

Monmouthshire Replacement Local Development Plan

Growth and Spatial Options Paper

September 2022



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**Monmouthshire County Council
Replacement Local Development Plan**

Growth and Spatial Options Paper

September 2022

Planning Policy Service

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1 Introduction

Background

1.1 The Council is preparing a Replacement Local Development Plan (RLDP) for Monmouthshire (excluding the part of the County that is within the Brecon Beacons National Park) for the period 2018 to 2033. The RLDP is a key Council policy document that allocates land for development, designates areas for protection and contains policies to provide the basis for deciding planning applications. The RLDP will identify where and how much new, sustainable development will take place to 2033, underpinned by a clear and robust evidence base.

1.2 Purpose of this paper

1.2.1 This is one of a series of background papers to support the Preferred Strategy. The growth and spatial options have been informed by a range of evidence and respond to a number of challenges that have arisen following stakeholder consultation and engagement on the previous Preferred Strategy in Summer 2021, namely the Welsh Government objection to the level of growth set out in that Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk.

1.2.2 This background paper expands upon the work completed to date on the growth and spatial options and provides a summary of each of the growth and spatial options, details of performance against the RLDP objectives, Integrated Sustainability Appraisal analysis and a conclusion detailing the preferred growth and spatial strategy. Appendix 1 provides a detailed appraisal of the combined growth and spatial strategy options considered in the September 2022 Council report.

2. Overview and Summary of Analysis of Growth Options

Table 1 - Growth Option 1: Previous 2021 Preferred Strategy (as consulted on July – August 2021):

Growth Option 1 Existing Preferred Strategy				
Assumptions				
Internal in-migration rates are adjusted to reflect higher in-migration (based on the last 5-years) from Bristol and South Gloucestershire, following the removal of the Severn Bridge tolls. All other migration flow assumptions are consistent with the PG Long Term scenario. Household membership rates for the young adult age-groups (19-24, 25-29, 30-34) have been adjusted to 'return' to their 2001 values between 2018-2033. Commuting ratio reduces from 2011 Census value (1.12) to 2001 Census value (1.10) over the Plan period. An average of 94dpa is added to the projected dwelling growth under this scenario between 2018-2033. This will meet a policy-led objective of achieving 10% of the projected need arising from this option, as evidenced by the LHMA, on sites with 50% affordable housing.				
Population Growth	Net Migration	Dwelling Requirement 2018 - 2033	Existing Landbank	New Allocations 2021-2033
12,443 (+13.2%)	18,345	Approximately 7,605-8,366 ¹ homes, including 2,170 - 2,450 affordable homes.	Approximately 4,710 homes. ²	Approximately 2,900 - 3,660 homes, including 1,210 - 1,490 affordable homes.
Jobs projected to 2033: Policy support to provide for 7,215 jobs ³				

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 5 against the RLDP Objectives
*Denotes those RLDP objectives that are considered to have increased emphasis and importance in light of Covid-19		
A Prosperous Wales (Well-being Goal 1)		
Objective 1	Economic Growth/ Employment*	Would result in a growth in jobs of 481 pa. This level of growth would encourage greater indigenous business growth and encourage inward investment. Provides the opportunity to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the current pandemic and would assist in building sustainable and resilient communities.

¹ Includes 10% flexibility allowance.

² The 2021 Preferred Strategy landbank figures included LDP Rollover applications, land supply commitments and allowances within the Wye Valley and the sites taken out due to non-delivery. It did not include completions for 2021/22.

³ Job figures are at a Unitary Authority level as small area data is not available. All other figures refer to the Local Planning Authority area, i.e. excluding Brecon Beacons National Park.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 5 against the RLDP Objectives
Objective 2	Retail centres*	Would provide increased opportunities to add to the customer base in retail centres in the County's towns, with a 13.2% increase in the population. There would be benefits arising from indigenous employment growth in the County, fostering the vitality, viability and attractiveness of the centres. The role and function of the high street in the local community has been highlighted of particular importance in the current pandemic. This option would provide sufficient support to existing retail facilities across the County.
A Resilient Wales (Well-being Goal 2)		
Objective 3	Green Infrastructure, Biodiversity and Landscape*	Likely to result in further pressure on the natural environment. New developments could nevertheless improve Green Infrastructure and ecological connectivity through opportunities to create new linkages. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened during the current pandemic.
Objective 4	Flood risk	Level of development likely to result in development in areas which have floodplains. Developments can nevertheless be located away from areas at risk of flooding and will incorporate SUDs in accordance with National Planning Policy and SUDs legislation.
Objective 5	Minerals and Waste	Levels of housing and employment development could impact on the safeguarding of the County's mineral resource. Developments can nevertheless be located away from safeguarded areas.
Objective 6	Land	Provision of housing alongside employment could promote efficient use of land and use of brownfield sites. However, it is recognised that there are limited opportunities for development on brownfield land and lower grade agricultural land.
Objective 7	Natural resources	There would be no negative impact on ability to promote the efficient use of natural resources. Any developments will be encouraged to be water and energy efficient and incorporate appropriate renewable energy technologies.
A Healthier Wales (Well-being Goal 3)		
Objective 8	Health and Well-being*	Any developments will be encouraged to support healthier lifestyles and provide sufficient open space. The value and importance of having access to locally accessible open/green spaces has been emphasised in light of Covid-19.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 5 against the RLDP Objectives
A More Equal Wales (Well-being Goal 4)		
Objective 9	Demography*	Results in an evening out of the age profile with growth coming from a broader cross section of the demographic. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option shows significant progress in achieving a more balanced demographic.
A Wales of Cohesive Communities (Well-being Goal 5)		
Objective 10	Housing*	Would provide a level of housing that is sufficient to provide a wide ranging choice of homes for both existing and future residents. The level of growth would provide opportunities to secure more significant affordable housing through the planning system. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.
Objective 11	Place-making	Any developments will need to enhance the character and identity of the settlements and be in accordance with national sustainable place-making principles. Growth in employment alongside housing will create more sustainable places. The value and importance of place-making has been emphasised in light of Covid-19.
Objective 12	Communities	A more balanced demographic with new development providing for a wide ranging choice of homes and jobs for both existing and future residents together with improvements to existing services and facilities. The current pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.
Objective 13	Rural Communities	A more balanced demographic with new development providing opportunities which could help support the rural economy and address rural isolation.
Objective 14	Infrastructure*	Appropriate infrastructure could be provided to accommodate any new development. The current pandemic has highlighted the importance of the provision of digital infrastructure and active travel options to support/enable increased home working and support local communities.
Objective 15	Accessibility	The level of employment growth alongside the housing development would be likely to reduce the need to travel. This would also be enhanced by the recent increase in

