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Dear Mark

**Monmouthshire County Council – Replacement Local Development Plan (LDP)  
Deposit Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government on the Monmouthshire County Council Replacement Local Development Plan (LDP) – Deposit consultation. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses.

Without prejudice to the Minister's powers, the Welsh Government is committed to helping Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework and that the tests of soundness (as set out in the 'LDP Manual') are addressed.

The development planning system in Wales is evidence led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination. It is essential that a plan is in general conformity with Future Wales, responds to national planning policy and the place making agenda, addresses climate change and nature emergencies, and demonstrates strategy delivery.

After considering the key issues and policies in Future Wales, the Draft Plan, as presented in relation to the scale of growth, is an appropriate fit with Future Wales: The National Development Framework. In the absence of a Strategic Development Plan evidence has been undertaken as to how the Monmouthshire Local Development Plan relates to sub regional development and impacts on neighbouring authorities. Specific comments are set out in the **Statement of General Conformity** (Annex 1 to this letter) with additional guidance contained in the Development Plans Manual (3<sup>rd</sup> Edition, March 2020) – 'the DPM'.

The Deposit Plan has been considered in accordance with the tests of soundness as set out in the DPM (Table 27, page 166). **Our representations are provided by topic area, with further detail in the attached Annex 2.**

National planning policies are set out in Planning Policy Wales (PPW) Edition 12, which seeks to deliver high quality, sustainable places through a place-making approach. The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist', to be followed.

It is encouraging to see that key background documents on issues including an up-to-date Local Housing Market Assessment, (LHMA), Strategic Site delivery and a high-level/site-specific viability appraisal have now been completed to 'front load' the process and inform findings in the Deposit Plan. A robust evidence base is critical to fully understand the plan.

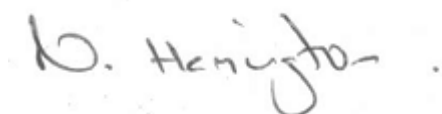
Our representation includes more detailed issues set out in Annex 1 and Annex 2 to this letter. Collectively, our comments attached highlight where previous concerns have or have not been addressed.

- Phosphates and nutrient neutrality
- Growth Levels
- Spatial distribution of housing
- Employment land provision
- The delivery of 50% affordable housing allocations
- Site delivery/implementation, including financial viability
- Gypsy and Traveller Accommodation

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely



**Neil Hemington**  
**Chief Planner Welsh Government**

For matters relating to general conformity with Future Wales and planning policy please contact: [PlanningPolicy@gov.wales](mailto:PlanningPolicy@gov.wales)

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## Statement of General Conformity

Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 33 and 36 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.

### Reasons

The Welsh Government acknowledges the work the local authority has undertaken in developing the Deposit Plan, which includes consideration of the local need for affordable housing and a number of growth and spatial options.

As the local authority acknowledge, Monmouthshire forms part of the South East Wales Region which includes a National Growth Area that focusses new development in Cardiff, Newport and the Valleys. Monmouthshire is not within the National Growth Area, as defined by Policy 1 and Policy 33 of Future Wales. **The level of economic and housing growth proposed by the Deposit Plan supports the local need for additional economic and affordable housing growth.**

Monmouthshire is predominantly a rural area with widely distributed market towns and villages. The south of the county has strong functional linkages to Newport, Cardiff and Bristol. The county is characterised by very significant environmental assets including the Wye Valley Area of Outstanding Natural Beauty (AONB), the setting of the Brecon Beacons National Park, the Gwent levels, Special Areas of Conservation (SACs), numerous Sites of Special Scientific Interest (SSSI) and many historic buildings and landscapes. The County also possesses some of the most significant tracts of Best and Most Versatile Agricultural land in Wales.

The level of housing proposed for the plan period (5,400 dwellings) is 2,790 units above the Welsh Government 2018-based principal household projection for Monmouthshire County Council minus the Brecon Beacons National Park Authority (BBNPA) area is 2,610 units. The proposed level of housing growth (360 dpa) is above the past 5 and 10-year build rates (310 and 285 dpa respectively). In terms of ensuring that the LDP delivers the identified requirement of 5,400 dwellings the Council has identified a flexibility allowance of 15%, a provision of 6,210 dwellings

**The level of growth proposed in the Deposit Plan is justified by the need to significantly increase the supply of affordable housing whilst not diverting growth away from the national growth area or have adverse effects on phosphate pollution.** The strategy of concentrating new growth in the Tier 1 settlements (85%) primarily in Caldicot and the Severnside area (35%) where phosphate mitigation is scheduled to be in place or is not an issue, should reduce the potential to negatively impact on environmental assets and avoid adverse consequences for climate and nature emergencies.

