

# Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan (RLDP)

**ISA Report accompanying the Deposit Plan**

Monmouthshire County Council

September 2024

## Quality information

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# 1. Introduction

## 1.1 Background

1.1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Monmouthshire County Council's Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WFG).

## 1.2 ISA Explained

1.2.1 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.

1.2.2 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.

## 1.3 Sustainability Appraisal (SA)

1.3.1 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>. It also widens the scope of the assessment from focusing largely on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Development Plans under Section 19(5) of the Planning and Compulsory Purchase Act 2004.

1.3.2 In line with the requirements of the SEA Directive, the two key steps in SA are that:

1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

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<sup>1</sup> Directive 2001/42/EC

- 1.3.3 The LDP Manual Edition 3 (2020) states that SA, incorporating SEA, plays an important part in demonstrating that the LDP is sound by ensuring that it reflects the legislative requirements and achieves sustainable development.

## 1.4 Equalities Impact Assessment (EqIA)

- 1.4.1 As a public-sector organisation, Monmouthshire Council has a duty under the Equality Act 2010<sup>2</sup> and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the RLDP avoid unlawful discrimination (direct and indirect), instead, advancing equality of opportunity and fostering good relations between those with protected characteristics<sup>3</sup> and all others.
- 1.4.2 In March 2021 the Socio-economic Duty commenced, which compliments the Equalities Act and PSED by further contributing towards Wales' long term well-being goals, in particular "A more equal Wales" and "A Wales of cohesive communities". Further strengthening social partnership arrangements and advancing fair work ambitions.<sup>4</sup>
- 1.4.3 An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

## 1.5 Health Impact Assessment (HIA)

- 1.5.1 The Public Health (Wales) Act 2017 contains a provision to require a Health Impact Assessment (HIA) to be carried out to assess the likely effect of the proposed development plan on health and mental well-being and inequality. The HIA process provides a systematic yet flexible and practical framework that can be used to consider the wider effects of LDP policies and how they, in turn, may affect people's health.

## 1.6 Welsh Language Impact Assessment (WLIA)

- 1.6.1 The Welsh Government is committed to supporting the Welsh Language so that it can thrive and grow across Wales. The Welsh Language must be considered from the outset of the development plan process. It is a legislative requirement that the SA must include an assessment of the likely effects of the plan on the use of the Welsh language (The Planning (Wales) Act 2015 (Section 11)).
- 1.6.2 Planning Policy Wales (PPW) (2024) sets the policy requirements for Welsh language. Technical Advice Note 20: Planning and the Welsh Language provides guidance on the consideration of Welsh language as part of the development plan process. The TAN provides advice on incorporating the Welsh language in development plans through the SA and the policy approach to anticipated windfall development. In summary, planning authorities must consider the likely effects of their development plans as part of the SA process and include a statement within the Deposit Plan on how this has been considered and or addressed within the development plan.

<sup>2</sup> Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>

<sup>3</sup> Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

<sup>4</sup> Welsh Government (2020) A more equal Wales: strengthening social partnership white paper [online] available at: <https://gov.wales/more-equal-wales-strengthening-social-partnership-white-paper>

The ISA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

## 1.7 Wellbeing of Future Generations (Wales) Act 2015

- 1.7.1 The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the Well-being of Future Generations (Wales) Act 2015 (WBFGA).
- 1.7.2 “Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.
- 1.7.3 The WBFGA sets seven well-being goals which all public bodies are required to achieve:
- A prosperous Wales;
  - A resilient Wales;
  - A healthier Wales;
  - A more equal Wales;
  - A Wales of cohesive communities;
  - A Wales of vibrant culture and thriving Welsh language; and
  - A globally responsible Wales.
- 1.7.4 The Act also identifies five ways of working which public bodies need to demonstrate they have carried out when undertaking their duty to achieve sustainable development. These are: involvement, collaboration, integration, prevention and long term factors. The well-being goals and the five ways of working can be used to inform and structure the ISA framework.

## 1.8 This ISA Report

- 1.8.1 This ISA Report<sup>5</sup> is published alongside the Deposit Plan. It leads on from the Initial ISA Report published in November 2022, taking into consideration feedback from consultation and the subsequent updates to the RLDP. Any representations received will be considered when the Plan is finalised for submission.

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<sup>5</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

## 2. What is the RLDP Seeking to Achieve?

### 2.1 Background

2.1.1 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of the Council's purpose of becoming a zero-carbon County, supporting well-being, health and dignity for everyone at every stage of life. The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP builds upon the current adopted LDP which covers the period 2011-2021.

### 2.2 Issues, Challenges, and Opportunities

2.2.1 The key issues, challenges and opportunities/ drivers facing the County (economic, environmental, social, and cultural) are set out in the RLDP Issues, Vision, and Objectives Paper (updated September 2024). The Issues have been grouped to align with the seven Well-being Goals as set out in the Well-being of Future Generations (Wales) Act 2015 to ensure that they are framed within this context. A summary of the key issues and challenges as set out by the Council are presented below:

- We have the highest average house prices in Wales. This means a large proportion of people cannot afford to buy a home so either leave the County, or have to live with their parents or in shared housing for longer. We have 2,064 households identified as being in need of affordable housing<sup>16</sup>. The RLDP explores opportunities to increase the number of affordable homes and ensure a range and choice of homes, both market and affordable, are incorporated within new developments.
- Our population is getting older. By 2033 we will have more people over the age 65+ living in the County but fewer young people. The 2021 Census identifies that nearly 26% of the population in Monmouthshire is over 65 (compared to 21% in Wales), with 16% under the age of 16 (18% in Wales) and just over 58% of working age (16-64) (61% in Wales). An older population changes the kind of services our communities will need, but also reduces the number of people using and financially supporting businesses and services. We will have a smaller economically active population making Monmouthshire a less attractive place for businesses to locate. This impacts on our future economic prospects. By increasing the supply of affordable housing we can retain a larger number of younger people in the County, increasing the sustainability of our economy and public services.
- The Council has declared a climate and nature emergency and has set out a commitment to strive to reduce its own carbon emissions to net zero



in line with the Welsh Government target of 2030, together with a strengthened emphasis on nature recovery. The RLDP provides the land use policy framework to address the climate and nature emergency together, seeking outcomes that recognise the role resilient ecosystems can play in tackling carbon emissions and mitigating the impact of climate change. The RLDP establishes policy to support and enable renewable energy generation and sets out the requirements for net zero carbon developments and other sustainable development principles such as active travel, green infrastructure and local food production. These sit alongside and integrate with policies for protection of sites designated for biodiversity, habitats and species and deliver on Net Biodiversity Benefit. The requirement that all future housing is net zero carbon is intended to reduce overall carbon emissions. The requirement that new strategic sites for housing are within walking distance of existing town centres is also intended to reduce carbon emissions.

- We have an urgent need to tackle water quality and phosphate pollution in our rivers. Natural Resources Wales (NRW) has adopted tighter targets for river water quality and have put in place a requirement to achieve phosphate neutrality or betterment in the River Usk and River Wye. In recognition of the water quality issues in the County, the Climate and Nature Emergency Strategy and associated action plans outline steps the Council will take to protect our rivers and ocean.
- There is a need to consider whether existing employment land is suitably located and fit for purpose, along with the potential increase in agile and home working and the impact this may have on employment land demand/requirements. We also need to consider future demand in line with Council aspirations and the opportunities that a shift in working behaviour could create with businesses given greater flexibility over where to locate.
- Monmouthshire benefits from its involvement in regional partnerships including the Cardiff Capital Region City Deal, Marches Forward Partnership and The Western Gateway. Opportunities associated with such partnership working include economic investment/innovation and transport and digital connectivity. Further details are provided in Appendix 3.
- Unemployment levels are low; however, Monmouthshire has a dual economy. The qualifications, skills and earnings of the residents are above the regional and national average, however, for those working in the area earnings are lower and employment is relatively less skilled. Monmouthshire has a net-outflow of commuters. Those who commute out of the County are higher earners than those who commute into the County. To address these issues there is a need to provide support for inward investment and local employment growth/opportunities as identified in the Economy, Employment and Skills Strategy.
- Vacancy rates in some of the County's town and local centres have increased<sup>17</sup> due to changing shopping habits including internet shopping and economic factors such as inflation diminishing the disposable income of many households.

- There are challenges of rural isolation and sustaining rural communities, including regenerating the rural economy. The pandemic emphasised the value and importance of having locally accessible services and facilities.
- We want to protect the landscapes and heritage that make Monmouthshire a unique and attractive place to live. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and recreation.
- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy and in sustaining the County's historic town centres. According to figures supplied by tourism economic indicator STEAM (Scarborough Tourism Economic Activity Monitor), the sector brought in £285m to Monmouthshire in 2022 and supported the equivalent of 3,356 full-time jobs (STEAM report 2022).

2.2.2 The key opportunities to realising some of the issues/ challenges are set out overleaf.

### **Future Wales: The National Plan 2040 (February 2021)**

2.2.3 Future Wales sets out the national development framework and direction for development in Wales to 2040, it contains a number of policies that are considered to be of particular relevance to Monmouthshire providing the national policy context to address key issues facing Monmouthshire.

2.2.4 Policy 3 – Supporting Urban Growth and Regeneration - Public Sector Leadership - sets out that Welsh Government will play an active role in the delivery of growth and urban regeneration, working with local authorities to unlock the potential of public land and support local authorities to take an increased development role. Of note Policies 4 – Supporting Rural Communities and Policy 5 – Supporting the Rural Economy, provide the policy framework to consider how age balanced communities can be achieved, where depopulation should be reversed and allowing for sustainable, appropriate and proportionate economic growth. Policy 7 – Delivering Affordable Homes, also addresses the key issue of affordable housing prices in the County and provides the framework to address this through affordable housing led developments. These policies are considered to provide significant opportunities to address a number of the key issues facing the County.

### **Building Better Places: The Planning System Delivering Resilient and Brighter Futures. Placemaking and the Covid-19 Recovery (July 2020)**

2.2.5 The Covid-19 pandemic has resulted in many challenges, but it has also resulted in some significant changes in how we operate our daily lives and use the neighbourhood spaces around us. Welsh Government's Building Better Places Covid-19 recovery policy document recognises this, and the opportunity it has created to continue with some of the shifts in behaviour and the increased importance on placemaking that have been highlighted as a result of Covid-19. In this respect, the RLDP is recognised as a key mechanism in delivering the planning policy priorities identified in the

Building Better Places document to assist in the Covid-19 recovery and maintaining and enabling the sustainable improvements that have arisen from the situation. Examples include greater emphasis on creating neighbourhoods that enable residents to stay and move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Similarly, the importance of digital connectivity and necessity to incorporate sufficient infrastructure in developments from the outset has been highlighted, particularly in rural areas.

## **Climate and Nature Emergency and Motion for the Rivers and Ocean**

- 2.2.6 In May 2019, the Council declared a Climate Emergency and published an updated Climate and Decarbonisation Strategy and Action Plan in November 2021, with strengthened emphasis on nature recovery in recognition of the nature emergency. This sets out key actions the Council will take to reduce its own carbon emissions to net zero in line with Welsh Government's target of 2030, but also make a commitment to work with partners and organisations to develop and implement best practice in limiting global warming to less than 1.5°C. As recognised by PPW12 and Building Better Places, the RLDP and its policy framework and allocations provide a significant opportunity to address the causes and effects of climate change. It is recognised that efforts to tackle climate change are wide-ranging and will require a co-ordinated approach to development including aspects such as active travel, green infrastructure, effective use of land and resources and flood resilience.
- 2.2.7 In recognition of urgent need to address water quality in the County the Climate Emergency Action Plan November 2021 update, included the addition of an action on addressing water quality, establishing the requirement to prepare an action plan specifically on water quality. In March 2022 the Motion for the Rivers and Ocean was agreed by Council with the associated Action Plan agreed in September 2022. This sets out measures and to tackle river quality and the partnerships in place to provide a co-ordinated approach to the issue. Of particular relevance to the RLDP is the ongoing work with NRW and Welsh Water and continued involvement with the Wye Nutrient Management Board and the Usk Catchment Partnership to identify and implement options for delivering improvements in water quality.

## **Cardiff Capital Region City Deal**

- 2.2.8 The overarching economic objectives of the City Deal are to create 25,000 new jobs and leverage £4 billion in private sector investment across the region. Key themes have been identified to focus the approach: Connecting the Region; Regeneration and Infrastructure; Skills and Employment. These strategic themes present opportunities for the RLDP including:
- Connecting the Region – Digital Strategy: this aims to create a smart region, driving innovation and solutions to attract private sector partnership and investment, including Welsh and regional connectivity, mobile 5G access and maximising open data.

- Metro – the South East Wales Metro Project provides much needed opportunities to increase train service frequency, improve inter-modal connectivity and coordination, streamline ticketing and improve bus services.
- Regeneration and Infrastructure – the Housing and Investment Fund supports the delivery of more homes across the region. This includes assistance in stimulating the SME sector across the region by providing loan development finance and launching a Customer Build Scheme releasing smaller plots of public sector land with a full package of support for SMEs to deliver new homes.
- Skills and Employment – the Skills for the Future Project provides region-wide school engagement with pupils and parents to offer careers advice and guidance, support for businesses to address barriers of participation, including a skills investment fund and a commitment to support delivery of over 10,000 additional apprenticeships, graduate internships and upskilled employees in the private sector.

## **Monmouthshire 2040: Our Economic Growth and Ambition Statement and Inward Investment Prospectus 2020: Growing your Business in Monmouthshire**

- 2.2.9 The Council's Economic Growth and Ambition Statement and Prospectus set out the aspirations to raise the profile of Monmouthshire as a dynamic place to do business, a credible place to invest and an incredible place to live, visit and stay. It recognises that Monmouthshire's economy needs to grow to help build sustainable and resilient communities and to achieve the Community and Corporate Plan (April 2023) objective of being a thriving and ambitious place, where there are vibrant town centres, where businesses can grow and develop.
- 2.2.10 The Economic Growth and Ambition Statement and accompanying Prospectus and emerging Economic Development Strategy will work alongside the RLDP and will assist in:
- Raising the profile of Monmouthshire as a key investment opportunity for the private sector.
  - Attract funding and investment to Monmouthshire to attract and facilitate economic growth to the County.
  - Increasing the take up of apprenticeships and reducing the number of residents who are not in education, employment or training.
  - Increasing next generation access broadband and mobile phone coverage across the County.

## **2.3 Vision and Objectives of the RLDP**

- 2.3.1 The RLDP Vision outlines how the County is planned to develop, change, or be conserved up to 2033, and provides the framework for the Plan's strategy and policies. The Vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County, key elements of the Gwent PSB Well-being

Plan (August 2023) and MCC's Taking Monmouthshire Forward - Community and Corporate Plan 2022-2028 (April 2023).

***By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:***

- ***People are living in inclusive, equal, safe, cohesive, prosperous, and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space, and employment opportunities.***
- ***Communities and businesses are part of an economically thriving, ambitious, and well-connected County.***
- ***The best of the County's built heritage, countryside, biodiversity, landscape, and environmental assets have been protected and enhanced to retain its distinctive character.***
- ***People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero-carbon County.***

2.3.2 To address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP, which build upon the Adopted LDP objectives. The objectives are kept under review and updated as necessary as part of the continued development of the RLDP evidence base.

2.3.3 The objectives are set out in Table 2.1 and have been grouped to align with the 7 wellbeing goals set out in the Wellbeing of Future Generation (Wales) Act 2015, and the RLDP issues, as well as the main policy themes identified in Planning Policy Wales (PPW12), the Gwent PSB Wellbeing Plan steps, and the Council's Community and Corporate Plan.

**Table 2.1: RLDP objectives and their contributions to wellbeing goals**

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
<b>A Prosperous Wales (Well-being Goal 1)</b>						
<b>Objective 1</b>	Economic Growth/ Employment	To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow on spaces.	1, 2, 3, 4, 5, 6, 7, 24	Productive and enterprising places	Take action to reduce the cost-of-living crisis in the longer term.	A Thriving and Ambitious Place.
<b>Objective 2</b>	Town and Local centres	To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth, and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.	8	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. Enable and support people, neighbourhoods,	A Thriving and Ambitious Place.

<sup>6</sup> See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
<b>A Resilient Wales (Well-being Goal 2)</b>						
<b>Objective 3</b>	Green Infrastructure, Biodiversity and Landscape	To protect, enhance and manage the resilience of Monmouthshire’s natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health, and well-being. This includes the Wye Valley National Landscape (AONB), the County’s other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests.	11, 12, 35	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
<b>Objective 4</b>	Flood risk	To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need	12, 13	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore	A Green Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.			our natural environment.	
<b>Objective 5</b>	Minerals and Waste	To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.	14, 15	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.
<b>Objective 6</b>	Land	To promote the efficient use of land, including the need to: <ul style="list-style-type: none"> <li>• maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire.</li> <li>• protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development.</li> </ul>	16, 17	Strategic and spatial choices	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live.



RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		<ul style="list-style-type: none"> <li>support the adaptation and re-use of existing sustainably located buildings.</li> </ul>				
<b>Objective 7</b>	Natural resources	To ensure the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.	14, 15, 31, 37	Productive and enterprising places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Safe Place to Live.
<b>A Healthier Wales (Well-being Goal 3)</b>						
<b>Objective 8</b>	Health and Well-being	To improve access for all to recreation, sport, leisure activities, open space, and the countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs.	18, 20, 21, 33, 35	Active and social places	Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles.	A Fair Place to Live. A Safe Place to Live. A Connected Place Where People Care.
<b>A More Equal Wales (Well-being Goal 4)</b>						

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
<b>Objective 9</b>	Demography	To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.	2, 3, 4, 5, 24	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.
<b>A Wales of Cohesive Communities (Well-being Goal 5)</b>						
<b>Objective 10</b>	Housing	To provide urgently needed affordable housing within exemplar, mixed, sustainable, and well-connected places both for existing and future residents.	23, 25, 26, 27, 28	Active and social places	Provide and enable the supply and good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
<b>Objective 11</b>	Place-making	To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe, and accessible places to live, work and visit; and promote people's prosperity, health, happiness, and well-being.	1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Thriving and Ambitious Place. A Safe Place to Live.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
<b>Objective 12</b>	Communities	To ensure Monmouthshire is a connected place where people feel part of a community, are valued, and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.	1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35	Strategic and spatial choices	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place to Live. A Green Place. A Thriving and Ambitious Place. A Safe Place to Live. A Connected Place Where People Care. A Learning Place.
<b>Objective 13</b>	Rural Communities	To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy.	6, 7, 20, 22, 26, 29, 30, 34	Productive and enterprising places	Provide and enable the supply of good quality, affordable, appropriate homes.	A Fair Place to Live. A Safe Place to Live.
<b>Objective 14</b>	Infrastructure	To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in	12, 19, 20, 31	Productive and enterprising places	Enable and support people, neighbourhoods, and communities to be resilient,	A Green Place to Live. A Thriving and Ambitious Place.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
		place or can be provided to accommodate new development.			connected, thriving and safe.	A Connected Place Where People Care. A Learning Place.
<b>Objective 15</b>	Accessibility	To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car.	10, 30, 36	Active and social places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Green Place to Live. A Thriving and Ambitious Place.
<b>A Wales of Vibrant Culture &amp; Thriving Welsh Language (Well-being Goal 6)</b>						
<b>Objective 16</b>	Culture, Heritage and Welsh Language	To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.	9, 32, 33, 34, 35	Distinctive and natural places	Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.	A Fair Place. A Thriving and Ambitious Place. A Connected Place Where People Care.

RLDP Objective	Headline	RLDP Objective	RLDP issues addressed <sup>6</sup>	Main PPW12 theme	Gwent PSB Well-being Plan Steps	Community & Corporate Plan Objectives
<b>A Globally Responsible Wales (Well-being Goal 7)</b>						
<b>Objective 17</b>	Climate and Nature Emergency	To strive to limit the increase in global temperatures to 1.5°C, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure.	10, 12, 36, 37, 38	Distinctive and natural places	Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment.	A Green Place to Live. A Thriving and Ambitious Place. A Safe Place to Live.

## 3. What is the Scope of the ISA?

### 3.1 Introduction

3.1.1 The aim here is to introduce the reader to the scope of the ISA, meaning the sustainability issues/ objectives that should be a focus of (and provide a broad methodological framework for) ISA.

### 3.2 Consultation on the Scope of the ISA

3.2.1 The Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies*”. In Wales, the consultation bodies are Natural Resources Wales and Cadw.<sup>7</sup> A Scoping Report was sent to the statutory consultees for comment from 26th October to 30th November 2018. The responses received were considered and amendments made to the baseline information and draft ISA Objectives where necessary. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives - however, the scope remains fundamentally like that agreed through the dedicated scoping consultation in 2018. Baseline updates, such as new Census data, have been considered through the subsequent assessment process.

3.2.2 Further information on the scope of the ISA - i.e., a more detailed review of sustainability issues/ objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ – is available to view separately via MCC.

### 3.3 ISA Objectives

3.3.1 Table 3.1 presents the ISA objectives - grouped under ten theme headings - established through scoping, considering context/baseline review, identified key issues and responses from statutory consultees.

3.3.2 Taken together, the ISA themes and objectives presented in Table 3.1 provide a methodological ‘framework’ for appraisal.

**Table 3.1: ISA Framework**

ISA theme	ISA objective
<b>Economy and Employment</b>	Deliver sustainable economic growth by strengthening the local economy, promote tourism and enhance the vitality and viability of town centres.
	Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.

<sup>7</sup> In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

ISA theme	ISA objective
<b>Population and Communities</b>	Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.
	Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.
<b>Health and well-being</b>	To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.
<b>Equalities, diversity, and social inclusion</b>	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.
<b>Transport and Movement</b>	To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities.
<b>Natural Resources (Air, Land, Minerals and Water)</b>	To reduce all forms of air pollution in the interests of improving local air quality.
	To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.
	To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use, and recycling.
	To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.
<b>Biodiversity and Geodiversity</b>	To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.
<b>Historic Environment</b>	To conserve and enhance the significance of the County's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings.
<b>Landscape</b>	To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.

<b>ISA theme</b>	<b>ISA objective</b>
<b>Climate Change</b>	To promote and encourage energy generation from renewable sources and energy efficiency.
<b>Flood Risk</b>	Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.



## 4. Plan-making and ISA to Date

### 4.1 Regulatory Requirements

4.1.1 In line with regulatory requirements, there is a need to explain how work undertaken to date has informed plan-making, in particular, how work has been undertaken to develop and then appraise reasonable alternatives, and how the Council have considered appraisal findings when developing the preferred approach for the RLDP. This information is important given regulatory requirements.<sup>8</sup>

### 4.2 Structuring the Work to Date

4.2.1 A review of the LDP has been underway since 2018, with a wide range of evidence produced to inform plan-making. Table 4.1 sets out the key RLDP and ISA documents published to date, along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.<sup>9</sup>

**Table 4.1: RLDP and ISA documents published to date**

<b>RLDP Documents and Consultation</b>	<b>ISA Documents and Consultation</b>
	ISA Scoping Report 2018 - Sent to statutory consultees for consultation from 26 <sup>th</sup> October to 30 <sup>th</sup> November 2018.
Issues, Vision, and Objectives Paper (January 2019 as amended June 2021)	
Growth and Spatial Options Consultation Paper - Public consultation from July to August 2019	
Preferred Strategy Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020))	Initial ISA Report and NTS 2020 Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020))
RLDP Review of Issues, Vision, Objectives and Evidence Base in light of Covid-19 (September 2020) This Review was agreed by Council on 22 October 2020 and submitted to the Welsh Government in accordance with Ministerial advice	

<sup>8</sup> There is a requirement for the ISA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

<sup>9</sup> [Replacement Local Development Plan \(RLDP\) - 2018-2033 - Monmouthshire](#)

**RLDP Documents and Consultation****ISA Documents and Consultation**

Revisited RDLP Growth and Spatial Options Consultation Paper  
Public consultation from January to February 2021

ISA of Strategic Options Report 2021  
Public consultation January to February 2021

Sustainable and Resilient Communities Preferred Strategy  
Public consultation from July to August 2021

Initial ISA Report and NTS 2021  
Public consultation from July to August 2021

Preferred Strategy, December 2022  
Public consultation from December 2022 to January 2023

Initial ISA Report and NTS 2022  
Public consultation from December 2022 to January 2023

- 4.2.2 With a number of Initial ISA Reports published to date, this ISA Report sets out the work that has been undertaken to develop and appraise reasonable alternatives, considering feedback from consultation at each stage and subsequent changes to the preferred strategy.
- 4.2.3 For clarity, **Chapter 5** details how reasonable alternatives have been established considering the available evidence and feedback from consultation, **Chapter 6** presents a summary of the appraisal of reasonable alternatives (with detailed appraisals provided in appendices), and **Chapter 7** explains the Council's reasons for selecting the preferred approach.

## 5. Establishing Reasonable Alternatives

### 5.1 Introduction

5.1.1 This chapter explains the evidence and work carried out to date to identify strategic options, or reasonable alternatives. To deliver the vision and objectives detailed in Chapter 2, the Council have explored **how much growth** (housing and employment) is required over the plan period (2018-2033) and **where this growth could be located** in the County. Each of these issues are discussed in turn below.

### 5.2 Level of growth options (2020)

- 5.2.1 In early development stages of the RLDP, Monmouthshire, Torfaen, and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the RLDP. A total of 20 different demographic-led, housing-led, and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 medium, and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.
- 5.2.2 The Council took time to consider these options, consultation responses received, and informal feedback from Welsh Government officials; which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs. A decision was subsequently taken to commission Edge Analytics to model an additional demographic-led scenario. This scenario sought to address two of the key issues/ challenges facing the County in relation to retaining/ attracting younger adult population age groups and improving labour force retention.
- 5.2.3 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out. An appraisal of the three grouped options were presented in the Initial ISA Report and consulted upon in March 2020.

### 5.3 Level of growth options (2021)

- 5.3.1 The Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.
- 5.3.2 The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and

the Well-being plan for a plan area, form a fundamental part of the RLDP evidence base. These were considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area.

- 5.3.3 The 2020 publication of corrected Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.
- 5.3.4 To take account of the latest evidence, an Updated Demographic Evidence Report (November 2021) was prepared by Edge Analytics, which set out a range of updated growth options for the RLDP.<sup>10</sup>
- 5.3.5 A total of fourteen different scenarios were generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA. In addition to the initial modelling, all six selected options were the subject of additional testing to establish the impact on demography, dwellings, and household formation and employment of an affordable-housing policy-led strategy.
- 5.3.6 The six growth options identified in the Growth and Spatial Options Paper (December 2020) were assessed through the ISA in early 2021. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.<sup>11</sup>

## 5.4 Level of growth options (2022)

- 5.4.1 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and required further consideration. In terms of the level of growth, Welsh Government (WG) raised significant concerns regarding the proposed level of growth and the Strategy's 'general conformity' with policies 1 and 33 of Future Wales: The National Plan 2040. This suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport, and the Valleys.
- 5.4.2 WG's consultation response took the unprecedented step of prescribing a maximum growth of 4,275 dwellings for Monmouthshire to 2033. This is considerably lower than the Preferred Strategy dwelling requirement that was consulted on (7,605 dwellings) and would result in barely any new housing allocations over RLDP period due to the existing housing landbank.
- 5.4.3 MCC considered that this approach would fail to deliver on key locally evidenced issues and objectives including affordable housing delivery, economic growth/prosperity and rebalancing the demography, to the

<sup>10</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

<sup>11</sup> AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan  
<https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>

detriment of the sustainability of the County's communities. MCC also felt it would fail to accord with policies 4, 5 and 7 of Future Wales: The National Plan 2040, which specifically support rural communities and seek to increase the delivery of affordable homes throughout Wales.

- 5.4.4 On 14th December 2021, a special meeting of the Council's Economy and Development Select Committee considered the implications of the WG Planning Division's response on Monmouthshire's communities and on addressing the locally evidence-based outcomes and objectives.
- 5.4.5 MCC considered that the WG letter poses a significant challenge for the Preferred Strategy. Namely, that an amended RLDP that follows the letter's requirements would not meet the tests of soundness at examination because it would not address the evidence-based issues or achieve the required outcomes. Conversely, proceeding as originally proposed would also be a high-risk strategy.
- 5.4.6 Consequently, MCC considered revised growth options which support lower dwelling requirements. These options were subject to appraisal in the Initial ISA Report 2022, alongside the growth strategy consulted on in 2021. These options are summarised below:
- **Option 1:** Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
  - **Option 2:** Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
  - **Option 3:** WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

## 5.5 Feedback from consultation and level of growth options in 2024

- 5.5.1 In 2022, the Council's preferred approach was Option 2 as this would reduce the level of growth proposed compared to the 2021 Preferred Strategy which WG objected to, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing and retaining young people with access to new jobs.
- 5.5.2 At this stage (in 2024) no new evidence has emerged or is being considered that changes the alternatives developed in 2022 and these three options remain valid and up to date for the purposes of this ISA Report. The summary of the appraisal of these options is presented in Chapter 6.

## 5.6 Location of growth options (2020)

- 5.6.1 A total of eight Spatial Options were initially considered and included in the long list of spatial options (set out in Appendix 4 of the Growth and Spatial Options Consultation Paper, July 2019) but three were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, five spatial options were consulted on as part of the Growth and Spatial Options Consultation. Subsequent to this, as with the growth options, two additional spatial options were identified in light of consultation

responses and emerging national policy at the time. Following on from this, a total of seven spatial options were considered through the ISA process in early 2020.

## 5.7 Location of growth options (2021)

- 5.7.1 As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process in 2020 following the publication of the corrected Welsh Government 2018-based population and household projections (August 2020). The RLDP spatial options considered in 2020 were reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2020 consultation included a new settlement. These options were subsequently discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11), which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, focusing growth in the north of the County, was subsequently included as a result of consultation responses on the 2020 Growth and Spatial Options.
- 5.7.2 A total of four broad Spatial Distribution Options were therefore taken forward as realistic options for ISA in 2021 which explored a continuation of the existing LDP strategy, proportionately distributed growth, growth focused on the M4 corridor, and growth focused in the north of the County. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.<sup>12</sup>

## 5.8 Location of growth options (2022)

- 5.8.1 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and require further consideration. In terms of the spatial strategy, this specifically referred to the environmental impacts of phosphate in watercourses.
- 5.8.2 In light of new evidence, Natural Resources Wales (NRW) adopted tighter targets for the water quality of watercourses and conducted an assessment of the nine riverine Special Areas of Conservation (SAC) in Wales. This assessment established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.
- 5.8.3 In response, NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its

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<sup>12</sup> AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan  
<https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>



design and/ or its contribution to the water body. This issue affects the upper (non-tidal) parts of the two rivers.

- 5.8.4 The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the Preferred Strategy that was consulted on in 2021 directed future growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was, therefore, given as to how the RLDP can progress in light of this issue, carefully balancing the need for growth with the climate and nature emergency.
- 5.8.5 Following discussions with Dŵr Cymru/ Welsh Water (DCWW) and NRW, MCC realised that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste Water Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) in 2022 that could be implemented during the Plan period.
- 5.8.6 Without an identified deliverable solution, it would not be possible to demonstrate at examination that sites in the Upper Wye Catchment are deliverable. This means that new site allocations for future growth could not be directed to settlements within the affected Wye catchment area, including the primary settlement of Monmouth, until a feasible solution is identified that can be implemented within a timescale that facilitates development within the Plan period. The restrictions on new housing and employment development in this area during the Plan period had obvious implications for the RLDP spatial strategy.
- 5.8.7 Consideration was therefore given to how to progress the RLDP having regard to the above challenges, whilst also ensuring that the RLDP delivers on the Council's objectives and core issues.
- 5.8.8 MCC subsequently developed a spatial option which did not direct growth to settlements within the affected Wye catchment area, including the primary settlement of Monmouth. This option, alongside the spatial strategy consulted on in 2021, were subject to appraisal in the Initial ISA Report 2022. The two options are summarised below:
- **Option 1:** Distribute growth proportionately across the County's most sustainable settlements.
  - **Option 2:** Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow, and Caldicot, including Severnside, supported by lower growth in the most sustainable rural settlements (excluding those settlements in the Upper Wye catchment area).

## 5.9 Strategic growth areas (2022)

- 5.9.1 In 2020, the Council identified potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a preliminary high-level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. Only strategic sites and

sustainable urban extensions of around 8ha in size and above were considered.

- 5.9.2 The identified strategic growth areas were considered by the Council to have the potential to underpin the Spatial Strategy, by accommodating growth and focusing development within those settlements and areas which are identified as the most sustainable locations.
- 5.9.3 The potential strategic growth options were assessed through the Initial ISA Report 2021 and reproduced in the Initial ISA Report 2022. The strategic growth options were located in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

## 5.10 Feedback from consultation and location of growth options in 2024

- 5.10.1 Since 2022, DCWW have identified strategic improvements at the Monmouth Wastewater Treatment Works that can be implemented by 31<sup>st</sup> March 2025 which has provided WG with sufficient certainty to allow for new growth allocations in the Upper Wye Catchment, including at Monmouth. On this basis, there is no need to continue to assess or develop options that avoid growth in settlements in the Upper Wye Catchment area. The four options developed for ISA in 2021 are therefore considered to be representative of the choices available to the Council at this stage, supported by an assessment of the strategic growth locations which remain the same as reported on in 2021 and 2022.
- 5.10.2 All site options identified through the candidate sites process (by MCC), following the Council's high-level initial sift of sites, have been subject to a GIS analysis. This process has assessed sites against a range of ISA criteria under each of the ISA themes. The method for the assessment and the assessment outcomes are both reported in a separate ISA Technical Annex, and the findings of the assessment, whilst high-level, have informed the assessment of options and allocations in the ISA of the Deposit Plan.

## 5.11 Summary of options (2024)

- 5.11.1 In summary, the discussion in this chapter has identified no new options for assessment at this stage, and previously assessed options are reproduced as the representative choices for the Council in terms of their preferred approach and reasonable alternatives. The choices that are taken forward for assessment in Chapter 6 are:

### Level of growth

- **Option 1:** Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2:** Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3:** WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

### Location of growth



- **Option 1:** Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2:** Proportionately distributed growth – growth would be distributed across the County’s most sustainable settlements with the level of growth proportionate to that settlement’s size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3:** Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4:** Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.