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 5 against the RLDP Objectives
		agile working and home and remote working as a result of Covid-19, which is likely to continue over the longer term. Any new developments will need to consider active travel and integrated sustainable transport.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)		
Objective 16	Culture, Heritage and Welsh Language	Has the potential to impact on the heritage of a number of settlements in Monmouthshire. On the other hand through design developments can protect and enhance the built environment as well as provide benefits for the economy, tourism and well-being of communities. No impact on Welsh Language.
A Globally Responsible Wales (Well-being Goal 7)		
Objective 17	Climate Change*	The resilience of new development to aspects of climate change can be achieved via the design and location of new developments. Developments can provide opportunities to minimise carbon by providing opportunities for renewable energy generation, seeking to reduce commuting, supporting use of ultra-low emission vehicles and public transport, and the provision of quality Green Infrastructure. The current pandemic has emphasised the need to enable such responses in delivering sustainable and resilient communities.
Integrated Sustainability Appraisal (ISA) Analysis		
<p>Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County.</p> <p>Regarding the transport ISA theme, while Option 1 proposes the highest level of growth compared to other options and consequently more likely to result in impacts on the local road network, there is no evidence to suggest these impacts are likely to be of significance. Increases in homeworking are considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Furthermore, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift. Option 1 is ranked most favourably overall.</p> <p>Option 1 performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape, however, the nature and significance of effects will be dependent on where growth is located and how development is designed/implemented. It is also recognised that higher levels of development proposed will have further potential to deliver environmental enhancements/ improvements that could lead to positive effects. However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative</p>		

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 5 against the RLDP Objectives
		effects likely. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.

** Option title as referred to in the Edge Analytics Reports.

Table 2 - Growth Option 2: Demographic-led Strategy

Growth Option 2 Demographic -led Strategy				
Assumptions				
Demographic-led strategy option for the LPA area (i.e. excludes the BBNP area within Monmouthshire and excludes AH-led strategy) using ONS 2020 MYE base and applying the same assumptions as the existing Preferred Strategy in relation to migration, household membership rates and commuting ratio. This gives a dwelling requirement of 5,400 dwellings over the Plan period.				
Population Growth	Net Migration	Dwelling Requirement 2018 - 2033	Existing Landbank	New Allocations 2021-2033
9,480 (+10.9%)	13,950	Approximately 5,400 – 5,940 ⁴ homes, including 1,580 - 1,850 affordable homes.	Approximately 3,740 homes. ⁵	Approximately 1,660 – 2,200 homes, including 830 – 1,100 new affordable homes. ⁶
Jobs projected to 2033: Policy support to provide 6,240 jobs ⁷				

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
*Denotes those RLDP objectives that are considered to have increased emphasis and importance in light of Covid-19		
A Prosperous Wales (Well-being Goal 1)		
Objective 1	Economic Growth/ Employment*	Would result in a growth in jobs of 416 pa. This level of growth would encourage greater indigenous business growth and encourage inward investment. Provides the opportunity to create a thriving, well-connected, diverse economy and would assist in building sustainable and resilient communities.

⁴ Includes 10% flexibility allowance.

⁵ The new 2022 option's landbank excludes existing land supply commitments and allowances within the upper River Wye catchment. Land bank also excludes LDP Rollover sites and sites taken out due to non-delivery. It includes completions for 2021/22

⁶ Based on all RLDP site allocations being 50% affordable housing

⁷ Job figures are at a Unitary Authority level as small area data is not available. All other figures refer to the Local Planning Authority area, i.e. excluding Brecon Beacons National Park.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
Objective 2	Retail centres*	Would provide increased opportunities to add to the customer base in retail centres in the County's towns, with a 10.9% increase in the population. There would be benefits arising from indigenous employment growth in the County, fostering the vitality, viability and attractiveness of the centres. This option would provide sufficient support to existing retail facilities across the County.
A Resilient Wales (Well-being Goal 2)		
Objective 3	Green Infrastructure, Biodiversity and Landscape*	Likely to result in further pressure on the natural environment. New developments could nevertheless improve Green Infrastructure and ecological connectivity through opportunities to create new linkages. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened over recent years due to Covid-19.
Objective 4	Flood risk	Level of development likely to result in development in areas which have floodplains. Developments can nevertheless be located away from areas at risk of flooding and will incorporate SUDs in accordance with National Planning Policy and SUDs legislation.
Objective 5	Minerals and Waste	Levels of housing and employment development could impact on the safeguarding of the County's mineral resource. Developments can nevertheless be located away from safeguarded areas. Mineral obligations could be met.
Objective 6	Land	Provision of housing alongside employment could promote efficient use of land and use of brownfield sites. However, it is recognised that there are limited opportunities for development on brownfield land and lower grade agricultural land.
Objective 7	Natural resources	There would be no negative impact on ability to promote the efficient use of natural resources. Any developments will be encouraged to be water and energy efficient and incorporate appropriate renewable energy technologies in order to be carbon net zero ready and help address climate change.
A Healthier Wales (Well-being Goal 3)		
Objective 8	Health and Well-being*	Any developments will be encouraged to support healthier lifestyles and provide sufficient open space. The value and importance of having access to locally accessible open/green spaces has been emphasised in light of Covid-19.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
A More Equal Wales (Well-being Goal 4)		
Objective 9	Demography*	Begins to address the unbalanced demographic through growth from a larger number of age groups, recognising the level of growth from the younger age groups is at a low level with some decline in the 20-29 age group. This compares to a more significant increase in the 30-44 age group. There would therefore be positive impact with a more balanced demography with an increase in the number of older and elderly people living in the County balanced against an increase in the younger age groups and greater provision of dwellings and jobs increasing the opportunities for the younger population to both live and work in Monmouthshire. The Covid-19 pandemic demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography.
A Wales of Cohesive Communities (Well-being Goal 5)		
Objective 10	Housing*	The level of growth would provide opportunities to secure a more significant amount of affordable housing through the planning system to help tackle Monmouthshire's housing need, homelessness and social inequality. It would deliver a level of housing that is sufficient to provide a wide-ranging choice of homes for both existing and future residents. All new dwelling allocations would be required to deliver 50% affordable housing, maximising the delivery of essential affordable homes and socially sustainable communities. There is a need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.
Objective 11	Place-making	Any developments will need to enhance the character and identity of the settlements and be in accordance with national sustainable place-making principles. Growth in employment alongside housing will create more sustainable places.
Objective 12	Communities	Would provide a more balanced demographic however it should be recognised there is some decline in the 20-29 age group. New development will provide for a wide-ranging choice of homes and jobs for both existing and future residents together with improvements to existing services and facilities. The Covid-19 pandemic has demonstrated the importance of ensuring our