With regard to the level of housing identified whilst it is above the 2018 based projections and past build rates over the last 5 and 10 years, **a higher level of housing is only justified by the severe need to deliver affordable housing particularly for younger people.** The Council is seeking 50% of new allocations (above 20 units) to be affordable housing which will achieve the key objective of the plan. This will ensure that Monmouthshire continues grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.

Future Wales identifies a Green Belt to the north of Cardiff, Newport and the eastern part of the region and is clear that LDPs should not permit major development in areas shown for consideration as Green Belts, except in very exceptional circumstances. This is until the need for Green Belts and their boundaries has been established by an adopted Strategic Development Plan. Although the areas identified for growth in the Deposit Plan fall outside of the indicative Green Belt boundary and national planning policy allows for extensions to existing settlements within and adjoining the Green Belt of an appropriate scale, there should be no ambiguity about the need to protect land elsewhere.

Finally, whilst not an issue of general conformity but one relating to the tests of soundness, is that previously WG stated the need to demonstrate the Council has collaborated with neighbouring authorities to show alignment between growth levels, both homes and jobs. This point will be elaborated further in Annex 2.

Policy S9 (the policy should address reducing parking levels) is intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF).

**Annex 2** to Welsh Government Letter dated 13 December 2024 in response to Monmouthshire County Council's Replacement LDP – Deposit Plan**Phosphates**

Following NRW's publication of updated guidance relating to phosphates and nutrient neutrality in January 2021, the ability of LDPs to demonstrate they can align with the revised approach is paramount for plans to be able to be considered 'sound'. This primarily applies to the scale and location of new development, the ability of the existing infrastructure to remove phosphates to accommodate growth, the levels of phosphates within the riverine system and how nutrient neutrality can be achieved. Avoiding adverse effects regarding phosphates and the riverine environment may have an influence on the plan's strategy, to which this plan has responded positively. **The Deposit Plan and associated HRA must demonstrate nutrient neutrality or betterment in order to be considered sound.**

Spatial Option 2/Growth Option 2, on which the plan is predicated, excludes allocating further development in settlements north of Bigsweir Bridge. This would negate the issue of increasing the threat of phosphate contamination in the Upper Wye riverine system and is welcomed. However, this includes the settlement of Monmouth. The WG note improvements to the waste water treatment works (WWTWs) that serve Monmouth and Llanfoist (serving Abergavenny) have been confirmed, thereby enabling the allocation of development at these sustainable locations (Paragraph 3.1.5, RLDP). Monmouth is identified as a Primary settlement, as set out in the settlement analysis, which reflects the ability to allocate sites to reflect this analysis, whilst removing the phosphate barrier that was previously the case. **The WG has no objection on the distribution/scale of growth in relation to phosphates.**

**Growth Levels: Homes and Jobs**

The Council's Preferred Strategy is based on Growth Option 2, a demographic-led projection, resulting in a requirement of 5,400 dwellings (360 dpa) over the plan period 2018-2033. The strategy places great emphasis on the need for a step change in the supply of affordable housing with all new housing sites being affordable housing led (at least 50% affordable). **For reasons of consistency the Deposit plan should refer to the strategy as an affordable housing delivery led strategy.**

Strategic Policy S1: Preferred Growth Strategy, makes provision for 6,210 dwellings to deliver a requirement of 5,400 units with a 15% flexibility allowance. The WG notes that paragraph 3.3 (Housing Background Paper, 2024) provides rationale to support a higher value in line with requirements in the DPM. **The WG does not object to this level in principle.**

The Council has removed previous allocations which have either stalled or are not supported by sufficient evidence to demonstrate delivery. It is not appropriate to automatically consider they should be rolled forward. This is considered a prudent approach supported by advice in the DPM.

The proposed level of housing is above the WG 2018 principal projection, requiring an annual completion rate higher than both the previous 5 and 10 year averages. Monmouthshire is also outside the South East Wales National Growth Area, as set out in the Future Wales. However, the Council does have an acute need for affordable housing, approximately 3,085 affordable units over the plan period. Acknowledging a land bank of 4,085 units, combined with all proposed new allocations to be 50% affordable housing, with a refocus of the majority of new development in the Severnside area, **the Deposit Plan is considered to be in general conformity with Future Wales.**