## Strategic growth locations

- **Abergavenny and Llanfoist:**
  - Option A: Land north of Abergavenny.
  - Option B: Land to the east of the A465; and
  - Option C: Land between the B4246 and Heads of the Valleys Road.
- **Chepstow:**
  - Option D: Land north of the Bayfield Estate.
  - Option E: Land between the Bayfield Estate and A48; and
  - Option F: Land between the A48 and M48.
- **Monmouth:**
  - Option G: Land west of Monmouth.
  - Option H: Land in central Monmouth; and
  - Option I: Land north-east of Monmouth.
- **Severnside:**
  - Option J: Land north-east of Caldicot.
  - Option K: Land north-west of Caldicot.
  - Option L: Land west of Caldicot/ east of Rogiet; and
  - Option M: Land east of Caerwent.

## 6. Assessing Reasonable Alternatives

### 6.1 Introduction

6.1.1 This chapter presents the summary findings of the assessment of reasonable alternatives set out in Chapter 5. Sets of options have been considered for the following:

- Level of growth.
- Location of growth; and
- Strategic growth area options.

6.1.2 Detailed assessment findings are provided in the following appendices:

- Appendix B: Level of growth options.
- Appendix C: Location of growth options; and
- Appendix D: Strategic growth area options.

### 6.2 Methodology

6.2.1 The strategic options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in Appendices B - D.

6.2.2 For each of the strategic options, the assessment has examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see Table 3.1) as a methodological framework.

6.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.2.4 It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (i.e., where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of Monmouthshire County Council).

6.2.5 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to

distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2 or 3 or so on.

## 6.3 Summary assessment findings for level of growth options

6.3.1 The three options for the level of growth are:

- **Option 1:** Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2:** Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3:** WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

6.3.2 A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix B.

**Table 6.1: Summary findings for level of growth options**

<b>ISA theme</b>	<b>Rank/ significant effects</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>
<b>Economy and employment</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>
<b>Population and communities</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>
<b>Health and wellbeing</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>
<b>Equalities, diversity, and social inclusion</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>
<b>Transport and movement</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Natural resources (air, land, minerals, and water)</b>	<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Biodiversity and geodiversity</b>	<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Historic environment</b>	<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

<b>ISA theme</b>	<b>Rank/ significant effects</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>
<b>Landscape</b>	<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Climate change (including flood risk)</b>	<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

- 6.3.3 For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors in these areas, and the potential mitigation measures available. The lowest growth option (Option 3) is ultimately ranked most favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development proposed through Option 1, followed by Option 2, have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.
- 6.3.4 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment (in the absence of known development locations). 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. The significance of the effects is likely to increase as the level of growth increases. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.
- 6.3.5 Similarly, for the transport ISA theme, Options 1 and 2 proposing a higher level of growth are more likely to result in impacts on the local road network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking because of the pandemic is considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, 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, the importance of which have all been highlighted during the pandemic. As a result, higher growth Option 1, followed by Option 2, are ranked more favourably than Option 3 overall.
- 6.3.6 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.

6.3.7 High 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. Option 2 performs slightly less positively than Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this Option, providing a more balanced demographic and more sustainable communities than predicted under Option 3.

## 6.4 Summary assessment findings for location of growth options

6.4.1 The four options for the location of growth are:

- **Option 1:** Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2:** Proportionately distributed growth – growth would be distributed across the County’s most sustainable settlements with the level of growth proportionate to that settlement’s size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3:** Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4:** Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.

6.4.2 A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix C.

**Table 6.2: Summary findings for location of growth options**

<b>ISA theme</b>	<b>Rank/ significant effects</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>
<b>Economy and employment</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Population and communities</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Health and wellbeing</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Equalities, diversity, and social inclusion</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Transport and movement</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>3</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Natural resources (air, land, minerals, and water)</b>	<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>



<b>ISA theme</b>	<b>Rank/ significant effects</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>
	<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>
<b>Biodiversity and geodiversity</b>	<b>Rank</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Yes – Negative</b>	<b>Yes - Negative</b>	<b>Uncertain</b>	<b>Yes - Negative</b>
<b>Historic environment</b>	<b>Rank</b>	<b>=</b>	<b>=</b>	<b>=</b>	<b>=</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Landscape</b>	<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Climate change (including flood risk)</b>	<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>
	<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

- 6.4.3 The appraisal found that there is little to differentiate between the options at this stage regarding the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints, albeit in different areas of the County. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects environmental 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.
- 6.4.4 Similar conclusions can also be drawn in relation to biodiversity given the presence of international, national, and local designations throughout the County, though options can be differentiated between in relation to nutrient neutrality implications on the River Wye and River Usk SACs. Whilst solutions are available the options are ranked according to the mitigation requirements. Options 1 and 2, which direct growth to these Primary Settlements (followed by Option 4), therefore are worst performing overall.
- 6.4.5 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and near landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known, and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have uncertain effects in relation to the landscape and climate change themes.
- 6.4.6 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately most growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.
- 6.4.7 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment, and facilities/ services. The importance of high levels of local accessibility to open space, services and

facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.

- 6.4.8 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, limited growth to the rest of the County under Option 3 and Option 4 would restrict economic growth in the wider County, and would not assist in sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out-commuting.
- 6.4.9 Consideration is also given throughout the appraisal to Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt "*around Newport and eastern parts of the region*". This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire's main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of a Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

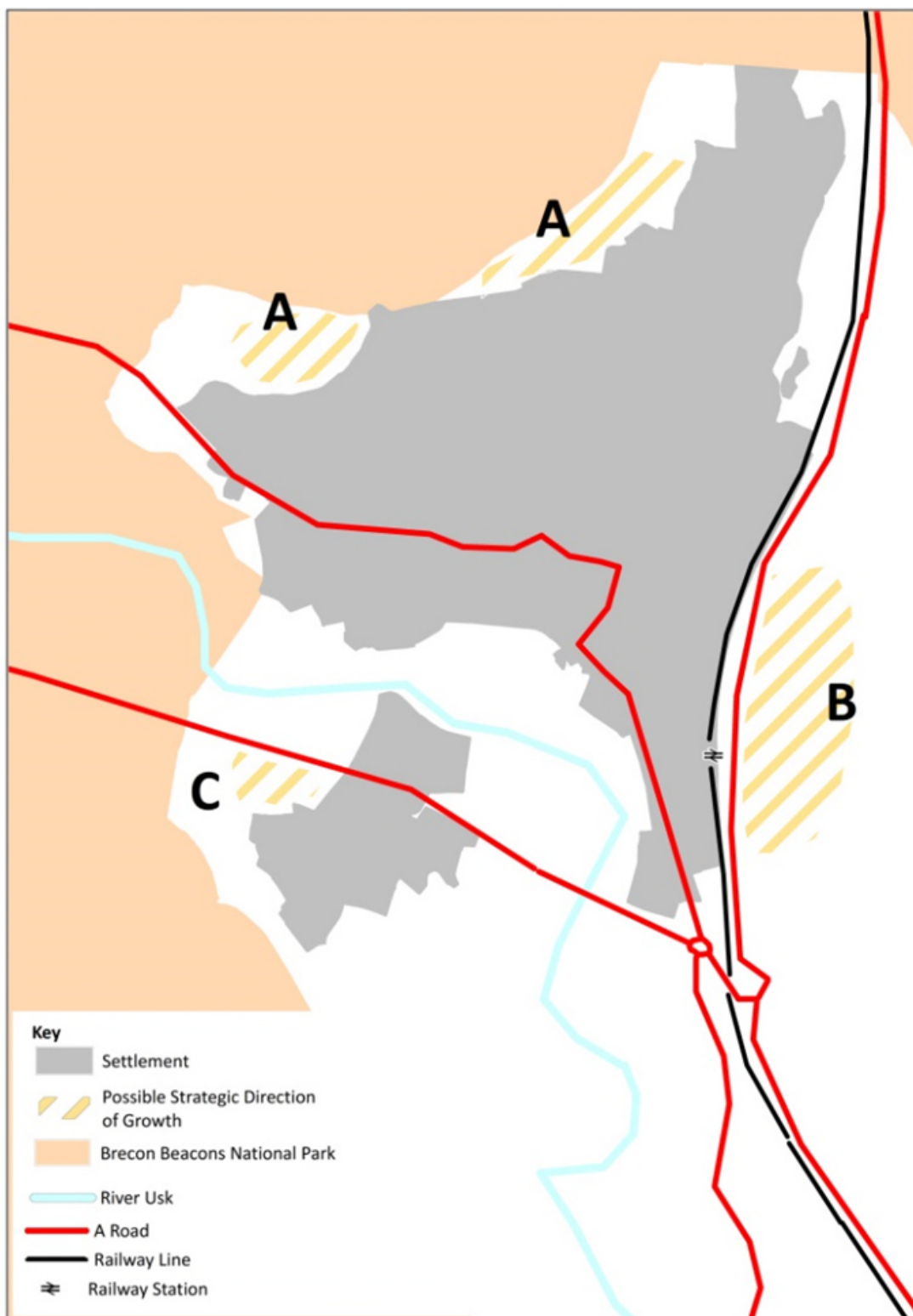
## 6.5 Summary appraisal findings for strategic growth area options

- 6.5.1 Strategic growth options have been identified across the four settlement areas of Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside. A summary of the assessment of these options is provided below with the detailed assessment findings presented in Appendix D.

### 6.5.2 Abergavenny and Llanfoist:

- Option A: Land north of Abergavenny.
- Option B: Land to the east of the A465; and
- Option C: Land between the B4246 and Heads of the Valleys Road.

**Figure 6-1: Strategic growth options in Abergavenny and Llanfoist**



**Table 6.3: Summary findings for Abergavenny and Llanfoist strategic growth options**

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Economy and employment	Rank	1	2	3
	Significant effect?	No	No	No
Population and communities	Rank	1	2	3
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	2	2
	Significant effect?	No	No	No
Equalities, diversity, and social inclusion	Rank	2	3	1
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic environment	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	3	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain

ISA theme	Rank/ Significant effects	Option A	Option B	Option C
Climate change (including flood risk)	Rank	2	1	3
	Significant effect?	Uncertain	Uncertain	Uncertain

- 6.5.3 No significant differences have been identified between Options for the Transport and Movement ISA theme.
- 6.5.4 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However, Option C performs most positively against the Equalities, diversity, and social inclusion ISA theme as this Option best supports deprived communities to the west of the town.
- 6.5.5 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.
- 6.5.6 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Whilst solutions are now available, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level, and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.
- 6.5.7 Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the Brecon Beacons National Park, its open character and hillside setting. Option A is also worst performing

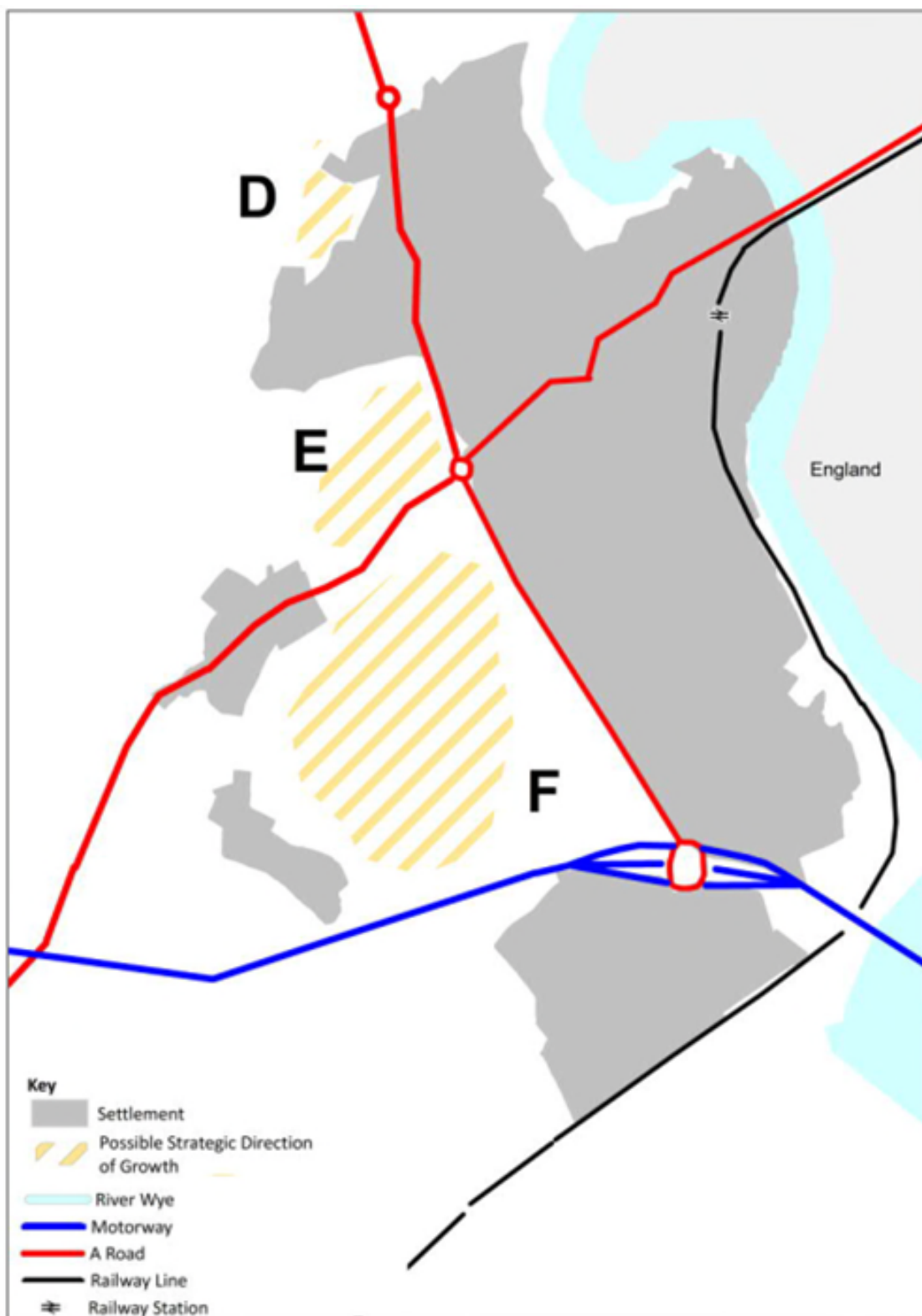
given its 'high/medium' sensitivity to residential development, as set out in the Monmouthshire Landscape Sensitivity Update Study (2020). Option B is also identified as having 'high/medium' sensitivity to residential development.

- 6.5.8 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the issue of nutrient neutrality in the River Usk SAC, all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 6.5.9 Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within areas at higher risk of flooding, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.10 **Chepstow:**

- Option D: Land north of the Bayfield Estate.
- Option E: Land between the Bayfield Estate and A48; and
- Option F: Land between the A48 and M48.

**Figure 6-2: Strategic growth options in Chepstow**





**Table 6.4: Summary findings for Chepstow strategic growth options**

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Economy and employment	Rank	3	2	1
	Significant effect?	No	No	No
Population and communities	Rank	=	=	=
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	=	=	=
	Significant effect?	No	No	No
Equalities, diversity, and social inclusion	Rank	2	1	3
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	=	=	=
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Historic environment	Rank	1	1	2
	Significant effect?	Uncertain	Uncertain	Yes - Negative
Landscape	Rank	2	1	3
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative

ISA theme	Rank/ Significant effects	Option D	Option E	Option F
Climate change (including flood risk)	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

- 6.5.11 No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.
- 6.5.12 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.
- 6.5.13 All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.
- 6.5.14 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, impacts upon which have the potential for long term negative effects.
- 6.5.15 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.
- 6.5.16 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity

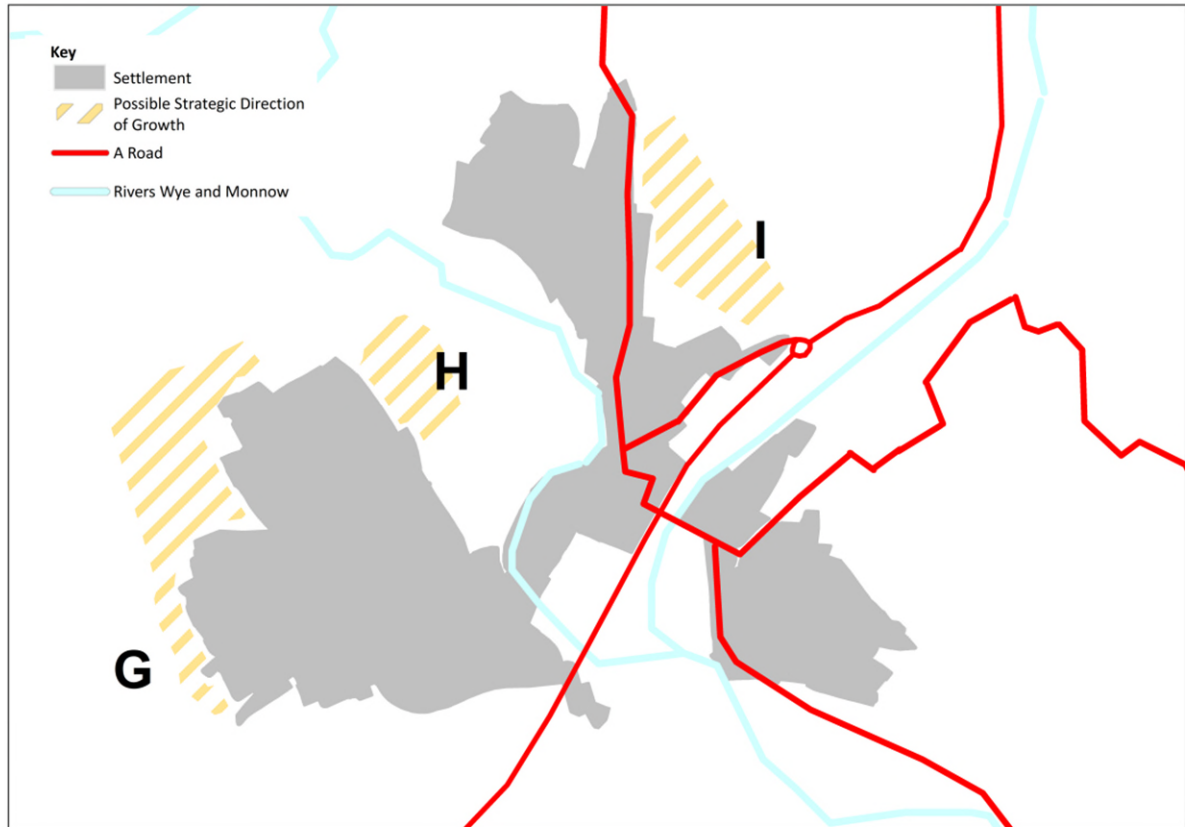
Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.