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
		communities are balanced and socially sustainable, particularly in terms of demography.
Objective 13	Rural Communities	Would provide a more balanced demographic however it should be recognised there is some decline in the 20-29 age group. New development could provide opportunities to support the rural economy and address rural isolation and social inequality.
Objective 14	Infrastructure*	Appropriate infrastructure could be provided to accommodate any new development. The Covid-19 pandemic highlighted the importance of the provision of digital infrastructure and active travel options to support/enable increased home working and support local communities.
Objective 15	Accessibility	The level of employment growth alongside the housing development would be likely to reduce the need to travel. This would also be enhanced by the increase in agile working and home and remote working as a result of Covid-19, which is likely to continue over the longer term. Any new developments will need to consider active travel and integrated sustainable transport.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)		
Objective 16	Culture, Heritage and Welsh Language	Has the potential to impact on the heritage of a number of settlements in Monmouthshire. On the other hand through design developments can protect and enhance the built environment as well as provide benefits for the economy, tourism and well-being of communities. No impact on Welsh Language.
A Globally Responsible Wales (Well-being Goal 7)		
Objective 17	Climate Change*	The resilience of new development to aspects of climate change can be achieved via the design and location of new developments. Developments can provide opportunities to address climate change and minimise carbon through, renewable energy generation, seeking to reduce commuting, supporting use of ultra-low emission vehicles and public transport, and the provision of quality Green Infrastructure. The aspiration to design and build homes to be carbon net zero ready will help tackle climate change and inequality, particularly in relation to affordable housing.
Integrated Sustainability Appraisal (ISA) Analysis		
Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this option. This growth option performs well against ISA themes relating to the economy and employment, population		

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
		<p>and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County. This option will provide a more balanced demographic and more sustainable communities than predicted under Growth Option 3.</p> <p>Regarding the transport ISA theme, while Option 2 proposes a higher level of growth compared to Option 3 and is more likely to result in impacts on the local road network there is no evidence to suggest these impacts are likely to be of significance. Increases in homeworking are considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Furthermore, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift. Option 2 is ranked in the middle, more favourably overall than Option 3.</p> <p>Option 2 is ranked in the middle against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape, however, the nature and significance of effects will be dependent on where growth is located and how development is designed/implemented. There is no evidence to conclude that this option will have would result in a significant negative effect on these themes. It is also recognised that higher levels of development proposed will have further potential to deliver environmental enhancements/ improvements that could lead to positive effects. However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.</p>

Table 3 – Growth Option 3: WG Prescribed 10-year Past Build Rate

Growth Option 3 WG Prescribed 10-year Past Build Rate

Assumptions

Welsh Government Prescribed 10-year Past Build Rate (based on 10 years to 2020) (excluding BBNP Growth and excluding AH-led strategy). This gives a dwelling requirement of 4,280 dwellings over the Plan period.

Population Growth	Net Migration	Dwelling Requirement 2018 - 2033	Existing Landbank	New Allocations 2021-2033
8,050 (+9.3%)	12,450	Approximately 4,280 – 4,700, including 940 – 1,150 affordable homes.	Approximately 3,940 homes. ⁸	Approximately 330 – 760 homes, including 170-380 affordable homes. ⁹

Jobs projected to 2033: Policy support to provide 4,290¹⁰

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 3 against the RLDP Objectives
*Denotes those RLDP objectives that are considered to have increased emphasis and importance in light of Covid-19		
A Prosperous Wales (Well-being Goal 1)		
Objective 1	Economic Growth/ Employment*	An overall decline in the working age population in the County, although there is some growth in the 30-44 age groups. Employment growth brings job levels in the County broadly in line with the average job level seen over the last 15 years, but not until the end of the Plan period. This indicates that whilst the commuting levels will reduce people will still need to leave the County to access employment. Does not provide for ambition and would not support sustainable economic growth /prosperity. Provides limited opportunities to create a thriving, well-connected, diverse economy, which has been highlighted as being of particular importance in light of the Covid-19 pandemic.
Objective 2	Retail centres*	Would provide opportunity to add to the customer base in existing centres but would be unlikely to address the pressures the retail centres in the County's towns are currently facing which would impact negatively on the vitality, viability and attractiveness of the centres. The role and function of the high street in the local community has been highlighted of particular importance in recent

⁸ The new 2022 option's landbank excludes existing land supply commitments and allowances within the upper River Wye catchment. Land bank also excludes LDP Rollover sites and sites taken out due to non-delivery. It includes completions for 2021/22

⁹ Based on all RLDP site allocations being 50% affordable housing

¹⁰ Job figures are at a Unitary Authority level as small area data is not available. All other figures refer to the Local Planning Authority area, i.e. excluding Brecon Beacons National Park.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 3 against the RLDP Objectives
		years. This option would not provide sufficient support to existing retail facilities across the County.
A Resilient Wales (Well-being Goal 2)		
Objective 3	Green Infrastructure, Biodiversity and Landscape*	There would be no significant impacts on the natural environment, although at the same time it would provide fewer opportunities to create new linkages through improvements to Green Infrastructure and ecological connectivity. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened over recent years due to Covid-19.
Objective 4	Flood risk	There would be no negative impact as the low level of growth can be located away from areas of flood risk and will incorporate SUDs in accordance with National Planning Policy and SUDs legislation.
Objective 5	Minerals and Waste	There would be no negative impact on minerals and waste, mineral landbank obligations can be met.
Objective 6	Land	Provision of housing alongside employment could promote efficient use of land and use of brownfield sites. However, it is recognised that there are limited opportunities for development on brownfield land and lower grade agricultural land.
Objective 7	Natural resources	There would be no negative impact on the ability to promote the efficient use of natural resources. Any developments will be encouraged to be water and energy efficient and incorporate appropriate renewable energy technologies in order to be carbon net zero ready and help address climate change.
A Healthier Wales (Well-being Goal 3)		
Objective 8	Health and Well-being*	The continuation of an ageing population and proposed level of growth would have a negative impact on health and well-being with a limited scope to support additional provision and/or upgrades to existing provision. Any developments will be encouraged to support healthier lifestyles and provide sufficient open space. The value and importance of having access to locally accessible open/green spaces has been emphasised in light of Covid-19.
A More Equal Wales (Well-being Goal 4)		