### **Spatial Distribution of Housing**

Monmouthshire's preferred spatial strategy, Option 2: 'Sustainable and Resilient Communities Strategy' states the level of growth proposed in each settlement will be proportionate to its size, amenities, affordable housing need and capacity for growth. The settlement hierarchy listed in Strategic Policy S2 is underpinned by findings in the Council's Sustainable Settlements Appraisal (Updated December 2022). The appraisal confirms the dominant role of the Tier 1 County towns of Abergavenny, Chepstow, Monmouth Caldicot/Sevenside that account for 85% of all housing development. It should be noted this proportion has increased since the previous preferred strategy with the inclusion of Caldicot/Sevenside. Due to high phosphate levels in the Wye and Usk Welsh Water has made a commitment to improve the Waste Water Treatment facilities in Monmouth and Llanfoist (Paragraph 3.1.5, RLDP). Improvements to both works are currently subject to design and regulatory approval. DCWW has confirmed upgrades to the Llanfoist WwTW to include phosphate stripping capability in AMP 8 2025-2030 and upgrades to the Monmouth WwTW to include phosphate stripping capability in AMP 7 2020-2025. On the basis that improvement to both works to remove phosphates are planned it is appropriate to identify new affordable housing led allocations in both Monmouth and Abergavenny in the Deposit plan.

The appraisal identifies the other Tier 1 settlement of Caldicot within the Sevenside cluster, which has strong geographical and functional linkages to other Tier 2, 3 and 4 settlements along the M4 corridor. There is also a strong functional linkage with Newport, Cardiff and Bristol. Together the area accounts for 35% of the plan's housing growth.

It is noted there is a large urban extension to the east of Caldicot for approximately 1,200 units. Whilst this will not have an adverse effect on phosphates, potential implications for not increasing proportionately private car trips, minimising the impact on best and most versatile land, further consideration of developable area through detailed master planning and planning application in light of further detailed information on built heritage interests, as well as potential impacts on the Gwent levels will need to be demonstrated. **It would be beneficial for the examination that further technical work is undertaken to demonstrate that the broad scale of growth can be accommodated on the Caldicot and Monmouth sites where there could be issues relating to built heritage, potential Gwent Levels (National Natural Resource Area) impacts etc.**

The urban extension to the east of Abergavenny (600 units) signals the future direction of sustainable growth for the town during this plan period and beyond. The site is located close to the town centre and provides good public transport connectivity to Cardiff, Bristol and Hereford through the adjacent railway station. The schematic diagram demonstrates an appropriate mix of uses and provides an opportunity to promote transit orientated development in line with the policy objectives of Future Wales and Planning Policy Wales.

**Welsh Government does not object to the Deposit Plan settlement hierarchy and distribution of housing growth** with 85% of all new housing development proposed in the Tier 1 settlements which includes the Sevenside cluster. The number of new homes proposed in Tier 3 Main Rural Settlements and Tier 4 Minor Rural Villages are now specified separately, in accordance with the DPM.

### **Affordable Housing**

The Local Housing Market Assessment Refresh 2022-2037 (LHMA) identifies a need for 453 affordable units per annum over the first 5 years and 82 per annum for the remaining 10 years (or 3,085 units over the plan period). This is broken down in tenure terms for the first 5 years of the plan period as 82% is for social rent and 18% intermediate/low cost need. The greatest demand is for 1 bed properties across Monmouthshire. Strategic Policy S7 identifies the plans affordable housing target (range) of 1,595 – 2,000 units based on viability percentages in the adopted LDP for market led sites, with new allocations (1,650 – 2,125) on affordable housing led sites achieving rates of 50%.

To address housing affordability, the Council will deliver 50% affordable housing on the new affordable housing-led allocations (approx. 1,000 units). **The Welsh Government strongly supports affordable housing-led sites.** The Council has undertaken a Preliminary County-wide Viability Assessment (High-Level Financial Viability Appraisal, Burrows-Hutchinson Ltd, September 2024). The affordable housing targets set out in Strategic Policy S7 of the Deposit Replacement LDP are derived from, and are supported by, the financial viability assessments undertaken by or on behalf of the promoter(s) of each site allocated in the Deposit RLDP, all of which have been reviewed by BHL; and by the Countywide high-level assessments. **The Welsh Government supports this evidence based approach. It will be for the Council to justify the robustness of its conclusions. Building on the evidence from the county wide and site-specific viability appraisals, Statements of Common Ground (SoCG)** to demonstrate how public/private land can deliver this scale and mix of housing tenures and over what time period would be beneficial.

### **Employment Provision and Job Growth**

Strategic Policy S10 makes provision for 57Ha to deliver a minimum requirement of 38ha of employment land. This is supported by the Council's Employment Land Review (ELR, 2022) advising that employment forecasts are based on past take-up rates (1.85ha per annum) plus a 5-year buffer (9.5ha), equating to a requirement of 37.9ha (38Ha rounded) over the plan period (2018-2033).