- 6.5.17 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.18 **Monmouth:**

- Option G: Land west of Monmouth.
- Option H: Land in central Monmouth; and
- Option I: Land north-east of Monmouth.

**Figure 6-3: Strategic growth options in Monmouth**



**Table 6.5: Summary findings for Monmouth strategic growth options**

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Economy and employment	Rank	2	1	3
	Significant effect?	No	No	No
Population and communities	Rank	2	1	1
	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	1	1	1
	Significant effect?	No	No	No

ISA theme	Rank/ Significant effects	Option G	Option H	Option I
Equalities, diversity, and social inclusion	Rank	=	=	=
	Significant effect?	No	No	No
Transport and movement	Rank	=	=	=
	Significant effect?	No	No	No
Natural resources	Rank	1	2	3
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	1	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Historic environment	Rank	1	2	3
	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
	Significant effect?	Uncertain	Yes - Negative	Yes - Negative
Climate change (including flood risk)	Rank	=	=	=
	Significant effect?	Uncertain	Uncertain	Uncertain

6.5.19 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.

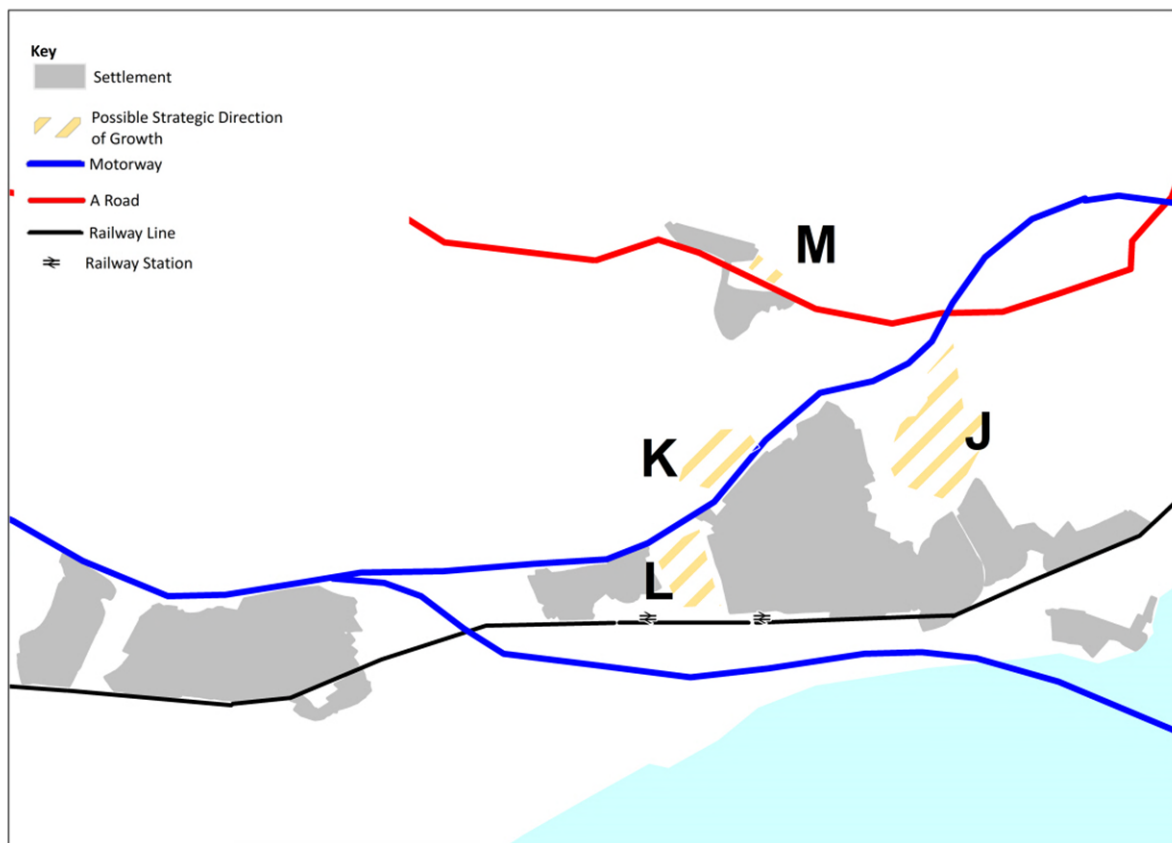
6.5.20 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is

- most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.
- 6.5.21 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.
- 6.5.22 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Whilst solutions are now available to address nutrient neutrality issues, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.
- 6.5.23 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).
- 6.5.24 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance).
- 6.5.25 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 6.5.26 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

6.5.27 **Severnside:**

- Option J: Land north-east of Caldicot.
- Option K: Land north-west of Caldicot.
- Option L: Land west of Caldicot/ east of Rogiet; and
- Option M: Land east of Caerwent.

**Figure 6-4: Strategic growth options in Severnside**



**Table 6.6: Summary findings for Severnside strategic growth options**

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
<b>Economy and employment</b>	<b>Rank</b>	2	2	1	3
	<b>Significant effect?</b>	No	No	No	No
<b>Population and communities</b>	<b>Rank</b>	1	2	1	3
	<b>Significant effect?</b>	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
<b>Health and wellbeing</b>	<b>Rank</b>	2	2	1	3

ISA theme	Rank/ Significant effects	Option J	Option K	Option L	Option M
	Significant effect?	No	No	No	No
Equalities, diversity, and social inclusion	Rank	2	3	1	4
	Significant effect?	No	No	No	No
Transport and movement	Rank	2	2	1	3
	Significant effect?	No	No	No	No
Natural resources	Rank	2	2	1	2
	Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Biodiversity and geodiversity	Rank	3	2	3	1
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
Historic environment	Rank	3	2	1	2
	Significant effect?	Uncertain	Uncertain	No	Uncertain
Landscape	Rank	3	3	2	1
	Significant effect?	Yes - Negative	Yes - Negative	Uncertain	Uncertain
Climate change (including flood risk)	Rank	1	1	3	2
	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

6.5.28 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network.



Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres, services and facilities, and relatively limited potential to capitalise upon the strategic road network.

- 6.5.29 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.
- 6.5.30 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.
- 6.5.31 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.
- 6.5.32 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having 'medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated 'Green Wedge'. Option M is best

performing in this respect, although there remains the potential for residual minor negative effects.

- 6.5.33 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered, i.e., through biodiversity net-gain, and the enhancement of designated assets.
- 6.5.34 Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

## 7. Developing the Preferred Approach

### 7.1 Preferred growth and spatial option

- 7.1.1 The Council have provided the following response to the alternatives assessment.
- 7.1.2 The options appraisal concluded that Growth Option 2 and Spatial Option 2 combined were the most appropriate options for the 2022 Preferred Strategy and Deposit Plan.
- 7.1.3 While Growth Option 2 reduces the level of growth proposed compared to the 2021 Preferred Strategy it is considered the best option to respond to challenges, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing at pace and scale, 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. Similarly, Spatial Option 2 would address our locally evidence-based issues and objectives 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.
- 7.1.4 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions<sup>13</sup>. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing our demography by ensuring that young people can choose to live in the County while responding to the climate and nature emergency. The ISA analysis identifies 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 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 suggesting the level of growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys and as a result would not be in general conformity with policies 1 and 33 of Future Wales: the National Plan 2040.

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<sup>13</sup> 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.

Growth Option 1 has therefore been discounted. Further to this, Growth Option 3 performs negatively to 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 social inclusion. Option 3 would not deliver on the Council's core objectives of delivery of affordable housing and rebalancing our demography and has subsequently been rejected. For further details on Growth Options 1 and 3 refer to the Growth and Spatial Strategy Options Appraisal as set out in Appendix 1.

7.1.5 Spatial Option 2 and Spatial Option 1 perform positively against ISA themes, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The Preferred Growth and Spatial Option 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, 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 net zero carbon, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements. 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 Economy, Employment and Skills Strategy 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.

7.1.6 Overall, it is considered that the Deposit Plan, 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 2021 and the Welsh Government's response which objected to the level of growth proposed. In response, the Deposit Plan proposes a lower level of growth that responds to these challenges.

## 7.2 Preferred strategic sites

- 7.2.1 The Preferred Strategic Site Allocations have been selected from a total of 13 Strategic Growth Options located across Abergavenny, Chepstow, Monmouth and Severnside that were previously consulted on in the 2021 and 2022 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received.
- 7.2.2 As part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'. Although it was made clear at that time that this was not part of the formal consultation, the results provide a helpful indication of public opinion. A total of 3,179 preferences were cast in the process. Table 7.1 below provides further detail. The four Preferred Strategic Site Allocations identified in the Deposit Plan are highlighted.

**Table 7.1: Strategic site options**

SEA option	Strategic growth area	Up votes	Down votes
Abergavenny A	Land north of Abergavenny	54	184
<b>Abergavenny B</b>	<b>Land to the east of the A465</b>	<b>191</b>	<b>23</b>
Abergavenny C	Land between the B4246	107	47
Chepstow D	Land north of the Bayfield Estate	51	132
<b>Chepstow E</b>	<b>Land between the Bayfield Estate and A48</b>	<b>43</b>	<b>143</b>
Chepstow F*	Land between the A48 and M48	60	143
Monmouth G	Land west of Monmouth	270	175
Monmouth H	Land central Monmouth	255	189
<b>Monmouth I</b>	<b>Land north east Monmouth</b>	<b>318</b>	<b>248</b>
<b>Severnside J</b>	<b>Land north east of Caldicot</b>	<b>74</b>	<b>72</b>
Severnside K	Land north west of Caldicot	48	85
Severnside L	Land west of Caldicot/ east of Rogiet	57	100
Severnside M	Land east of Caerwent	59	51

\*Site/ Option F is no longer being put forward for development by the site promoter

- 7.2.3 The reasons for selection of sites are set out below:

### Land to the East of Abergavenny (Option B)

- 7.2.4 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use development, containing a mix of residential uses alongside employment/commercial uses, facilities and services.
- 7.2.5 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre

(0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.

- 7.2.6 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW12 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.
- 7.2.7 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

#### **Land at Mounon Road, Chepstow (Option E)**

- 7.2.8 The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounon Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits.
- 7.2.9 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the existing built-up area west of the A466 (St Lawrence Road), north of the A48 and south of Mounon Road. The site is near the Wye Valley National Landscape (AONB) and on the opposite side of the road to the Mathern Conservation Area. PPW gives National Parks and AONBs equal status in terms of landscape and scenic beauty and requires that both be afforded the highest status of protection from inappropriate developments. Development in this location would need to be carefully designed to ensure that any effects on the setting of the National Landscape are acceptable. The land is categorised as being of high/medium landscape sensitivity to residential development.
- 7.2.10 The site is approximately 0.9 miles or an approximate 15-minute walking distance from the town centre and Bulwark neighbourhood centre, 0.9 miles (approximately 17-minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 9-minute walk) from Chepstow railway station. As outlined above, careful consideration will be required regarding the cumulative impact of development on the A466, A48 and Highbeech roundabout.
- 7.2.11 Circa 72% of the land is predictive grade 2 and 3a BMV agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. Moreover, the County's primary settlements

are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Another consideration will include its location in the limestone minerals safeguarding area.

### **Leasbrook, Monmouth (Option I)**

- 7.2.12 The preferred strategic site allocation in Monmouth relates to a greenfield site to the north-east of Monmouth. The site is a sustainably located edge of settlement site north of Dixton Road. The site is located adjacent to existing development at Dixton Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west, along with agricultural land to the east and north.
- 7.2.13 Monmouth sits within the River Wye Special Area of Conservation (SAC) catchment area. The strategic site will therefore need to demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution to phosphates at the Monmouth Wastewater Treatment Works has been identified by Dŵr Cymru Welsh Water which should be implemented by 31<sup>st</sup> March 2025.
- 7.2.14 The site is near the Dixton Roundabout offering good links to locations further afield when public transport and use of the private car is necessary. There is no rail network to encourage sustainable travel by rail, the need to reduce travel/carbon and support active travel options is of importance.
- 7.2.15 Regarding agricultural land, the site contains a small amount of Grade 2 land with most of the site Grade 3a with Grade 3b. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Monmouth is of BMV status. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.
- 7.2.16 As a small part of the main access point of the site is located in floodplain, an emergency access will be included to ensure an alternative route in any extreme flooding events on Dixton Road. The site is located within proximity to two Special Areas of Conservation and adjoins the Dixton Conservation Area with a very small portion of the site being located in the Lower Wye Valley Landscape of Historic Interest.
- 7.2.17 In terms of distance to Monmouth Town Centre the site is located approximately 0.6 miles/13-minutes from the Town Centre with the whole Town Centre being located within 0.9 miles and an 18-minute walk. The site is in very close proximity to Monmouth Comprehensive School 0.4miles/ 7-minutes and the Leisure Centre 0.6miles/ 12-minutes (using the public entrance/route).

### **Land to the East of Caldicot (Option J)**

- 7.2.18 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and adjacent to the adopted LDP Crick Road, Portskewett site. The site is north of the Caldicot Castle

Country Park, a Conservation Area and an area currently designated as an Area of Amenity Importance under the Adopted LDP.

- 7.2.19 A small part of the candidate site adjacent to the former railway line is in the floodplain: built development would not be permitted within this part of the site. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being on Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.
- 7.2.20 In terms of agricultural land, the site contains a small area of grade 1 agricultural land, most of which is within a floodplain so would not be built on. The remaining area is classified predominantly as grade 2 agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.
- 7.2.21 In terms of distance from Caldicot town centre, it is approximately 1.2 miles (from a central point of the growth area) and approximately 22-minutes walking distance. It is approximately a 33-minute walk from Caldicot railway station. The former railway line has recently been purchased by MCC and is being turned into an active travel route, offering a significant benefit in terms of modal shift and leisure provision. Landscape sensitivity to residential development is high/ medium. Part of this site is within the limestone minerals safeguarding area.
- 7.2.22 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.



## 8. ISA Findings of the Deposit Plan at this Stage

### 8.1 Introduction

8.1.1 The aim of this chapter is to present an appraisal of the RLDP, as currently presented in the Deposit Plan.

### 8.2 Methodology

8.2.1 The appraisal of the Deposit Plan identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see Table 3.1) as a methodological framework.

8.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.

8.2.3 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.<sup>14</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

### 8.3 Overview of the Deposit Plan

8.3.1 Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) set the spatial strategy for housing and employment growth in Monmouthshire during the plan period. To implement the RLDP's Strategy, strategic site allocations are identified within Policies HA1 to HA4 for the primary settlements of Abergavenny, Caldicot, Chepstow, and Monmouth. Each of the strategic site allocations has been subject to ISA, as detailed in Chapter 6 and Appendix D, and the findings of this work has informed this appraisal.

8.3.2 Policy S1 states that the RLDP will make provision for 6,210 homes (to meet a housing requirement of 5,400 homes, including a 15% flexibility allowance), and a minimum of 38 hectares of employment land over the plan

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<sup>14</sup> Environmental Assessment of Plans and Programmes Regulations 2004

period 2018-2033. As set out in Policy S2, the focus of this development will be to the County's most sustainable settlements of Abergavenny, Caldicot, Chepstow, and Monmouth, including Severnside, as well as some growth in the most sustainable rural settlements to deliver much needed affordable homes, and to address rural inequality and rural isolation in these areas.

8.3.3 Policy S2 sets out the indicative proportion of residential growth to be accommodated by each of the settlement tiers. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal<sup>15</sup>, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Table 8.1 out a summary of the overarching indicative spatial distribution of housing provision for the RLDP.