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 3 against the RLDP Objectives
Objective 9	Demography*	Would result in an increase in the proportion of the older and elderly people living in the County leading to a more unbalanced demographic. Very limited opportunities for the younger population to live and work in the County. The Covid-19 pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would not address the demographic imbalance in the County.
A Wales of Cohesive Communities (Well-being Goal 5)		
Objective 10	Housing*	This build rate would not be able to offer the range or number of homes to address the demographic imbalance or the range of homes needed to attract the economically active age group and the type of homes the ageing demographic would require. Limited opportunity to secure additional market or affordable housing. There is a need to ensure the provision of a range and choice of homes (housing mix) in future housing developments. Would not deliver the Administration's manifesto commitment to maximise affordable housing delivery via 50% affordable housing provision on new housing sites as there would be very few new site allocations. This minimal level of provision would make minimal contribution towards addressing our affordable housing need in the County, as evidenced in the LHMA. This option would not therefore address the County's affordability issues or build sustainable and resilient communities throughout Monmouthshire. This option would exacerbate social inequality.
Objective 11	Place-making	Low requirement for new housing so provides very limited opportunity to enhance the character and identity of Monmouthshire's settlements.
Objective 12	Communities	Would impact on communities and exacerbate inequality, by providing limited opportunities for job creation or improvements to existing services and facilities. The unbalanced demographic and low level of dwelling and job creation provides little opportunity to support social sustainability and balanced communities. This growth option would fail to address this key issue and would be

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 3 against the RLDP Objectives
		detrimental to our core purpose of creating sustainable and resilient communities.
Objective 13	Rural Communities	Would impact negatively on rural communities by providing few opportunities to strengthen the rural economy or opportunities for people to stay in their local communities. Difficulties in sustaining services/facilities across the County will result in rural isolation and exacerbate inequality.
Objective 14	Infrastructure*	Would have a negative impact as a declining and unbalanced demographic would result in falling school numbers and could result in school closures, as well as increased pressure on health and social care. Difficulties in sustaining services/facilities across the County as well as limited opportunities to improve a range of infrastructure, including active travel and digital infrastructure would increase issues associated with rural isolation including social inequality.
Objective 15	Accessibility	Would have a negative impact as limited employment growth would limit job opportunities in the County leading to a continuation of out-commuting levels. Although it should be recognised that in light of Covid-19 there has been an increase in agile and home working, which is likely to continue over the longer term. The increased reliance on access to local facilities and services over recent years has highlighted their importance to communities. Lack of employment opportunities and low housing growth level would result in limited opportunities to enhance accessibility, active travel and the use of sustainable transport options.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)		
Objective 16	Culture, Heritage and Welsh Language	There would be no negative impact on culture and heritage, but at the same time offers few benefits for the economy, tourism and social well-being of communities. No impact on Welsh Language.
A Globally Responsible Wales (Well-being Goal 7)		
Objective 17	Climate Change*	There would be no negative impact on climate change, with a reduction in commuting in the long term as the population ages being a positive. At the same time there would be limited opportunities to contribute to tackling climate change and minimising carbon through renewable energy generation, supporting use of ultra-low emission

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 3 against the RLDP Objectives
		vehicles and public transport, as well as securing quality Green Infrastructure. The aspiration to design and build homes to be carbon net zero ready will have limited impact.
Integrated Sustainability Appraisal (ISA) Analysis		
<p>Option 3 is noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. However, there is a level of uncertainty, with effects unlikely to be significant in most cases. Particular concern relates predominantly to limited growth restricting opportunities to address a likely resultant demographic imbalance, which in turn would not support sustainable economic growth. Under this option, limited opportunities for the younger population to live and work in the County would negatively impact communities, exacerbating inequality and rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly, and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, under Option 3 there would be a limited opportunity to secure additional market or affordable housing, limiting the range and choice of homes (housing mix) which could drive up house prices and exacerbate affordability issues.</p> <p>Regarding the transport ISA theme, while Option 3 is considered to likely result in less impacts on the local road network, lower growth presents less potential to deliver accessibility and infrastructure improvements. Option 3 is therefore ranked least favourably overall.</p> <p>Option 3 is ranked most favourably in respect of potential environmental impacts including ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape, however, the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented.</p> <p>Given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.</p>		

3. Overview and Summary of Analysis of Spatial Options

Table 4 - Spatial Option 1

Spatial Option 1: Previous 2021 Preferred Spatial Strategy (as consulted on July – August 2021):		
Distribute growth proportionately across the County’s most sustainable settlements. Growth, including jobs and affordable housing, would be distributed across the County’s most sustainable settlements (as identified within the Sustainable Settlement Appraisal) with the level of growth proportionate to that settlement’s size and amenities, affordable housing need as identified in the LHMA, the capacity for growth and/or the need for development to sustain the community.		
RLDP Objective Number	RLDP Objective - Headline	Performance of Option 1 against the RLDP Objectives
*Denotes those RLDP objectives that are considered to have increased emphasis and importance in light of Covid-19 as referred to in paragraph 3.8		
A Prosperous Wales (Well-being Goal 1)		
Objective 1	Economic Growth/ Employment*	Distributing growth proportionately across the County’s most sustainable settlements would encourage greater indigenous business growth across the County as a whole while at the same time encouraging inward investment. Provides opportunity to create a thriving, well-connected, diverse economy, which is of particular importance in light of the current pandemic.
Objective 2	Retail centres*	Would provide the opportunity to add to the customer base in existing retail centres through growth in the most sustainable settlements. May also attract additional facilities in sustainable settlements. The role and function of the high street in the local community has been highlighted of particular importance in the current pandemic.
A Resilient Wales (Well-being Goal 2)		
Objective 3	Green Infrastructure, Biodiversity and Landscape*	Likely to result in further pressure on the natural environment. New developments in these locations could nevertheless improve Green Infrastructure and Ecological connectivity through opportunities to create new linkages. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened during the current pandemic.
Objective 4	Flood risk	Distributing growth proportionately to the most sustainable settlements could result in development in areas such as Abergavenny, Chepstow, Monmouth, Raglan and Usk, which all have areas of floodplain. Developments can nevertheless be located away from

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 1 against the RLDP Objectives
		areas at risk of flooding and will incorporate SUDs in accordance with National Planning Policy and SUDs legislation.
Objective 5	Minerals and Waste	There would be no negative impact on minerals and waste, mineral landbank obligations can be met.
Objective 6	Land	Limited opportunities for brownfield development or development on lower grade agricultural land, however, some opportunities exist within the Primary Settlements. Likely to be predominately greenfield development.
Objective 7	Natural resources	There would be no negative impact on ability to promote the efficient use of natural resources. Any developments will be encouraged to be water and energy efficient.
A Healthier Wales (Well-being Goal 3)		
Objective 8	Health and Well-being*	There would be no negative impact on health and well-being. Any developments will be encouraged to support healthier lifestyles and provide sufficient open space, the value and importance of having access to locally accessible open/green spaces has been emphasised in light of Covid-19.
A More Equal Wales (Well-being Goal 4)		
Objective 9	Demography*	Housing would be distributed proportionately across all housing market areas to meet housing needs in the most sustainable settlements identified as having capacity for growth/or in need of development to sustain them. Affordable housing will be directed to those sustainable areas identified in the LHMA as having the greatest housing need, which would assist in ensuring a more balanced demography. Would provide increased opportunities through employment and housing provision for the younger population to live and work in Monmouthshire. The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would support/enable social sustainability and balanced communities across the County.
A Wales of Cohesive Communities (Well-being Goal 5)		
Objective 10	Housing*	Would provide opportunity for sufficient homes, although recognise this is dependent on the level of growth. Housing would be distributed proportionately across the