The 6,240 job growth being sought by the Council (+416 jobs per annum) is based, amongst other things, on reducing the commuting ratio from the 2011 Census value (1.12) to the 2001 Census value (1.10) by 2033. The Councils strategy is not to reflect past trends but increase job opportunities. **The Welsh Government does not object to the level of employment land provision.**

### **Gypsy and Traveller Provision**

An updated Gypsy and Traveller Accommodation Assessment (GTAA) was agreed by the Welsh Ministers June 2024. The assessment identifies a need for 13 pitches over the plan period (2018-2033) with 9 residential pitches 2020-2025 and a further 4 pitches 2026-2033. Further to the GTAA planning permissions granted for 6 pitches, leaving a residual total of 7 pitches required over the plan period. Policy S7 identifies a site for 7 pitches, meeting the need identified in the plan period. **The Welsh Government supports this approach.** It will be for the Council to justify the site selection methodology

### **Minerals**

The second review of the Regional Technical Statement (RTS2) has been endorsed by Monmouthshire County Council and identifies that **no allocations are required in the plan period for crushed rock or sand and gravel.** This is reflected in Policy S16. It is a requirement of the RTS2 for all authorities, including Monmouthshire, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production in the Former Gwent sub-region, which also includes the authorities of Newport, Torfaen and Blaenau Gwent.

The Former Gwent Sub-Region Statement of Sub-Regional Collaboration – Position Statement has been prepared. In summary, the position statement concludes that it is not possible at this stage to establish what the sub-regional shortfall is and how it can be met until relevant planning applications/candidate site submissions in Blaenau Gwent and Torfaen are determined. The Council consider the situation will continue to be monitored and the Position Statement will be updated as necessary. **The Welsh Government supports this approach.**

### **BMV**

The Welsh Government has considered the approach taken through the plan preparation to date regarding how BMV land has been considered and, where there is a loss, justified. Specifically, the key stages of consideration and justification are evidenced at:

- **Growth Options Paper** – impact on BMV land is considered for all options.
- **Spatial Strategy and Appraisal** – BMV is considered for all options and the constraint that many settlements are surrounded by BMV. The Deposit plan considers and balances overriding need for allocations involving BMV.
- **Evidence Base** - the Predictive ALC Map for Wales has been used as an initial assessment of land quality. This has been supported by detailed ALC surveys where required. The LPA has engaged with the WG in validation ALC surveys over the LDP development.
- **Preferred Strategy Document, Appendix 4 (A2.5 to A2.10)** - this clearly demonstrates the policy requirement (PPW para 3.58 & 3.59), key issue of high proportion on BMV in the County and low availability of previously developed land / brownfield sites identified. This also sets out the pragmatic approach to address the policy (Predictive Map information as evidence base, detailed ALC survey requirement for BMV sites and consultation with WG).
- **Site Search Sequence** – BMV policy and sequential test approach followed.

**In conclusion, although significant areas of BMV will be developed, the Welsh Government considers the Authority has so demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.**

The plan has not allocated local search areas for ground mounted solar PV development. The WGt has engaged with the LPA on this matter, highlighting the BMV policy, DCPO letter (01/03/22) and the large proportion of high-quality agricultural land in Monmouthshire. **The proposal for considering renewable energy development on a case-by-case basis against national planning policy and the LDP policy is welcome.**

#### **Matters now addressed at Deposit Stage**

- The Council will need to ensure all development is compliant with TAN15 and flood risk issues. This should be done in compliance with the revised TAN15, anticipated to be published later in 2024.
- The Council has now set out a housing trajectory (Appendix 9) identifying the phasing and timing of sites, linked to any infrastructure required to deliver the housing requirement in line with Tables 16, 17, 19, 20, 21 and Diagram 16 in the DPM.
- The strategic growth options have been progressed further, with greater clarity, including schematic diagrams and the key issues which need to be addressed for each site to come forward.
- An Infrastructure Delivery Plan Background Paper (October 2024) has been prepared in response to WG previous concerns on this matter and included within the plan Appendix 8. This is in line with the DPM, paragraphs 5.125 – 5.128.
- All strategic development sites should be supported by Transport Assessments that are underpinned by the Welsh Transport Strategy and have regard to Active Travel and air quality, especially in existing Air Quality Management Areas (AQMAs).
- Further work on the contribution renewable energy can make to assist with climate change and decarbonisation has been undertaken with no policy objection.

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