**Table 8.1: Summary of indicative spatial distribution of housing provision**

Settlement	Completions 2018-2023	Existing Commitments	Total Allowances (Small sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocations (Dwellings)	Total RLDP Housing Provision
Abergavenny (incl. Llanfoist)	537	29	196	0	600	1,362
Chepstow	448	81	154	0	146	829
Monmouth (incl. Wyesham)	286	70	77	160	330	923
Caldicot (incl. Severnside)	663	555	162	0	805	2,190
Secondary Settlements	109	38	67	0	136	350
Rural Settlements	177	25	231	15	113	556
<b>Total</b>	<b>2,220</b>	<b>798</b>	<b>887</b>	<b>175</b>	<b>2,130</b>	<b>6,210</b>

8.3.4 Policy S2 also outlines the distribution of employment growth, as shown in Table 8.2.

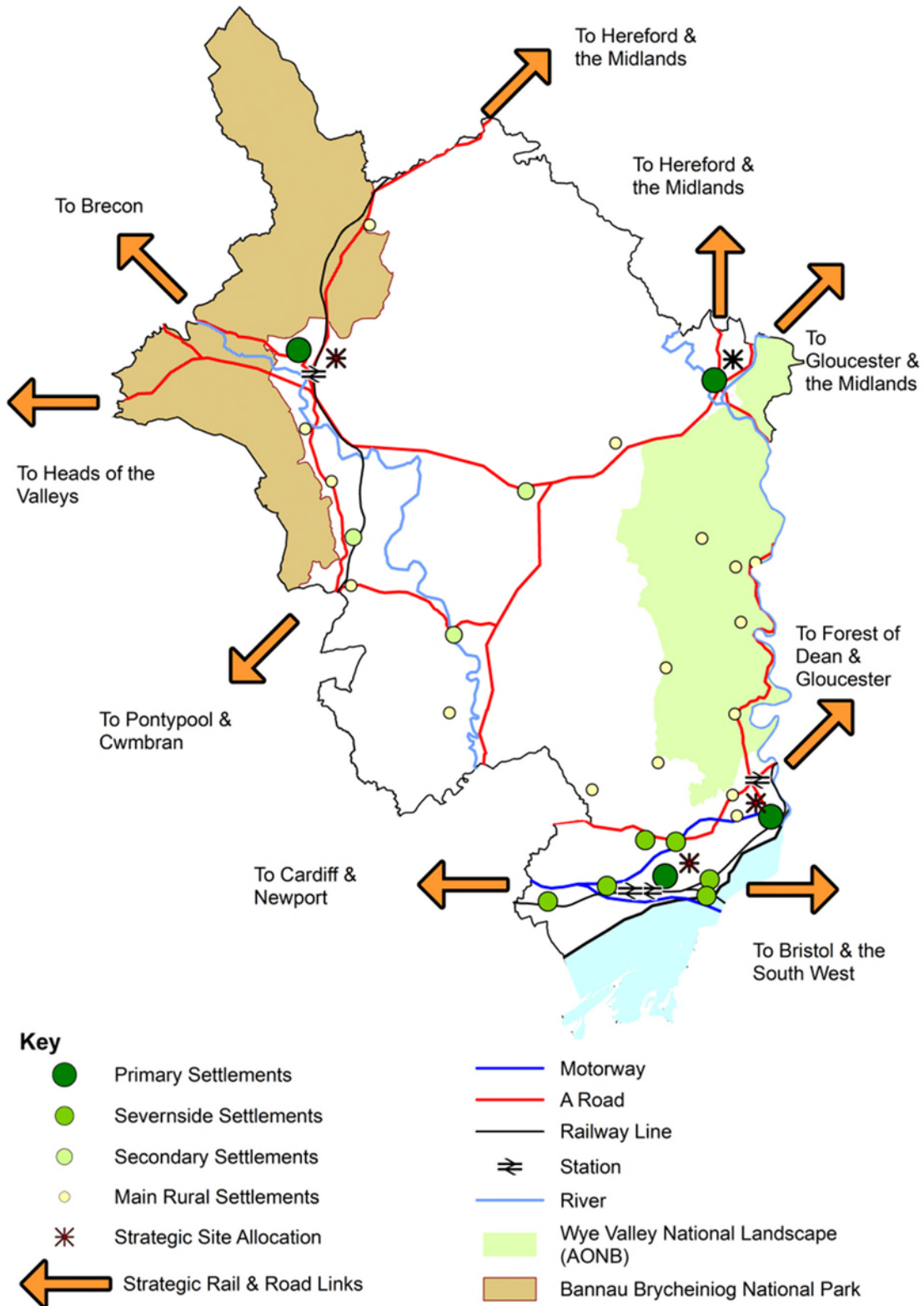
<sup>15</sup> The Sustainable Settlement Appraisal 2020 can be viewed on the Council's website via the following link: <https://democracy.monmouthshire.gov.uk/documents/s26562/Appendix%201%20Sustainable%20Settlement%20Appraisal%20March%202020.pdf>

**Table 8.2: Distribution of employment land**

<b>Settlement</b>	<b>% of employment growth distribution</b>	<b>Hectares</b>
Abergavenny (incl. Llanfoist)	3	1.7 (note: The Council will continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the CCR / relevant partners)
Chepstow	11	6.4
Monmouth (incl. Wyesham)	10	5.84
Caldicot (incl. Severnside area comprising of: Caerwent, Crick, Magor, Undy, Portskewett, Rogiet and Sudbrook)	65	37.86
Secondary settlements of Penperlleni, Raglan and Usk	10	6.05

8.3.5 The RLDP key diagram is provided in Figure 8.1.

**Figure 8.1: RLDP Key Diagram**



## 8.4 Economy and employment

- 8.4.1 Strategic Policy S1 (Growth Strategy) states that the RLDP will make provision for 6,210 homes (to meet a housing requirement of 5,400 homes) and a minimum of 38 hectares of employment land over the Plan period 2018-2033. The proposed distribution of these homes is set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) and shown in Table 8.1. The proposed distribution of employment land is also set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) and shown in Table 8.2. New and protected employment areas are also included under Policy EA1 (Employment Allocations) and Policy EA2 (Protected Employment Sites).
- 8.4.2 The spatial strategy performs positively in relation to the ISA objective to maximise the economic contribution of the area to the Cardiff City, Bristol, and wider South West Region, particularly in respect of directing strategic allocations for housing growth to locations from which key regional employment hubs can be accessed. Abergavenny (including Llanfoist) and Chepstow each have existing rail connections to both Newport and Cardiff, with services to Cardiff taking around 40-45 minutes from Abergavenny and around 40 minutes from Chepstow. Within the Severnside area, Caldicot has been classified as a higher tier settlement, with functional transport links to the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Caldicot Train Station connects the town to the employment areas of Newport, Cardiff, and Bristol. Whilst Monmouth does not have a train station, it allows for sustainable transport access via bus services to locations like Abergavenny and Hereford and is also adjacent to the A40. This road provides vehicular connections to the wider strategic network – Newport is an approximate 30-minute drive to the south-west.
- 8.4.3 Directing growth to these locations responds positively to the removal of the Severn Bridge Tolls; a multi-modal transport network with services fulfilled by a combination of heavy rail, light rail and bus rapid transit. Higher growth in this part of the County will capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County located between the ‘Great Western Cities’. Furthermore, directing growth close to the M4/ M48 will provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County.
- 8.4.4 It is considered likely that sustainable travel upgrades will be seen across the Primary Settlements, including an increase in the capacity of travel modes, increased frequency of services to Newport and Cardiff, and reduced journey times. This will enable workers to access key employment centres and jobs markets more quickly and more frequently, boosting the local and regional economy. Furthermore, Policy H1 (Residential Development in Primary and Secondary Settlements), Policy H2 (Residential Development in Main Rural Settlements) and Policy H3 (Residential Development in Minor Rural Settlements) all work to safeguard existing retail and employment space through new-build residential development and the redevelopment/ conversion of existing structures. Furthermore, Policies RC1 (Central Shopping and Commercial Areas), RC2 (Primary Shopping Frontages), RC3 (Local Centres and Neighbourhood Centres / Shops) and RC4 (New Retail

Proposals Outside of Identified Town and Local Centres) contribute to protecting existing and bringing forward further retail opportunities, thus working towards maintaining and enhancing the local economy.

- 8.4.5 Distributing housing and employment growth between Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside) and Monmouth (including Wyesham) will help ensure growth is dispersed across the plan area and not simply concentrated towards the M4 corridor in the south. For example, despite being accessible to Cardiff, Abergavenny is sufficiently far north that it serves as the regional centre for a number of smaller settlements in the north of the plan area. By delivering substantial growth at Abergavenny, including through the strategic site Land to the East of Abergavenny (Policy HA1 – for 500 homes over the plan period) and through Policy HA5 (Land at Penlanlas, Abergavenny – for 100 homes over the plan period), the spatial strategy will help sustain the rural economy of the smaller settlements which Abergavenny supports. It is noted that the strategic allocation under Policy HA1 (Land to the East of Abergavenny) will deliver a residential-led mixed-use development, including a mixed-use hub, and park and ride services. This will contribute to enhancing access to employment opportunities and services that support the local economy by bringing forward new/ additional opportunities within Abergavenny itself and improving connections to the transport network.
- 8.4.6 By also distributing a substantial proportion of growth to the Severnside settlements, the spatial strategy is likely to deliver further positive effects in relation to the economy and employment. The Severnside settlements (Caldicot, Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) are strategically located for access to the M4/ M48 corridors and to rail services between Cardiff and Bristol. The area is already well served by public transport via Caldicot and Severn Tunnel Junction stations and, as with other Tier 1 settlements, public transport connectivity is likely to be enhanced later in the plan period as the rollout of the SE Wales Metro progresses. Given the scale of growth proposed at Caldicot under Policy HA2 (Land to the East of Caldicot – for 770 homes over the plan period), it is considered that improvements to the sustainable/ active travel network would likely be delivered alongside housing and employment. This includes stipulations made under Policy HA2 (Land to the East of Caldicot) for pedestrian and cycle links within and to the new development area, including from Caldicot Town Centre and the former MoD railway, cycle, and walking routes.
- 8.4.7 The strategic site allocation under Policy HA2 (Land to the East of Caldicot) will also deliver residential-led mixed-use development, including a local centre with appropriate community facilities, and employment space. As such, it is considered the strategic site will make a considerable economic contribution to the Cardiff City Region, as locating housing and employment growth in close proximity to regional economic opportunities has the potential to lead to significant long term positive effects. It is also noted that Policy HA9 (Land at Former MOD land, Caerwent, for 40 homes over the plan period) is put forward for a mixed-use residential scheme, including employment land.

- 8.4.8 The Severnside settlement cluster already represents a key employment hub in its own right and delivering housing growth will help ensure the continued vitality of key employment sites such as Castle Gate Business Park at Caldicot and the AB InBev brewery at Magor. However, strategic housing growth at the south of the County is likely to also prove an attractive location for workers who commute to employment hubs outside the Cardiff City Region, particularly those who commute to Bristol which is a short drive or train journey away.
- 8.4.9 The strategic site allocation in Chepstow under Policy HA3 (Land at Mounton Road, Chepstow, for 146 homes over the plan period) is proposed for residential use and commercial uses, for example, hotels or residential care homes. Whilst this is unlikely to encourage a large level of inward investment and support local economic growth directly, delivering growth in this location will increase the local workforce and support tourism. As such, development of the site will contribute towards the local/ wider economy, with potential for long-term positive effects.
- 8.4.10 The Preferred Strategy (December 2022) proposed no new site allocations in the primary settlement of Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge, due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth Wastewater Treatment Works (WwTW) within the Plan period. However, new site allocations have been considered in Monmouth (including Wyesham) on the basis that sufficient certainty is provided by Dwr Cymru Welsh Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31<sup>st</sup> March 2025. As such, development in the area will help to address concerns in Monmouth over a reduced working age population.
- 8.4.11 One strategic allocation is made within Monmouth under Policy HA4 (Land at Leasbrook, for 270 homes over the plan period), and three further sites are proposed under Policy HA6 (Land at Rockfield for 60 homes over the plan period), Policy HA7 (Land at Drewen Farm for 110 homes over the plan period), and Policy HA8 (Tudor Road, Wyesham for 50 homes over the plan period). Whilst these policies focus only on residential development, they are anticipated to bring forward positive effects in relation to this ISA theme by increasing the working age population in the area and bringing forward additional spending within the local economy.
- 8.4.12 The additional housing development sites under policies HA10 to HA18 also have a residential focus. Whilst these policies do not make provision for employment land, it is considered that they will bring forward positive effects through locating housing in proximity to economic opportunities in the area.
- 8.4.13 Strategic Policy S10 (Employment Sites Provision) sets out the quantum of employment land to be delivered throughout the Plan period, in accordance with the Spatial Strategy and the recommendations of the Employment Land Review (ELR) (2022). This is supported by Policy E1 (Protection of Existing Employment Land) and Policy E2 (Non-Allocated Employment Sites), which seek to maintain and enhance employment levels by safeguarding existing sites and supporting new sites for industrial and business development.
- 8.4.14 In line with Strategic Policy S10, provision will be made for a minimum of 57 hectares of land on a suitable range and choice of sites for industrial and



business development (classes B1, B2 and B8). This minimum requirement reflects a forecast scenario based on past take-up rates and includes a five-year buffer to allow for choice and uncertainty in forecasting. Strategic Policy S10 also seeks to protect existing employment land from conversion to “*alternative forms of development*”. When considering the existing employment land supply, it is recognised that the large existing employment allocation at Quay Point, Magor, accounts for a significant mass of land of the available supply of employment land at one site (13.76ha). The Deposit Plan highlights the need for further supply to meet the shortfall of supply and enable further flexibility in the market in terms of types of land and locations.

- 8.4.15 The other strategic policies likely to have a direct effect in relation to economy and employment are Strategic Policy S11 (Rural Economy) and Strategic Policy S12 (Visitor Economy), given that they seek to support the diversification of the rural economy and support the visitor economy and promote sustainable forms of tourism. This is supported by Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside), and Policy T2 (Protection of existing tourism facilities). Future Wales (2021) has expressed a commitment to supporting vibrant rural areas and improving the rural economy<sup>16</sup>. The National Plan Policy 4 – Supporting Rural Communities, and Policy 5 – Supporting the Rural Economy, establish the national policy approach for LDPs to plan positively to meet the employment needs of rural areas through appropriate and proportionate economic growth. Strategic Policy S11 (Rural Economy) therefore seeks to sustain and enhance the economy of the County’s rural settlements to ensure their continued viability, which is likely to have a long term positive effect on this theme. This is achieved through the supporting policies RE1 (Secondary and Main Rural Settlements Employment Exceptions), RE2 (The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use), RE3 (Agricultural Diversification), RE4 (New Agricultural and Forestry Buildings), RE5 (Intensive Livestock/ Free Range Poultry Units), and RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside).
- 8.4.16 The role of the rural economy is considered through Strategic Policy S12, which recognises the significance of tourism to Monmouthshire’s economy, with the supporting text of the policy stating that “*in rural areas tourism related development is an essential element in providing for a healthy diverse local economy*”. By establishing support in principle for development which provides or enhances sustainable tourism Policy S12 will help support and grow the tourism sector which has the additional benefit of distributing employment opportunities throughout small settlements and rural areas of the County. Collectively, this suite of policies is considered to perform positively in relation to the ISA objectives of contributing to the local economy, strengthening, and diversifying the economy, and ensuring a distribution of employment opportunities throughout the plan area.
- 8.4.17 PPW12 equally values the importance of tourism to economic prosperity and job creation and its ability to act as a catalyst for environmental protection, regeneration, and improvement in both urban and rural areas. Strategic Policy S14 (Town, Local and Neighbourhood Centres) establishes a four-tier retail hierarchy, with the broad retail offer of the four ‘County towns’ of

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<sup>16</sup> Welsh Government (2020) Future Wales: the national plan 2040 [online] available at: <https://gov.wales/future-wales-national-plan-2040#FutureWales:TheNationalPlan2040>



Abergavenny, Caldicot, Chepstow and Monmouth recognised as being of significance not just to the towns themselves but also their wider rural hinterlands. The ‘Minor County Town Centres’ of Usk and Magor are located on the second tier, and the ‘Local Centres’ of Raglan and Bulwark are in the third tier. These centres are recognised as serving a more local convenience function, whilst the fourth tier applies to neighbourhood centres within larger settlements. Linked to this, Strategic Policy S6 (Infrastructure) seeks to secure improvements in infrastructure, facilities, services and related works across the four-tier retail hierarchy. This includes health infrastructure and facilities, and recreation and leisure facilities which will likely provide local employment opportunities.