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 1 against the RLDP Objectives
		County's most sustainable settlements to meet housing needs, including the provision of affordable housing in those sustainable areas identified in the LHMA as having the greatest housing need. The current pandemic has emphasised the need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire.
Objective 11	Place-making	Any developments will need to enhance the character and identity of the Primary, Secondary, Severnside and Rural Settlements in accordance with national sustainable place-making principles, the value and importance of place-making has been emphasised in light of Covid-19.
Objective 12	Communities	Developments would be located in the most sustainable settlements in Monmouthshire in both urban and rural areas that have the best access to employment, retail, community facilities and social infrastructure (Primary Settlements, Secondary Settlements, Severnside and Rural Settlements). The current pandemic has clearly demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would support/enable social sustainability and balanced communities across the County.
Objective 13	Rural Communities	Housing would be distributed in both urban and rural areas, with a focus on the most sustainable settlements. Would help to support sustainable rural areas where facilities are struggling/declining by providing development to help sustain them.
Objective 14	Infrastructure*	Would utilise existing infrastructure, particularly in the Primary and Severnside Settlements, by distributing development across the most sustainable settlements. Development will generate opportunities to both provide new infrastructure and enhance the existing. Would also provide additional support for facilities in sustainable areas where growth has previously been limited. The current pandemic has highlighted the importance of the provision of digital infrastructure and active travel options to support/enable increased home/remote working and support local communities.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 1 against the RLDP Objectives
Objective 15	Accessibility	New residential development would be distributed proportionately across the County's most sustainable settlements, providing more choice of areas for people to live and work. However, there is no guarantee that residents would live and work in the same area. Although it should be recognised that in light of Covid-19 there has been an increase in agile and home working, which is likely to continue over the longer term ¹¹ . The increased reliance on access to local facilities and services during the current pandemic, has highlighted their importance to communities. While many of the settlements already have sustainable travel links in place through existing rail and bus links, any new developments will need to fully consider active travel and integrated sustainable transport opportunities.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)		
Objective 16	Culture, Heritage and Welsh Language	Dependent on location of sites, has the potential to impact on the heritage of a number of settlements in Monmouthshire. However, through design developments can protect and enhance the built environment as well as providing benefits for the economy, tourism and well-being of communities. No impact on Welsh Language.
A Globally Responsible Wales (Well-being Goal 7)		
Objective 17	Climate Change*	Resilience of new development to aspects of Climate Change can be achieved via the design and location of new developments. Developments can provide opportunities to minimise carbon by providing opportunities for renewable energy generation, seeking to reduce commuting, supporting use of ultra-low emission vehicles and public transport, and the provision of quality Green Infrastructure. The current pandemic has emphasised the need to enable such responses in delivering sustainable and resilient communities.
Integrated Sustainability Appraisal (ISA) Analysis		
The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment ISA theme, given that both options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints. However, it is recognised that mitigation could be provided, and that development		

¹¹ Welsh Government announced in September 2020 that they have a long-term ambition for around 30% of the Welsh workforce to work remotely either from home or near to home using community-based remote working hubs <https://gov.wales/aim-30-welsh-workforce-work-remotely>

also has the potential to deliver positive effects through improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.

Similarly, in relation to the biodiversity theme, it is considered that both options have the potential to adversely impact upon the County’s biodiversity resource by directing development to areas that are sensitive in terms of internationally/ nationally designated biodiversity sites. However, effects have the potential to be greater under Option 1 given there would be new dwelling growth at the Primary Settlement of Monmouth, which has the potential to significant impact upon water quality in the River Wye SAC as a result of phosphorus loading.

In terms of the landscape and climate change themes, Option 1 directs growth to Monmouth, which has been identified as one of the most vulnerable settlements to flooding (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing). Option 1 also directs the highest level of growth in close proximity to the AONB and National Park, and therefore has a higher likelihood of negative effect arising than Option 2. However, given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, both options are found to have an uncertain effects in relation to the landscape and climate change themes.

While both options perform well, Option 1 performs more positively than Option 2 against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. Option 1 is found to have the potential for significant long-term positive effects, focusing growth at all of the County’s most sustainable Settlements where there is greater need and better access to public transport, existing employment and facilities/ services.

Table 5 - Spatial Option 2:

Spatial Option 2: Focus growth in the County’s most sustainable settlements of Abergavenny, Chepstow and Caldicot including Severnside, as well as some growth in our most sustainable rural settlements, excluding those settlements in the Upper Wye catchment area

Focus growth in the County’s most sustainable settlements of Abergavenny, Chepstow and Caldicot including Severnside, as well as some growth in our most sustainable rural settlements, excluding those settlements in the Upper Wye catchment area. No new site allocations can be considered in settlements within the upper River Wye catchment area north of Bigsweir Bridge, including the primary settlement of Monmouth, due to the lack of an identified strategic solution for the treatment of phosphates at the Monmouth WwTW within the Plan period.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
*Denotes those RLDP objectives that are considered to have increased emphasis and importance in light of Covid-19		
A Prosperous Wales (Well-being Goal 1)		