- 8.4.18 Welsh Government’s commitment to better places, placemaking, quality outcomes, and good design is evidenced throughout the Building Better Places (2020) Document, which identifies town centres as a policy area that should be the focus of consideration and action, in order to act as a catalyst for a recovery. The RLDP policy intention is therefore to protect town and local centre vitality and sustain the County’s main settlements as “*vibrant and attractive centres*” to ensure that they “*remain attractive places to live and visit*”. This is considered to perform positively in relation to the ISA objective to enhance the viability and vitality of town centres.
- 8.4.19 In terms of supporting the rural economy and tourist economy, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Conservation) could have potential for indirect positive effects by protecting natural and built heritage attractions and thereby encouraging tourism development and tourist spend. For example, Strategic Policy S5 seeks the protection of landscape and townscape character to protect and enhance “*landscape setting and quality of place*”, and also highlights the importance of resilient ecosystems.
- 8.4.20 Whilst highlighted as a key issue for the RLDP, the policies are largely silent on skills and training. Skills and training are important considerations in terms of aligning the RLDP with current and emerging economic opportunities at both a local and regional scale, i.e., the City Deal and the Skills for the Future Project. As discussed above, the RLDP sets out support for inward investment and local employment growth/ opportunities; however, it could be further strengthened by establishing a policy position on delivering high quality skills and training.

## Cumulative effects

- 8.4.21 Cumulatively, Monmouthshire’s location within the ten-authority Cardiff City Region gives it a broad regional context, and its location at the eastern edge of the region means it is also within the influence of economic hubs in England, particularly the Bristol City Region and local economic hubs in Gloucestershire and Herefordshire. In this context there are potential cumulative effects on the regional economy from development in the plan area and vice versa.
- 8.4.22 The Cardiff Capital Region City Deal identifies regional economic challenges and opportunities for the ten authorities which comprise the Cardiff Capital Region. Addressing economic challenges and maximising opportunities are right at the heart of the rationale behind the City Deal and there is likely to be

significant potential for positive cumulative effects in relation to economy and employment in this context.

- 8.4.23 Development proposals in Newport are likely to be of particular significance in terms of cumulative effects from growth in Monmouthshire. Identified as a National Growth Area, Newport is a significant employment hub and population centre adjacent to Monmouthshire's southern boundary. The additional employment land and housing delivery in Newport could provide additional regional employment opportunities for workers from Monmouthshire and could potentially further bolster the business case for the eastward expansion of the South East Wales Metro. There could be particular cross boundary significance in relation to housing growth at the Severnside settlements as this could directly support the vitality of employment hubs along the M4 corridor. This will help maximise regional economic opportunities and is considered likely to have significant long term positive effects in relation to Monmouthshire and the Cardiff Capital Region more broadly. The Newport LDP also safeguards land for major road schemes including improvements to the M4 Motorway Junction 28, western extension of the Southern Distributor Road as the Duffryn Link Road between Maesglas and Coedkernew and the North South Link - Llanwern. Proposed development could increase traffic along the M4, A4042 and A449. However, in time the SE Wales Metro will likely to relieve some of this additional traffic burden, particularly in relation to radial commuting between Monmouth/ Abergavenny/ Chepstow and employment hubs at Newport and Cardiff.
- 8.4.24 The visitor economy is significant in Monmouthshire and the Brecon Beacons National Park is a key component of this in terms of visitor accommodation and associated services. The Brecon Beacons National Park Authority is its own LPA and therefore is able to propose development within Monmouthshire but outside the Monmouthshire LDP plan area. Growth in the key settlements of Brecon, Crickhowell, Hay-on-Wye and Talgarth is not likely to result in any significant interactions with development being proposed through the Monmouthshire RLDP. Therefore, no significant effects are anticipated in relation to economy and employment.
- 8.4.25 It is also considered that cumulative positive effects are likely in relation to economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.
- 8.4.26 The two English LPAs of Herefordshire Council and Forest of Dean District Council are adjacent to the plan area's eastern boundary, with much of the boundary of both comprising the Wye Valley Area of Outstanding Natural Beauty (AONB). There are key settlements in both authorities which have strong functional links with Monmouthshire as both Ross-on-Wye in Herefordshire and Coleford in Gloucestershire are located a short distance from Monmouth along the A40 and A4136 respectively. Housing and employment growth could have the potential to increase traffic, especially on key roads into and out of Monmouth in particular, and on the A48 through Chepstow to Tutshill and Sedbury. However, positive effects are considered likely overall by virtue of supporting the wider regional economy.

## Summary of likely effects

- 8.4.27 Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to **significant positive effects** for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.

## 8.5 Population and communities

- 8.5.1 A key consideration under the population and communities ISA theme is the provision of the right number of homes in the right places, including delivering a sufficient mix of housing types and tenures to meet different identified needs within the community.
- 8.5.2 In accordance with Strategic Policy S1 (Preferred Growth Strategy) the RLDP will deliver approximately 5,400 – 6,210 homes over the Plan period 2018-2033. The level of housing need is based on a demographic-led scenario with added policy assumptions<sup>17</sup>, providing a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040.
- 8.5.3 This level of growth is in general conformity with Future Wales' overall strategy. Although Monmouthshire is not within the national growth area identified in Future Wales 2040: the National Plan, supporting evidence shows that the proposed level of growth is essential to deliver the County's local evidence-based issues and objectives and ensure the RLDP is sound. It is supported by Future Wales policies 4, 5 and 7 in particular which support rural communities, the rural economy and the delivery of affordable homes.
- 8.5.4 Strategic Policy S1 (Growth Strategy) identifies a total housing target of 6,210 dwellings over the plan period based on a 15% flexibility allowance. On this basis, Strategic Policy S1 (Growth Strategy) is considered to have a significant long term positive effect as it proposes the delivery of enough new homes to meet identified needs, including affordable housing needs, and includes some flexibility should any sites not come forward.
- 8.5.5 In terms of the location of new housing and employment, Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) identifies the level of growth to come forward across the different settlement types. It identifies four strategic growth areas in the main towns of Abergavenny (inc. Llanfoist), Caldicot, Chepstow (inc. Severnside), and Monmouth (inc. Wyesham), which have been considered through the ISA process. These sites have provided sufficient evidence of viability and deliverability that will be built on as the plan progresses.

<sup>17</sup> 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.

- 8.5.6 Of note is Land to the East of Caldicot (Policy HA2), the largest of the strategic site allocations, which seeks to deliver 770 homes within a relatively deprived part of the community. In line with Strategic Policy S6 (Infrastructure), the strategic site will include a range of supporting infrastructure (education, employment, retail, and leisure) which will likely lead to positive effects in terms of supporting self-sustaining communities. Positive effects in this respect are also anticipated through the delivery of the strategic site Land to the East of Abergavenny (Policy HA1), which is also proposed for mixed use, including community uses.
- 8.5.7 More broadly, it is considered that the Spatial Strategy represents a reasonable approach to the distribution of growth as it will ensure that the delivery of new homes is focussed at the most sustainable locations and where there is greater need, i.e., the larger settlements which offer the broadest range of services, facilities, and transport options. Under Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy), Abergavenny is allocated 22% of growth over the plan period, Chepstow 13%, Monmouth (including Wyesham) 15%, and Caldicot (including the Severnside area) 35%. This translates to around 1,362 dwellings at Abergavenny, 829 at Chepstow, 923 at Monmouth, and 2,190 across the Severnside area. This growth is put forward under policies HA1 (Land to the East of Abergavenny), HA2 (Land to the East of Caldicot), HA3 (Land at Mounton Road, Chepstow), HA4 (Land at Leasbrook, Monmouth), HA5 (Land at Penlanlas Farm, Abergavenny), HA6 (Land at Rockfield Road, Monmouth), HA7 (Land at Drewen Farm, Monmouth), HA8 (Land at Tudor Road, Wyesham, Monmouth), and HA9 (Land at Former MoD, Caerwent). Growth is also put forward through committed sites, windfall sites, and infill opportunities – including those under policies HA10 to HA18.
- 8.5.8 The three secondary settlements of Penperlleni, Raglan and Usk are apportioned 6% (350 dwellings). This growth is included under allocation policies HA10 (South of Monmouth Road, Raglan), HA11 (Land east of Burrium Gate, Usk) and HA12 (Land west of Trem yr Ysgol, Penperlleni). The remaining dwellings would be distributed between the main and minor rural settlements, and through policies HA13-HA18. Growth is also put forward through committed sites, windfall sites, and infill opportunities. The strengths of this approach are that smaller settlements receive some allocated housing growth, helping to meet local housing need where it arises and ensuring the benefits of growth, such as the provision of new community infrastructure, are not simply directed to the highest tier settlements. This will likely ensure the delivery much needed affordable homes in the right places and address rural inequality and rural isolation in the lower tier areas.
- 8.5.9 Affordable housing is one of the key challenges facing the County's communities. The RLDP specifically seeks to address housing affordability, committing to the delivery of 1,595 – 2,000 affordable homes. This includes on the strategic site allocations, which will have on-site provision of affordable homes at 50% (Strategic Policy S7 Affordable Housing). Furthermore, Strategic Policy S7 (Affordable Housing) also outlines affordable housing thresholds for different sized residential development within settlement boundaries. This includes 50% on-site affordable housing on all new site allocations, 50% on-site affordable housing on sites of 20+ homes, and 40% on-site affordable housing on sites of 5-19 homes. For

developments of 1-4 homes, financial contributions towards the provision of affordable housing in the wider Monmouthshire area will be required; the same is required where conversions and subdivisions of houses is proposed. Linked to this, Policy H9 (Affordable Housing Exception Sites) outlines support for additional affordable housing adjoining Tier 1, 2, 3 and 4 settlements on sites that would not otherwise be released for residential development.

- 8.5.10 The commitment to affordable housing will lead to long-term positive effects, helping tackle Monmouthshire's housing need, homelessness, and social inequality. The supporting text of Strategic Policy S7 (Affordable Housing) highlights the significance of affordable housing for the RLDP, forming an integral part of the overarching Strategy. Provision will contribute positively towards addressing issues associated with the County's high house prices (relative to the Welsh average and relative to earnings), such as difficulties attracting and retaining younger age groups and anticipated increased demand for housing in Monmouthshire related to the removal of the Severn Bridge Tolls.
- 8.5.11 On balance it is considered that the Deposit Plan performs broadly positively in relation to the population and communities ISA theme given it will deliver above the level of objectively assessed housing need. In line with the Settlement Hierarchy, growth will be focused to the primary settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside), Chepstow and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements. The Settlement Hierarchy reflects the findings of the Sustainable Settlement Appraisal, which groups settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.
- 8.5.12 Other strategic policies likely to have a direct effect in relation to population and communities are Strategic Policy S3 (Sustainable Placemaking & High Quality Design) and Strategic Policy S6 (Infrastructure). Strategic Policy S3 establishes a range of criteria by which development will be expected to contribute to "*high quality, attractive and sustainable places that support the health and well-being of the community and respond to climate change*". This includes safe and inclusive design, co-locating different land uses to maximise public transport accessibility, incorporating green infrastructure and leveraging the natural, historic, and built character of a site to contribute to quality placemaking. This is reiterated in the supporting Policy PM1 (Creating well-designed places). This also links to Strategic Policy S8 (Site Allocation Placemaking Principles) – which seeks to ensure residential development complies with placemaking principles, including a mix of housing types, tenures and sizes and ensuring a safe and secure environment for all the community.
- 8.5.13 Strategic Policy S6 (Infrastructure) emphasises the importance of infrastructure in ensuring the sustainability of new development. The policy presents a comprehensive approach to seeking suitable new infrastructure through the development process, effectively establishing a hierarchy of mechanisms for infrastructure delivery. It sets an expectation that new or improved infrastructure "*must be provided as part of the proposed*

*development*". Furthermore, *"where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought"*. An expansive list of potential planning obligations is also presented which will be sought including infrastructure improvements that are *"necessary to make development acceptable"*. This policy is supported by Policy IN1 (Telecommunication, broadband and other digital infrastructure), which seeks to ensure appropriate infrastructure will come forward to support communities.

- 8.5.14 Strategic Policy S15 (Community and Recreation Facilities and Areas of Amenity Importance) performs positively in terms of planning for sustainable communities, focussing on ensuring provision or enhancement of accessible community and recreation facilities, defined in the supporting text as *"facilities used by the local communities for leisure, social, health, education and cultural purposes"*. It also establishes a presumption against the unjustified loss of such facilities. This is supported by Policy CI1 (Retention of Existing Community Facilities), Policy CI2 (Provision of Formal and Informal Open Space and Allotments / Community Growing Areas), Policy CI3 (Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing) and Policy CI4 (Areas of Amenity Importance), which all seek to maintain and enhance community infrastructure for the benefit of the populations in Monmouthshire.
- 8.5.15 It is important that the RLDP plans for the needs of the gypsy and travellers as well as the settled community. Strategic Policy S9 (Gypsy and Travellers) seeks to address this through a high-level commitment that *"land will be made available at Bradbury Farm, Crick for 7 pitches to accommodate unmet Gypsy and Traveller accommodation needs"*. This is supported by Policy GT1 (Gypsy, Traveller and Showpeople Sites).
- 8.5.16 The wider policies also work to bring forward benefits for the population and communities ISA theme. Policy GW1 (Green Wedge Designations) seeks to safeguard several key areas of land between settlements. This helps to retain individual settlement and community identities. Furthermore, Strategic Policy S13 (Sustainable Transport) works to support population and communities through maintaining and improving transport networks, allowing for a level of connectivity within and between settlements. Strategic Policy 14 (Town, Local and Neighbourhood Centres) also works to support population and communities through enhanced retail, commercial and social developments; this will help to support communities and reduce their need to travel outside of their settlements to access key services and facilities. This policy is supported by Policy RC1 (Central Shopping and Commercial Areas), Policy RC2 (Primary Shopping Frontages), Policy RC3 (Local Centres and Neighbourhood Centres / shops) and Policy RC4 (New Retail Proposals Outside of Identified Town and Local Centres). The need to protect and enhance retail, commercial and social development is also reflected in policies H1 (Residential Development in Primary and Secondary Settlements), H2 (Residential Development in Main Rural Settlements), and H3 (Residential Development in Minor Rural Settlements), which all seek to ensure development protects existing community uses.

## Cumulative effects

- 8.5.17 Development proposed within the Preferred Strategy has the potential for cumulative effects with growth proposed by other authorities within and beyond the Cardiff Capital Region, particularly in relation to the supply of a sufficient quantity of the new homes in sustainable locations.
- 8.5.18 The adopted and emerging development plans of all the surrounding local authorities propose meeting or exceeding their housing need. This means that the Deposit Plan's proposed housing delivery is contributing to a regional position of housing and infrastructure needs being met where it arises, which is a significant positive cumulative effect in relation to the population and communities ISA theme.
- 8.5.19 In this context there are likely to be positive effects in relation to accessibility to services and facilities throughout South Wales from the in-combination effects of proposed enhancements to cross-boundary public transport through the Cardiff City Deal. The County will also benefit in this respect from its links to England; Herefordshire to the north-east, South Gloucestershire and the Forest of Dean District to the east (on the other side of the River Wye), with links to South Gloucestershire via the Severn Bridge. Any cross-boundary sustainable transport improvements will make it easier to access existing services and facilities available at higher tier settlements, including those further afield at Newport, Cardiff, and Bristol, even in locations where the level of growth proposed may not support widespread provision of new local facilities.

## Summary of likely effects

- 8.5.20 Considering the above, it is anticipated that implementation of the RLDP will likely lead to **significant positive effects**. This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.

## 8.6 Health and wellbeing

- 8.6.1 The Growth Strategy under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) provides a level of growth (homes and jobs) that maximises the extent to which local evidence-based issues and objectives in the south of the County and River Usk catchment area can be addressed, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing the demography by ensuring that young people can choose to live in the County and responding to the climate and nature emergency; whilst also having regard to Welsh Government officer concerns regarding alignment with Future Wales: the National Plan 2040, and the phosphate constraints in the Upper River Wye catchment.
- 8.6.2 By virtue of directing the majority of growth to settlements in the two highest tiers of the settlement hierarchy the preferred strategy is likely to focus growth at locations which offer the potential for sustainable access to local

services and facilities. For example, much of the growth directed to Abergavenny under Policy HA1 (Land to the East of Abergavenny) will likely be delivered within around 1.5 miles of the town centre, which is considered to be a reasonable cycling distance to access key facilities and services. Furthermore, the site allocated under Policy HA3 (Land at Mounon Road, Chepstow) is located within the Chepstow settlement boundary to the west – allowing for easy access to services and facilities in the centre along the A48. The same can be said of the site allocated under Policy HA4 (Land at Leasbrook, Monmouth) – which is located within the Monmouth settlement boundary and adjacent to the A466.

- 8.6.3 Correspondingly, by directing a proportionately small amount of growth to Tier 3 and 4 the preferred strategy avoids significant growth at smaller settlements which are likely to have a higher rate of car dependency. This is consistent with the RLDP objective of enabling healthier lifestyles.
- 8.6.4 In relation to the largest of the strategic site allocations, Land to the East of Caldicot (Policy HA2), while the site has good proximity to local services, positive effects will also be delivered through the proposed mixed use local centre and employment space. This reflects the strategic nature of the site (770 homes), and will support sustainable, healthy communities.
- 8.6.5 The Growth Strategy also performs well by directing growth to locations with good potential for accessing services via healthy transport options (under policies HA6-HA18). While the actual degree of walking and cycling connectivity will partly be determined by detailed matters of design and layout, it is considered that in spatial terms, broadly positive effects can be concluded.
- 8.6.6 Consideration is also given under this ISA theme to the impact of the COVID-19 pandemic. Building Better Places Wales acknowledges the behavioural shift of increased cycling and walking activity, and new working from home patterns which have reduced overall need to travel. The RLDP policy framework seeks to maximise opportunities and further secure in the long -term this positive transport modal shift, kick started by the COVID-19 pandemic, from the car to active travel car-free journeys. Strategic Policy 13 (Sustainable Transport) performs particularly positively in this respect. Policy S13 (Sustainable Transport) stands out as being of particular significance in relation to health and wellbeing as it includes an explicit requirement for development proposals to “*reduce the need to travel*” and include “*promoting and prioritising active travel*”. The policy identifies that the existing Active Travel Network in Monmouthshire will need enhancing and expanding to ensure that walking and cycling are effectively promoted, achieved through maintaining and improving the Active Travel Network Maps to maximise engagement. The Active Travel Network is established by the Active Travel (Wales) Act 2013 and requires authorities to seek continuous improvement in cycling and pedestrian infrastructure. This means the policy is underpinned by a strong legislative platform which could act as an effective hook for ensuring developers design-in walking and cycling connectivity to the existing network when delivering new developments.
- 8.6.7 This links to Policy PROW1 (Public Rights of Way), which seeks to protect the existing Public Rights of Way network and add to it where appropriate. Furthermore, the delivery and enhancement of green infrastructure through



the development process as per Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) is likely to be an important element of boosting walking and cycling.

- 8.6.8 Other strategic policies likely to have a direct effect in relation to health and wellbeing are Strategic Policy S3 (Sustainable Placemaking & High Quality Design), Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery), and Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance). This is through the protection of existing green spaces and infrastructure, and the delivery of new green infrastructure, which will contribute to health and wellbeing by providing safe spaces to engage with physical activity, to the benefit of physical and mental health.
- 8.6.9 Furthermore, Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) offers support in principle for development proposals which provide or enhance community facilities, the definition of which includes GP surgeries and health centres. This links to Strategic Policy S6 (Infrastructure), which indicates planning agreements and obligations will need to include the consideration and appropriate provision of a number of key services and facilities, including health infrastructure and facilities. Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) also establishes a presumption against the unjustified loss of such facilities. It is considered that the policy is relatively passive, i.e., simply supports such facilities coming forward rather than actively seeks their provision. However, in the context of Monmouthshire, where the need for growth is not acute, this is considered a proportionate approach.
- 8.6.10 Strategic Policy S3 (Sustainable Placemaking & High Quality Design) could help support health and wellbeing by promoting the incorporation of *“an appropriate mix of uses, where applicable, to minimise the need to travel and to maximise opportunities for sustainable travel”*. This is understood to mean delivering a mixed range of services and facilities across the different use classes at the same accessible location so that residents only need to walk or cycle to one place to access retail, employment, leisure and so on. This is supported by Policy PM1 (Creating well-designed places), which indicates all development will need to ensure a safe environment that supports the community and integrates multifunctional green and blue infrastructure and public open space within site boundaries. This will allow for safe engagement with physical activity, including active transportation. Health is further safeguarded through Policy PM2 (Environmental Amenity), which stipulates development proposals will need to ensure it does not cause significant harm to local health – including through air and water pollution. The health of residents is also considered through Policy H7 (Specialist Housing), which seeks to ensure specialist housing development and extensions are located close to key services and infrastructure to allow for safe and convenient access and allow for the provision of support and care. This will allow for older residents to remain in their homes for longer.
- 8.6.11 The importance of sustainable placemaking has been identified in the Building Better Places document. Policy priorities include placing greater emphasis on creating neighbourhoods that enable residents to stay and

move locally to access most services and amenities through revitalised town centres and the provision of locally accessible green spaces. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) is therefore anticipated to lead to positive effects in terms of creating and sustaining high quality, connected communities. Other policies likely to perform positively in this respect include Strategic Policy 5 (Green Infrastructure, Landscape and Nature Recovery), Strategic Policy S14 (Town, Local and Neighbourhood Centres Hierarchy) and Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance).

- 8.6.12 Strategic Policy S14 (Town, Local and Neighbourhood Centres Hierarchy) focuses on ensuring retail, commercial and social development comes forward at levels appropriate to the settlement size. This will allow for the health and wellbeing of communities to be met within the settlements themselves. This is supported by Policy RC1 (Central Shopping and Commercial Areas), which seeks to safeguard the vitality, attractiveness and viability of central shopping and commercial areas within Abergavenny, Caldicot, Chepstow, Monmouth, Magor and Usk. This provides a further health and wellbeing benefit by protecting services and retail opportunities in these areas. The same can be said of Policy RC2 (Primary Shopping Frontages), which seeks to safeguard primary shopping frontages in Abergavenny, Caldicot, Chepstow and Monmouth, and Policy RC3 (Local Centres and Neighbourhood Centres / Shops).
- 8.6.13 Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) is further supported by Policy C11 (Retention of Existing Community Facilities) and Policy C13 (Safeguarding Existing Recreational Facilities, Public Open Spaces and Allotments / Community Growing), which safeguards existing neighbourhood and community facilities from redevelopment.
- 8.6.14 It is also recognised that Monmouthshire is a largely rural plan area and in practice there will likely continue to be a degree of car dependency for many residents to reach some higher tier services and employment where these are not available locally. However conversely, the RLDP acknowledges the behavioural shift of increased working from home patterns, which has been brought about by the unprecedented impact of the COVID-19 pandemic.

## Cumulative effects

- 8.6.15 The rural nature and substantial size of Monmouthshire contribute to its key settlements having a high degree of self-containment in terms of walking and cycling infrastructure, though some indirect inter-settlement connectivity exists through long distance rights of way and bridleways which crisscross the County. In this context there are limited strategic opportunities to seek cross boundary Active Travel Network infrastructure or to leverage the networks of other authorities in the region to build a coherent consolidated network. However, in the context of the Welsh Government's support for active travel and modal shift it is evident that individual authorities are increasingly seeking to incentivise walking and cycling. These efforts will likely contribute to a positive cumulative effect on the overall health outcomes of residents in the Cardiff Capital Region.

- 8.6.16 It is recognised that the role of the National Park as a sought-after destination for accessing the natural environment and growth within the Monmouthshire plan area will enable a greater number of people to access the Park for recreation and leisure with associated health and wellbeing benefits. For example, the Monmouthshire RLDP will deliver a substantial proportion of new residential development at Abergavenny from which access to the popular walking trails of Sugarloaf Mountain is easily achievable.

### Summary of likely effects

- 8.6.17 Overall, it is considered that the RLDP will have **significant positive effects** on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.

## 8.7 Equalities, diversity, and social inclusion

- 8.7.1 The focus of the equalities, diversity, and social inclusion ISA theme is reducing poverty and inequality, tackling social exclusion, and promoting community cohesion. Many aspects of equalities, diversity and social inclusion do not have a spatial dimension and are unlikely to be directly affected by the spatial distribution of growth through the Preferred Strategy. For example, promoting community cohesion is likely to be most directly influenced through detailed policies which have the granularity to deliver focused responses at specific locations.
- 8.7.2 However, it is considered that focusing new development through Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) on the primary settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements, will help to support and sustain a hierarchy of vibrant centres across the County. The delivery of strategic site allocations through Policy HA1 (Land to the East of Abergavenny), Policy HA2 (Land to the East of Caldicot), Policy HA3 (Land at Mounton Road, Chepstow) and Policy HA4 (Land at Leasbrook, Monmouth) will support the growth of and regeneration of existing communities, and improving access to housing, jobs, and services. This is especially true of Policy HA2 (Land to the East of Caldicot), which is allocated for mixed-use development – non-residential development under this policy (for example, the primary school and local centre) will contribute to the provision of Caldicot and its support of the settlement population.
- 8.7.3 Channelling an appropriate level of growth to the County's most sustainable locations, including rural settlements, is also considered to lead to positive effects, enabling local people to remain in their communities rather than have to seek opportunities for housing and employment elsewhere. This will be achieved through the delivery of housing through Policies HA5 to HA18.

- 8.7.4 However, it is difficult to conclude that growth in rural settlements and rural areas will address existing deprivation in terms of access to jobs, healthcare and opportunities as the distribution set out in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) (9% across Tiers 3 and 4) means growth will be unlikely of a scale which unlocks significant investment or enhancement in these areas. On balance, it is considered that the scale and distribution of growth is likely to have a minor positive effect in relation to equalities, diversity, and social inclusion.
- 8.7.5 Affordable housing provision is a key issue for the County and forms an integral part of the overarching strategy with 50% provision being sought on all new site allocations (Strategic Policy S7 Affordable Housing). This provision will assist in attracting and retaining a younger, economically active population and balancing the ageing population.
- 8.7.6 The provision of land for Gypsy and Travellers will also contribute to addressing equalities, diversity, and social inclusion. By designating land through Strategic Policy S9 (Gypsy and Travellers) and through the supporting Policy GT1 (Gypsy, Traveller, and Showpeople Sites), the RLDP is ensuring it provides for all communities within Monmouthshire. It also allows for enhanced levels of inclusion through ensuring sites are adjacent to settlement boundaries.
- 8.7.7 Other strategic policies most likely to have indirect effects on equalities, diversity and social inclusion are Strategic Policy S3 (Sustainable Placemaking and High Quality Design) and Strategic Policy S6 (Infrastructure).
- 8.7.8 There is clearly an economic and educational dimension to tackling poverty and exclusion as it is critical that people are given the opportunity to acquire skills and education which empowers them to enter the workplace and find stable, high-quality employment. In this sense Strategic Policy S6 (Infrastructure) could potentially play a role through the requirement to provide “*new or improved infrastructure and facilities to remedy deficiencies*” given that this includes education facilities. However, where deficiencies in provision currently exist it is not clear whether the policy would be effective in addressing the existing shortfall as well as providing additional capacity for new development, or whether this simply means existing provision would be deficient once additional growth is added. Effects are uncertain in this respect.
- 8.7.9 Placemaking can play a role in tackling social exclusion through well designed, barrier-free environments which can be entered and used safely and with dignity by all members of the community. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) seeks sustainable places which support community wellbeing, including through the implementation of “*safe and inclusive design that offers ease of access for all*” and could have potential for minor positive effects. Related to this, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) seeks to maintain, protect, and enhance the green infrastructure network in Monmouthshire – including accessible multifunctional interconnected spaces and routes.

8.7.10 Access to a range of types and tenures of genuinely affordable housing is an important element of tackling poverty and social exclusion – as demonstrated through Policy H8 (Housing Mix). Strategic Policy S7 (Affordable Housing) will therefore be a key lever by which affordable housing is delivered in Monmouthshire. The supporting text of the policy recognises that certain groups within the community are often particularly in need of affordable housing, such as elderly people and younger age groups who may otherwise not be able to afford to continue living locally. This links to Policy H7 (Specialist Housing), which seeks to permit specialist housing to provide for levels of support and care – allowing for older residents to remain in their homes for longer. In the context of Monmouthshire where average house prices are significantly above the average for Wales it will be of great importance that a sufficient range and choice of affordable housing is delivered which enables people to remain living in their community if they wish to do so.

### Cumulative effects

- 8.7.11 Addressing the equalities, diversity and social inclusion objectives is not considered to be a primarily spatial matter. In this sense there are unlikely to be significant cumulative effects from development proposed in the Deposit Plan and development in surrounding authorities.
- 8.7.12 However, there is a degree of cross-cutting between the equalities theme and other ISA themes, particularly in relation to the role of affordable housing and educational opportunities in tackling entrenched poverty and deprivation. In this sense the fact that Monmouthshire and its regional partners are all proposing meeting or exceeding their housing need could be perceived as a positive, as it could offer opportunities to meet complex housing needs within particularly deprived communities, particularly in post-industrial settlements which have struggled over time to develop their economic vitality.
- 8.7.13 Additionally, it is recognised that the proposed enhancements to regional public transport through the Cardiff Capital Region City Deal and SE Wales Metro rollout will have potential to ease access to employment and training opportunities as well as services more broadly. Increased accessibility could have potential to reduce social exclusion and reduce some dimensions of deprivation.
- 8.7.14 It is considered that cumulative effects in relation to equalities, diversity and social exclusion are likely to be a minor positive effect overall. Although elements of tackling entrenched deprivation and inequality are likely to be influenced by targeted action addressing specific needs at a local level, the collective action of authorities at a regional scale is likely to deliver similar benefit, or potentially even greater benefit, from all the investment being stimulated through the Cardiff City Deal and other LDPs in the region.

### Summary of likely effects

- 8.7.15 Considering the above, it is anticipated that **significant positive effects** will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for

development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements.

## 8.8 Transport and movement

- 8.8.1 The transport and movement ISA objectives include improving access to jobs and services, reducing private vehicle use through promoting active travel and encouraging modal shifts, and improving access to high-speed digital infrastructure. The Spatial Strategy seeks to maximise the opportunities presented by the COVID-19 pandemic, and subsequent behavioural shift seen in people's commuting patterns, such as increased working from home.
- 8.8.2 The distribution of growth proposed by the RLDP growth strategy performs reasonably positively in relation to the first of these objectives as it capitalises on existing transport links at the higher tier settlements to direct growth to locations served by transport hubs. By focusing new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including the Severnside area) and Monmouth (including Wyesham), the strategy ensures that new residential development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Bristol, and Newport. Similarly, new employment growth in Abergavenny, Chepstow and Caldicot will be accessible by train.
- 8.8.3 Underpinning the spatial strategy are four strategic site allocations, proposed through Policy HA1 (Land to the East of Abergavenny), Policy HA2 (Land to the East of Caldicot), Policy HA3 (Land at Mouton Road, Chepstow) and Policy HA4 (Land at Leasbrook, Monmouth). All sites perform well in terms of improving access to jobs and services, including sustainable transport. For example, strategic sites at Abergavenny and Chepstow benefit from train stations served by frequent services, and the strategic sites at Caldicot and Monmouth are located adjacent to strategic roads (B2425 in Caldicot, and A466 at Monmouth).
- 8.8.4 Strategic growth focussed under Policy HA2 (Land to the East of Caldicot) is also positive in transport terms given that the area is served by two train stations. Both stations are within close proximity of each other at Rogiet and Caldicot, and it is also considered that given the level of growth proposed (770 homes in the plan period and further development beyond), supporting infrastructure for the site would be extensive.
- 8.8.5 Any infrastructure delivery would also support the far west of the Severnside area (including Magor) which is currently limited in terms of practical walking or cycling options for accessing either train station. It is further noted that the new South Wales Metro plan designates Magor as a location for a rail station (Magor Walkway Station). It is considered that directing growth to the strategic site under Policy HA2 (Land to the East of Caldicot) is a clear positive, as it reduces growth in other locations with very limited public transport.

- 8.8.6 Furthermore, the strategic site allocation policies do make provisions for transportation and movement. All four policies seek to provide on and off-site highways infrastructure improvements – which will help ensure the existing transportation network is able to continue to support local journeys by new and existing residents. Policy HA1 (Land to the East of Abergavenny) indicates development will have a park and ride facility linking to the train station, and active travel networks to the train station and the settlement centre. It also indicates there will be good quality, safe and accessible pedestrian and cycle linkages to key access points (including key services and transport infrastructure), as well as greater connectivity with the existing public rights of way network. This will help to encourage a greater engagement with active and public transportation opportunities. Providing key connections to the town centre and walking and cycling routes is a focus of Policy HA2 (Land to the East of Caldicot).
- 8.8.7 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire’s Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the RLDP performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that the development is unlikely to have a positive effect in relation to the majority of inter-settlement travel.
- 8.8.8 The priority for the ‘reduction in the need to travel’ and a shift away from the private car for travel is reflected in the Welsh Government’s Future Wales: The National Plan 2040 and ‘Llwybr Newydd – The Wales Transport Strategy 2021’. The RLDP seeks to establish the foundations to encourage longer term changes to the historic high level of car usage in Monmouthshire. The spatial strategy therefore focuses development in the County’s most sustainable settlements of Abergavenny (including Llanfoist), Chepstow Caldicot (including Severnside), and Monmouth (including Wyesham), that provide opportunities for a reduction in travel and provide opportunities for sustainable transport (see Sustainable Settlement Appraisal 2021).
- 8.8.9 However, Monmouthshire is predominantly a rural County and as set out in Future Wales Policy 5, there are clearly significant disparities between urban areas with regard to the feasibility of delivering effective public transport systems and active travel routes. To address this, Llwybr Newydd: the Wales Transport Strategy has committed to a ‘Rural Pathway’ which sets out how regional Corporate Joint Committees (CJCs) and Welsh Government policy makers will work together on strategies to tailor solutions to extend the geographical reach of public transport links into rural areas. This is reflected through Strategic Policy S13 (Sustainable Transport), which supports development in rural areas where it “*enables solutions to rural transport problems*”.
- 8.8.10 The behavioural shift in people’s commuting patterns since the COVID-19 pandemic is also acknowledged in the RLDP. It aims to build on the



increased cycling and walking activity and working from home patterns, as highlighted through the Welsh Government's Building Better Places document. The RLDP seeks to maximise opportunities and further secure this positive transport modal shift, kickstarted by the COVID-19 pandemic, from the car to active travel car-free journeys. Distributing growth based on the settlement hierarchy outlined in Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) is anticipated to lead to long term positive effects in this respect, enabling the delivery of sustainable and resilient communities.