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
Objective 1	Economic Growth/ Employment*	Distributing growth proportionately across the County's most sustainable settlements excluding those settlements in the Upper Wye catchment area would encourage greater indigenous business growth across the County while at the same time encouraging inward investment. Provides opportunity to create a thriving, well-connected, diverse economy. There are concerns however over the impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area.
Objective 2	Retail centres*	Would provide the opportunity to add to the customer base in existing retail centres through growth in the most sustainable settlements. May also attract additional facilities in sustainable settlements. The role and function of the high street in the local community has been highlighted of particular importance in recent years. There are concerns however over the impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area.
A Resilient Wales (Well-being Goal 2)		
Objective 3	Green Infrastructure, Biodiversity and Landscape*	Likely to result in further pressure on the natural environment. New developments in these locations could nevertheless improve Green Infrastructure and Ecological connectivity through opportunities to create new linkages. Less potential impact on the River Wye SAC as no new allocations are proposed in the upper River Wye Catchment Area. The value and importance of having access to locally accessible open/green spaces to assist in recreation and health and well-being has been heightened over recent years due to Covid-19.
Objective 4	Flood risk	Distributing growth proportionately to the most sustainable settlements (excluding those settlements in the Upper Wye catchment area) could result in development in areas such as Abergavenny, Chepstow, Raglan and Usk, which all have areas of floodplain. Developments can nevertheless be located away from areas at risk of flooding and will incorporate SUDs in accordance with National Planning Policy and SUDs legislation.
Objective 5	Minerals and Waste	There would be no negative impact on minerals and waste, mineral landbank obligations can be met.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
Objective 6	Land	Limited opportunities for brownfield development or development on lower grade agricultural land, however, some opportunities exist within the Primary Settlements. Likely to be predominately greenfield development.
Objective 7	Natural resources	There would be no negative impact on ability to promote the efficient use of natural resources. Any developments will be encouraged to be water and energy efficient and incorporate appropriate renewable energy technologies in order to be carbon net zero ready and help address climate change.
A Healthier Wales (Well-being Goal 3)		
Objective 8	Health and Well-being*	There would be no negative impact on health and well-being. Any developments will be encouraged to support healthier lifestyles and provide sufficient open space, the value and importance of having access to locally accessible open/green spaces has been emphasised in light of Covid-19.
A More Equal Wales (Well-being Goal 4)		
Objective 9	Demography*	Housing would be distributed proportionately across the County's most sustainable settlements of Abergavenny, Chepstow and Severnside, as well as some growth in rural settlements. Would meet housing needs in the most sustainable settlements identified as having capacity for growth/or in need of development to sustain them. However, there are concerns as would not meet housing needs in the Monmouth Housing Market Area. Affordable housing will be directed to those sustainable areas identified in the LHMA as having the greatest housing need, which would assist in ensuring a more balanced demography. Would provide increased opportunities through employment and housing provision for the younger population to live and work in Monmouthshire. This option would support/enable social sustainability and balanced communities across the County. There is nevertheless concern over impact of no new housing allocations on those settlements in the Upper Wye catchment area.
A Wales of Cohesive Communities (Well-being Goal 5)		
Objective 10	Housing*	Would provide opportunity for sufficient homes to help tackle Monmouthshire's housing need, homelessness and social inequality, although recognise this is dependent on

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
		the level of growth. Housing would be distributed proportionately across the County's most sustainable settlements, excluding those settlements in the Upper Wye catchment area. This would meet housing needs, including the provision of affordable housing in those sustainable areas identified in the LHMA as having the greatest housing need. There is a need to ensure the provision of a range and choice of homes (housing mix) in future housing developments to address the County's affordability issues and to build sustainable and resilient communities throughout Monmouthshire. There are concerns however over impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area.
Objective 11	Place-making	Any developments will need to enhance the character and identity of the Primary, Secondary, Severnside and Rural Settlements in accordance with national sustainable place-making principles.
Objective 12	Communities	Developments would be located in the most sustainable settlements in Monmouthshire in both urban and rural areas that have the best access to employment, retail, community facilities and social infrastructure (Primary Settlements, Secondary Settlements, Severnside and Rural Settlements). The Covid-19 pandemic has demonstrated the importance of ensuring our communities are balanced and socially sustainable, particularly in terms of demography. This option would support/enable social sustainability and balanced communities addressing social inequality across the County. There are concerns however over impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area.
Objective 13	Rural Communities	Housing would be distributed in both urban and rural areas, with a focus on the most sustainable settlements. Would help to support sustainable rural areas where facilities are struggling/declining by providing development to help sustain them. There are concerns however over impact of no new site allocations in the areas within the Upper Wye catchment area.

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
Objective 14	Infrastructure*	Would utilise existing infrastructure, particularly in the Primary and Severnside Settlements, by distributing development across the most sustainable settlements. Development will generate opportunities to both provide new infrastructure and enhance the existing. Would also provide additional support for facilities in sustainable areas where growth has previously been limited. The Covid-19 pandemic has highlighted the importance of the provision of digital infrastructure and active travel options to support/enable increased home/ remote working and support local communities. There are concerns however over impact of no new site allocations in the Primary Settlement of Monmouth and other areas within the Upper Wye catchment area.
Objective 15	Accessibility	New residential development would be distributed proportionately across the County's most sustainable settlements (excluding those within the Upper Wye catchment area), providing more choice of areas for people to live and work. However, there is no guarantee that residents would live and work in the same area. Although it should be recognised that in light of Covid-19 there has been an increase in agile and home working, which is likely to continue over the longer term ¹² . The increased reliance on access to local facilities and services during the Covid-19 pandemic, has highlighted their importance to communities. While many of the settlements already have sustainable travel links in place through existing rail and bus links, any new developments will need to fully consider active travel and integrated sustainable transport opportunities.
A Wales of Vibrant Culture & Thriving Welsh Language (Well-being Goal 6)		
Objective 16	Culture, Heritage and Welsh Language	Dependent on location of sites, has the potential to impact on the heritage of a number of settlements in Monmouthshire. However, through design developments can protect and enhance the built environment as well as providing benefits for the economy, tourism and well-being of communities. No impact on Welsh Language.
A Globally Responsible Wales (Well-being Goal 7)		

¹² Welsh Government announced in September 2020 that they have a long-term ambition for around 30% of the Welsh workforce to work remotely either from home or near to home using community-based remote working hubs <https://gov.wales/aim-30-welsh-workforce-work-remotely>

RLDP Objective Number	RLDP Objective - Headline	Performance of Option 2 against the RLDP Objectives
Objective 17	Climate Change*	Resilience of new development to aspects of Climate Change can be achieved via the design and location of new developments. Developments can provide opportunities to address climate change and minimise carbon by providing opportunities for renewable energy generation, seeking to reduce commuting, supporting use of ultra-low emission vehicles and public transport, and the provision of quality Green Infrastructure. The Covid-19 pandemic has emphasised the need to enable such responses in delivering sustainable and resilient communities. The aspiration to design and build homes to be carbon net zero ready will help tackle climate change and inequality, particularly in relation to affordable housing.

Integrated Sustainability Appraisal (ISA) Analysis

The appraisal found that there is little to differentiate between the options at this stage with regard to the historic environment ISA theme, given that both options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects through improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.

Similarly, in relation to the biodiversity theme, it is considered that both options have the potential to adversely impact upon the County's biodiversity resource by directing development to areas that are sensitive in terms of internationally/ nationally designated biodiversity sites. However, Option 2 excludes growth from the Upper Wye Catchment area, protecting the integrity of the SAC and therefore has a lesser impact.

In terms of the landscape and climate change themes, Option 2 directs development to areas of lower flood risk and that are less sensitive in landscape designations and is therefore considered to perform better compared to Option 1 (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing). However, given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, both options are found to have an uncertain effects in relation to the landscape and climate change themes.

In terms of natural resources, Option 2 performs most positively than Option 1 as no new allocations will be located within the Upper Wye River Catchment. However, it is not possible to meaningfully differentiate between the options at this stage.

While both options perform well, Option 2 performs less positively than Option 1 against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and

equalities. The significance of effects is uncertain, reflecting the absence of growth at key settlement Monmouth, and other settlements in the upper River Wye catchment area. This has the potential to exacerbate existing demographic issues and levels of out-commuting, specifically in the upper River Wye catchment area.

4 Conclusion

4.1 Preferred Strategy Option

- 4.1.1 The options appraisal concludes that Growth Option 2 and Spatial Option 2 combined are the most appropriate strategy option for the new Preferred Strategy. The other growth and spatial strategy options have been discounted for various reasons, as set out in the options appraisal in Appendix 1.
- 4.1.2 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions¹³. While this option would reduce the level of growth proposed compared to the 2021 Preferred Strategy, it is considered the best option to respond to the challenge outlined in paragraph 1.2.1, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues and objectives in the south of the County and River Usk catchment area, including delivering much needed affordable housing, responding to the climate and nature emergency by delivering zero carbon ready new homes for our communities, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic.
- 4.1.3 The ISA analysis found that Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however, similar positive effects are predicted under this option. This growth option performs well against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County providing a more balanced demographic and sustainable communities. While Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities it performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape. In addition, Welsh Government raised significant concerns in relation to this Growth Option, and, without an identified strategic solution to the water quality environmental constraint in the upper River Wye Catchment the Council cannot progress with new site allocations for future growth in this area within the Plan period. Growth Option 1 has subsequently been discounted. Growth Option 3 performs negatively with regard to the RLDP objectives relating to Economic Growth/Employment, Demography, Housing, Place-making, Communities, Rural Communities, Infrastructure and Accessibility. It is also noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and

¹³ Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.

social inclusion. Option 3 would not deliver on our core objectives of delivery of affordable housing and rebalancing our demography and has also subsequently been discounted. For further details on the growth options refer to the Growth and Spatial Strategy Options Appraisal set out in Appendix 1.

- 4.1.4 In terms of the spatial options, the preferred option (option 2) responds to the phosphate water quality issues in the upper River Wye by amending the spatial strategy to avoid new growth in the upper River Wye catchment, including the primary settlement of Monmouth. While this means that the strategy would be unable to deliver the Council's objectives in those settlements in the phosphate affected catchment, this option would address our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergency, and as such is considered the most appropriate spatial strategy option.
- 4.1.5 It is recognised that the preferred spatial option is unable to deliver the Council's objectives, including the delivery of new affordable homes, in those settlements in the upper River Wye catchment. In the absence of identified strategic solutions to the treatment of phosphates in the upper River Wye catchment area during the Plan period, this shortcoming is unavoidable and it is not possible to allocate sites for new growth (homes and employment) in the affected river catchment. In contrast, strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area which enables sustainable growth within the most sustainable settlements within the River Usk catchment area over the Plan period. The southern part of the County remains unaffected by this issue. Accordingly, Spatial Option 2 performs less positively overall than Option 1 against ISA themes, particularly, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The significance of effects is uncertain, reflecting the absence of growth at key settlement Monmouth, and other settlements in the upper River Wye catchment area. For further details on the spatial options refer to the Options Appraisal in Appendix 1.
- 4.1.6 The preferred growth and spatial options would best achieve sustainable balanced deliverable outcomes by:
- Delivering a level of growth (homes and jobs) that addresses our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, whilst having regard to WG officer concerns regarding alignment with Future Wales: the National Plan 2040.
 - Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites which would help to tackle Monmouthshire's housing need,

homelessness and social inequality. This approach would also enable the Council to consider alternative mechanisms for delivering affordable homes.

- Providing a wider choice of smaller homes to enable younger people to live and work in Monmouthshire which would make our ageing communities more socially and economically sustainable.
- Requiring new homes to be zero carbon ready, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements¹⁴. This would limit the impacts of climate change and ensure good placemaking principles of attractive, accessible places to live and work that have access to sustainable transport links and reduce the need for journeys by the car.
- Promoting sustainable economic growth 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 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.

4.1.7 Overall, it is considered that the Preferred Strategy, based on the above preferred growth and spatial options, strikes a compromise between achieving our local evidence-based objectives that underpinned the Preferred Strategy consulted upon in July – August 2021 and the Welsh Government's response which objected to the level of growth proposed. It also takes account of the phosphate constraint in the upper River Wye catchment. In response, the new Strategy proposes a lower level of growth and an amended spatial strategy that responds to these challenges.

¹⁴ Excluding those settlements in the upper River Wye catchment area due to the lack of an identified strategic solution for the treatment of phosphates at the Monmouth WwTW within the Plan period.

APPENDIX 1

Growth and Spatial Strategy Options Appraisal

This table sets out the demographic, dwelling and jobs growth levels associated with each combined growth and spatial strategy option, together with the benefits and risks, including in relation to the ability of each strategy option to meet our objectives and address our key issues, the impact on plan preparation and deliverability of the RLDP.

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
<p>1. Previous 2021 Preferred Strategy (as consulted on July-August 2021)</p>	<ul style="list-style-type: none"> • Population growth: 12,443 (+13.2%) • Net Migration: 18,345 • Dwellings: Total provision approx. 7,605-8,366* homes, including 2,170 - 2,450 affordable homes • Existing Landbank: approx. 4,710 homes** • New Allocations: approx. 2,900 - 3,660 homes, including 1,210 - 1,490 affordable homes. • Jobs: Policy support to provide for 7,215 jobs*** 	<ul style="list-style-type: none"> • This option would deliver key outcomes. • Based on robust and credible local evidence • Address key RLDP local evidence-based issues & objectives across the County, including in relation to the delivery of affordable homes, balancing our demography and supporting sustainable economic development. • Momentum on finding solutions to Phosphates • Would be no need to re-consult on the Preferred Strategy which would save time in the Plan preparation process, with earlier Plan adoption and less time without an up-to-date RLDP and associated impacts. • Sufficient level of growth to enable the Council to consider alternative mechanisms for delivering affordable homes for our communities. • Aligns with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 by supporting rural communities and delivering affordable homes. 	<ul style="list-style-type: none"> • Finding an evidenced strategic solution for phosphate mitigation in the upper River Wye catchment highly improbable during the Plan period, meaning that the strategy could not be delivered. • Without an identified strategic phosphate solution for the upper River Wye catchment, the strategy would be at odds with the Council’s Climate and Nature Emergency Declaration and the emerging Motion for Oceans and Rivers, and would likely result in an NRW objection • WG objection letter would need to be addressed – level of growth considerably higher than prescribed WG level of growth. • The housing trajectory would be questionable given level of growth and Plan period remaining.

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
		<ul style="list-style-type: none"> • Would meet key tests of soundness, including Test 2¹⁵ • Evidence base would inform the emerging SE Wales Strategic Development Plan (SDP). 	

¹⁵ Development Plans Manual (WG, March 2020): Soundness Test 2 'Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) • Is it locally specific? • Does it address the key issues? • Is it supported by robust, proportionate and credible evidence? • Can the rationale behind the plan's policies be demonstrated? • Does it seek to meet assessed needs and contribute to the achievement of sustainable development? • Are the vision and the strategy positive and sufficiently aspirational? • Have the 'real' alternatives been properly considered? • Is it logical, reasonable and balanced? • Is it coherent and consistent? • Is it clear and focused?'

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
<p>2. Demographic-led strategy¹⁶ and an amended spatial strategy to take account of the phosphate constraint in the upper River Wye Catchment</p>	<ul style="list-style-type: none"> • Population growth: 9,480 (+10.9%) • Net Migration: 13,950 • Dwellings: Total provision approx. 5,400 – 5,940* homes, including 1,580 – 1,850 affordable homes • Existing Landbank: approx. 3,740 homes**** • New Allocations: approx. 1,660 – 2,200 homes, including 830 – 1,100 new affordable homes***** • Jobs: Policy support to provide 6,240 jobs*** 	<ul style="list-style-type: none"> • Would deliver growth (homes and jobs) that addresses our locally evidence-based issues and objectives in the south of the County and River Usk catchment area, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, therefore delivering key outcomes. • Closer alignment between MCC’s preferred growth level and the level of growth prescribed by WG’s July 2021 letter. • All new dwelling allocations would be required to deliver 50% affordable housing, maximising the delivery of essential affordable homes and socially sustainable communities. • Sufficient level of growth to enable the Council to consider alternative mechanisms for delivering affordable homes for our communities. • Spatial strategy would avoid those areas affected by phosphates and without an identified feasible solution. • Aligns with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 by supporting our rural communities and delivering affordable homes. 	<ul style="list-style-type: none"> • Would not deliver key outcomes/address local evidence-based issues in the upper River Wye catchment settlements, creating further inequality, however the environmental constraint makes this unavoidable at present. • No affordable housing delivery within Wye Catchment settlements, including Monmouth. • This option would require the Council to reconsult on an updated Preferred Strategy which would add time to the RLDP process, meaning a longer period without an up-to-date plan. • Limited Plan period left on adoption (approx. 8.5 years) which means there is less time to deliver the Plan’s growth, impacting on the housing trajectory. • Viability – would need to evidence that the provision of 50% affordable housing on new sites is viable. This could be challenging in view of our other policy requirements including in relation to zero carbon ready homes and associated infrastructure to support the development. Social Housing Grant (SHG) or other public funding may be required for some sites, requiring a change to current SHG rules.

¹⁶ demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying the same assumptions as the existing Preferred Strategy in relation to migration, household membership rates and commuting ratio.

Options	Population, Dwellings and Jobs Growth over the Plan Period 2018-2033	Benefits	Risks
		<ul style="list-style-type: none"> • Would meet key tests of soundness, including Test 2¹⁷ • Evidence base would inform the emerging SE Wales Strategic Development Plan (SDP). Simplified strategy. 	

¹⁷ As footnote 1 above.

<p>3. WG Prescribed 10-year Past Build Rate, combined with an amended spatial strategy which takes account of the phosphate constraint in the upper River Wye Catchment</p>	<ul style="list-style-type: none"> • Population growth: 8,050 (+9.3%) • Net Migration: 12,450 • Dwellings: approx. 4,280 – 4,700, including 940 – 1,150 affordable homes • Existing Landbank: approx. 3,940 homes**** • New Allocations: approx. 330 – 760 homes, including 170-380 affordable homes***** • Jobs: Policy support to provide 4,290*** 	<ul style="list-style-type: none"> • Addresses WG’s consultation response to the RLDP Preferred Strategy (August 2021). • Less environmental impact. • Spatial strategy would avoid those areas affected by phosphates and without an identified feasible solution. • Simplified strategy. 	<ul style="list-style-type: none"> • This minimum level of growth is not based on robust and credible local evidence and would not meet our objectives or address our local evidence-based issues (including affordable housing delivery, balancing our demography and more generally supporting our communities) and as such would not meet key tests of soundness at Examination, including Test 2¹⁸. • Would not deliver the Administration’s manifesto commitment to maximise affordable housing delivery via 50% affordable housing provision on new housing sites as there would be very few new site allocations. This minimal level of provision would make minimal contribution towards addressing our affordable housing need in the County, as evidenced in the LHMA. • Lack of associated investment towards community infrastructure given limited new housing allocations. • This option would not support sustainable economic growth /prosperity and would exacerbate our existing key local issues including housing affordability, homelessness, ageing demographic and rural isolation. As such this option would not deliver on Council’s priority of addressing inequality. • Would not align with Policies 4, 5 and 7 of Future Wales: the National Plan 2040 as this level of growth would not support our rural
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			<p>communities (homes and jobs) or delivery much needed affordable housing.</p> <ul style="list-style-type: none">• This option would require the Council to reconsult on an updated Preferred Strategy which would add time to the RLDP process, meaning a longer period without an up-to-date adopted plan.• Concern that the lack of ambition associated with the growth level and its negative implications for our local communities would be replicated in the emerging SDP. Local evidence-based issues, including affordability, demography and inequality, would be exacerbated over the longer term via the regional plan.
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*includes 10% flexibility allowance

** The 2021 Preferred Strategy landbank figures included LDP Rollover applications, land supply commitments and allowances within the Wye Valley and the sites taken out due to non-delivery. It did not include completions for 2021/22.

*** Job figures are at a Unitary Authority level as small area data is not available. All other figures refer to the Local Planning Authority area, i.e. excluding Brecon Beacons National Park.

****The new 2022 option's landbank excludes existing land supply commitments and allowances within the upper River Wye catchment. Land bank also excludes LDP Rollover sites and sites taken out due to non-delivery. It includes completions for 2021/22.

***** Based on all RLDP site allocations being 50% affordable housing.