- 8.8.11 Strategic Policy S13 (Sustainable Transport) is likely to have the most direct positive effects in relation to transport and movement. The policy establishes a presumption in favour of development which accords with PPW12's Sustainable Transport Hierarchy. Where sites are available to support this approach, this will help embed sustainability and accessibility into new development by integrating walking and cycling and public transport access into the location, design, and layout of new schemes. This principle is supported by other strands of the policy, which seeks to maintain and improve the existing Active Travel Network and promote and prioritise active travel uptake. This links to Policy PROW1 (Public Rights of Way), which seeks to protect the public rights of way network through retaining or relocating contributing routeways and providing new ones where appropriate. It also links to Policy ST5 (Transport Schemes), which seeks to protect active travel schemes in key settlements in Monmouthshire, as well as public transport improvement schemes and road schemes.
- 8.8.12 Strategic Policy S13 (Sustainable Transport) is underpinned by a number of additional policies. Policy ST1 (Sustainable Transport Proposals) includes the need for development to be accompanied by a Transport Assessment where they are likely to significantly impact upon trip generation and travel demand. This will help to develop a strategy to reduce the need to travel, as well as facilitate, promote, and prioritise active and public transport. This will help reduce the number of vehicles on the highway network and could contribute to reducing occurrences of traffic related issues, such as congestion. The policy also indicates that financial contributions should be made for safety and/ or congestion mitigation measures, or for highway improvements, where appropriate. This will likely include the routes identified in Policy ST2 (Highway Hierarchy). Policy ST3 (Freight) works to reduce the impact of freight on the road network through supporting transfer points between road/ rail/ last mile sustainable transport – which will likely contribute to reducing traffic on the network and reducing congestion at key points. Finally, Policy ST6 (Protection of Redundant Routes) seeks to safeguard former routes (for example, canal and rail routes) that could contribute to future sustainable transport use.
- 8.8.13 Another strategic policy that is likely to have an effect in relation to the transport and movement ISA theme is Strategic Policy S3 (Sustainable Placemaking and High Quality Design), which indicates that development must minimise the need to travel and maximise opportunities for sustainable transportation. This will help contribute to reducing the number of vehicles on the road. Strategic Policy S4 (Climate Change) includes the need for development to provide ultra-low emission vehicle charging infrastructure where appropriate, which will likely contribute to the transport and movement



ISA theme by helping to reduce combustion engine vehicles on the local road network. This is reiterated in Policy NZ1 (Monmouthshire Net Zero Carbon Homes), and Strategic Policy S8 (Site Allocation Placemaking Principles).

- 8.8.14 Strategic Policy S8 (Site Allocation Placemaking Principles) also includes stipulations for transport and movement through residential development. This includes prioritising active travel to and from the site, bringing forward improvements to the active and public transportation networks, and maintaining highway safety, capacity, and operation. These stipulations are likely to positively contribute to the transport and movement ISA theme through encouraging uptakes in active and public transportation options and maintaining and enhancing network safety for all users.
- 8.8.15 Strategic Policy S6 (Infrastructure) also makes provision for transport and movement by ensuring planning agreements and obligations consider the appropriate provision of sustainable transport measures and transport infrastructure. By ensuring development fully considers this, the RLDP is helping to reduce negative impacts on the transport network in Monmouthshire – for example, making sure there is a sufficient level of public transport that is easily accessible will likely contribute to reducing traffic and congestion on the local road network linked to additional cars.
- 8.8.16 The wider plan policies also have a transport and movement focus. This includes Policy LC4 (Wye Valley National Landscape (AONB)), which indicates development within the designated area will need to consider how it will generate additional traffic and improvements for existing roads and lanes. Furthermore, Policy GT1 (Gypsy, Traveller and Travelling Showpeople) indicates sites will need to have safe and convenient access to the highway network and not cause traffic congestion. Traffic congestion is also a focal point of Policy RE5 (Intensive Livestock / Free Range Poultry Units), which indicates this type of development will be permitted where there are no serious implications on the surrounding highway network. These policies will help to ensure the existing transportation network is not compromised by development contributing additional traffic. Furthermore, Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) includes the need for sustainable tourism proposals in the open countryside to prioritise, promote and facilitate sustainable travel opportunities, and include safe and efficient highway design. Again, this contributes to encouraging active and sustainable transportation opportunities over increasing private vehicle usage, which is likely to bring forward positive effects for the transport and movement ISA theme through reduced impacts to the highway network.

## Cumulative effects

- 8.8.17 There is potential for both negative and positive cumulative effects in relation to transport and movement, particularly in relation to cross boundary roads and railways which stand to be impacted by development both within Monmouthshire and regionally.
- 8.8.18 Existing travel patterns in Monmouthshire reflect its rurality, particularly a trend for relatively long travel to work distances, high levels of car ownership and reliance on the private car. The primary points of road congestion in the

region are on the M4, with the recent South East Wales Transport Commission Final Recommendations Plan (2020) highlighting that *“there is an acute congestion problem on the M4 in South East Wales, particularly on the approach to the Brynglas tunnels. The single biggest cause – by some margin – is the sheer traffic volume at peak times, especially associated with commuting”*.<sup>18</sup> The 2019 decision not to progress an M4 relief road<sup>19</sup> circumventing the Newport tunnel bottleneck could have effects in combination with growth at Monmouthshire, Newport and in the West of England resulting in additional congestion over time. This in turn could increase the duration of car and HGV journeys between south Monmouthshire, Newport, and Cardiff. It is however recognised that the Final Recommendation Plan (2020) sets out a number of recommendations to address the M4 congestion, which may reduce adverse effects in the long term.<sup>20</sup>

- 8.8.19 There could also be potential for increased traffic along the M4, A4042 and A449 as a result of growth within Newport. Additionally, growth in the Heads of the Valleys, while likely to boost the regional economy, could lead to increased pressure on the road network, particularly the A465. However, it is noted that the A465 has recently undergone significant enhancement, including dualling of the carriageway in places, and capacity has therefore been boosted.
- 8.8.20 Links to Herefordshire Council and Forest of Dean District Council could also lead to increased congestion in Monmouthshire’s key settlements in the south/ east. Notably there is an existing commuter flow of residents from the south of the Forest of Dean along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48, both of which are trunk roads for these relevant stretches through Monmouthshire. Additional development between Lydney and Chepstow could exacerbate existing traffic issues in Chepstow. It is however recognised that the Forest of Dean Local Plan will likely offer measures which will mitigate the increase in congestion around Chepstow.
- 8.8.21 Cumulative effects in relation to public transport are projected to be largely positive, as future growth of the Cardiff City Region is underpinning the business case for the SE Metro rollout. This includes enhanced heavy rail connectivity between Cardiff and Abergavenny and Chepstow. In the context of early uncertainties around the extent of the SE Wales Metro rollout, growth proposed in the neighbouring authorities within the Cardiff City Region contribute to this positive cumulative effect through the introduction of additional users of the network to create a robust business case for expansion.

## Summary of likely effects

<sup>18</sup> South East Wales Transport Commission (2020) Final recommendations [online] available at:

<https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf>

<sup>19</sup> Welsh Government (2019) ‘M4 corridor around Newport: decision letter’ [online], available at: <https://gov.wales/m4-corridor-around-newport-decision-letter>

<sup>20</sup> South East Wales Transport Commission (2020) Final recommendations [online] available at:

<https://gov.wales/sites/default/files/publications/2020-11/south-east-wales-transport-commission-final-recommendations.pdf>

8.8.22 Considering the above, **significant positive effects** are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure. Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.

## 8.9 Natural resources (air, land, minerals, and water)

- 8.9.1 Whilst air quality is not a significant issue for the County, it is recognised that air pollution is a major cause of death and disease globally<sup>21</sup>. The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Chepstow and Usk for nitrogen dioxide (NO<sub>2</sub>)<sup>22</sup>. Strategic Policy S1 (Growth Strategy) sets out the approach to focus new development on the primary settlements of Abergavenny (including Llanfoist), Chepstow Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements. This is in combination with the outcome of the Sustainable Settlement Appraisal (2021). The Appraisal established a sustainable settlement hierarchy that reflects those communities best placed to accommodate sustainable growth based on accessibility to sustainable transport, the availability of local services and the level of employment opportunities.
- 8.9.2 Focusing growth towards the most sustainable communities is likely to lead to positive effects in terms of supporting levels of self-containment in the higher tier settlements, reducing the need to travel where possible, and subsequently reducing levels of NO<sub>2</sub>. However, as a Tier 1 settlement, Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) states that around 829 dwellings will be directed to Chepstow during the plan period, which has the potential to exacerbate NO<sub>2</sub> levels within the AQMA through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. This includes strategic site allocation Land at Mounon Road, Chepstow (Policy HA3), which is located in the northwest of Chepstow close to the A466.
- 8.9.3 Conversely, it is noted that Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy) identifies Usk as a secondary settlement (along with Raglan and Penperlleni), with only 350 dwellings distributed between these settlements. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2016), and subsequently

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<sup>21</sup> World Health Organisation (2019) Ambient air pollution: Health impacts <https://www.who.int/airpollution/ambient/health-impacts/en/>

<sup>22</sup> Air Quality in Wales (2019) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

through the South East Wales Transport Commission Final Recommendations Plan: November 2020. This will inform the RLDP<sup>23, 24</sup>.

- 8.9.4 It is noted that through Strategic Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), approximately 2,190 homes are to be delivered in the Severnside area. This includes 770 homes at the Land to the East of Caldicot site allocation under Policy HA2. Delivering strategic growth to the South of the County has the potential to lead to positive effects through capitalising upon the strategic links to the Great Western Cities, Cardiff Capital Region, and SW / Bristol region. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which may provide opportunity for building more sustainable communities and improved air quality in the South of the County. Furthermore, it is recognised that the strategic site allocation will deliver supporting infrastructure alongside housing, which is likely to include active and sustainable travel improvements, supporting self-containment and reduced reliance on the private vehicle.
- 8.9.5 More broadly, it is considered that the programme outlined in the LTP (2016) will support sustainable communities across the County, including through the delivery of walking and cycling infrastructure, bus network improvements, station and highways improvements, Cardiff Capital Region Metro schemes, 20mph limits and road safety schemes. This coincides with higher level policy frameworks, and in accordance with Welsh Government guidance it does not contain specific rail service and trunk road proposals. It is noted that in 2023 Monmouthshire County Council launched a public consultation on the next draft Local Transport Plan; this closed on the 5<sup>th</sup> January 2024.
- 8.9.6 The uptake of sustainable transportation is likely to contribute to reducing air pollution through ensuring active and public transportation opportunities are viable options. This is reiterated through Strategic Policy S13 (Sustainable Transport), which includes the need for “*ensuring development enables transition to Ultra Low Emission Vehicles (ULEVs) by providing necessary underlying infrastructure*”. This will contribute positively towards reducing atmospheric levels of NO<sub>2</sub> and improving air quality within Monmouthshire.
- 8.9.7 The uptake of sustainable travel to improve air quality is further supported through Strategic Policy S2 (Sustainable Placemaking and High Quality Design) and Strategic Policy S6 (Infrastructure); which requires development proposals to “*incorporate an appropriate mix of uses to minimise the need to travel and to maximise opportunities for sustainable transport use*”.
- 8.9.8 Monmouthshire is predominantly rural, and it is therefore acknowledged that the brownfield land resource is particularly limited. In line with Policy S2 (Spatial Distribution of Development - Settlement Hierarchy), the majority of growth is being directed to the Tier 1 Settlements, with the intention of utilising brownfield land where possible. This will contribute positively towards meeting the ISA objective to “*...maximise opportunities for development on previously developed land*”.

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<sup>23</sup> Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

<sup>24</sup> South East Wales Transport Commission (2020) South East Wales Transport Commission: Final Recommendations Plan [online] available at: <https://gov.wales/south-east-wales-transport-commission-final-recommendations>

- 8.9.9 In terms of specific loss of greenfield land, the spatial strategy performs negatively as a result of strategic site allocations at Abergavenny, Chepstow, Caldicot and Monmouth. Further greenfield loss is expected through allocations under Policies HA5-HA18 – though these areas are likely to be small, cumulatively the greenfield loss is expected to be more significant.
- 8.9.10 In terms of agricultural land quality throughout Monmouthshire, it is recognised that there is a high percentage of best and most versatile agricultural land (i.e., Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e., Grade 3b, 4 and 5). The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988). This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:
- Primary Settlements: these are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high-quality Grade 2 land and non-agricultural land are present around Chepstow and Monmouth, as well as Grade 3a land. Severnside is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor / Undy, and north of Sudbrook.
  - Secondary Settlements: these areas include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east / and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan’s urban area.
  - Main and Minor Rural Settlements: these areas are particularly constrained, being located outside of the main settlements where there is a significant amount of BMV agricultural land. This reflects the rural nature of the County. It is noted that the Preferred Strategy does not yet establish where growth may be located in the County’s rural areas.
- 8.9.11 It is considered that directing a significant proportion of growth to the Tier 1 settlements (Strategic Policy S2: Spatial Distribution of Development – Settlement Hierarchy) will protect best and most versatile agricultural land where possible. This is in accordance with PPW12, which states that *“agricultural land of grades 1, 2 and 3a is the best and most versatile and should be conserved as a finite resource for the future”*. However, as set out in the RLDP, the widespread distribution of BMV agricultural land (surrounding all settlements to some extent) means that development anywhere in the County will likely lead to residual adverse effects.
- 8.9.12 The delivery of strategic sites within Abergavenny, Chepstow, Caldicot and Monmouth will likely result in the loss of BMV agricultural land. Based on the Predictive ALC model for Wales (2017), the four strategic site allocations are located on high quality agricultural land, with the site under Policy HA1 (Land



to the East of Abergavenny) located on an area grade 2 / 3a agricultural land, the site under Policy HA2 (Land to the East of Caldicot) being on an area of grade 1 (which is mostly floodplain and would not be developed) surrounded by grade 2. The site under Policy HA3 (Land at Mouton Road, Chepstow) is underlain with grade 3a, and the site under Policy HA4 (Land at Leasbrook, Monmouth) is a mix of grade 2, 3a and 3b. It is noted that every effort will be made to, where possible, protect the higher grades of BMV land; and to avoid / or minimise the loss of BMV land. This will contribute positively towards meeting the ISA objective to promote the efficient use of land.

- 8.9.13 In terms of the County's mineral resource, the latest South Wales Regional Aggregates Working Party (SWRAWP) Annual Report (2021) establishes that at the end of 2018 Monmouthshire had a greater than 50 year's supply of crushed rock reserves<sup>25</sup>. In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within the RLDP. A revised Regional Technical Statement (RTS) - 2nd Review was published in 2020. The 2nd Review (RTS2) makes recommendations for the apportionments necessary to ensure an adequate supply of crushed rock, including the nationally recommended minimum provision of 7 and 10 years, are available for the entire duration of the RLDP. The total apportionments required for Monmouthshire are zero for land-won sand & gravel and 5.866 million tonnes for crushed rock. These compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 11.25 million tonnes for crushed rock (as of 31st December 2016). When compared against the apportioned requirement as set out in the RTS2, Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP when determined on a Local Planning Authority basis.
- 8.9.14 Whilst it is considered that there would be no negative impact on Monmouthshire's mineral resource through the Preferred Strategy as mineral landbank obligations can be met, the RLDP does have the potential to impact upon the Limestone Mineral Safeguarding Area (MSA) present in parts of the south of the County<sup>26</sup>. Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) directs around 2,190 dwellings towards the Severnside area in the south of the County, including through the delivery of strategic site allocation under Policy HA2 (Land to the East of Caldicot). As such, development could have an impact on the MSA.
- 8.9.15 It is considered that in accordance with national and regional policy requirements, a sustainable approach to minerals planning will be adopted. This is evidenced through Strategic Policy S16 (Sustainable Minerals Management) and supporting Policy M1 (Local Building and Walling Stone), Policy M2 (Minerals Safeguarding Areas) and Policy M3 (Mineral Site Buffer Zone), which work to safeguard sensitive mineral deposits by preventing development occurring in certain areas and allowing for the reopening of small-scale quarries for building and walling stone (where appropriate).

<sup>25</sup> South Wales Regional Aggregates Working Party (2024) Annual Report 2021 [http://www.swrawp-wales.org.uk/html/SWRAWP\\_Annual\\_Report\\_2021\\_Final.pdf](http://www.swrawp-wales.org.uk/html/SWRAWP_Annual_Report_2021_Final.pdf)

<sup>26</sup> North Wales and South Wales Regional Aggregates Working Parties (2014) Regional Technical Statement - 1st Review <https://www.merthyr.gov.uk/media/4451/sd44-south-wales-regional-aggregates-working-party-regional-technical-statement-1st-review-august-2014.pdf>

- 8.9.16 Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The total demand for water for this WRZ is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.
- 8.9.17 Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every five years to take account of predicted growth and ensure that there are schemes in place to meet future demands.
- 8.9.18 In terms of water quality, following new evidence about the environmental impacts of phosphates in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for river water quality and has assessed the nine riverine Special Areas of Conservation (SAC) in Wales. Within Monmouthshire, it was identified that 88% of the River Usk's water bodies failed to meet the required target and within the River Wye 67% failed to meet the required target. As a result of this failure NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. The spatial strategy has regard to this latest position on the phosphates water quality issue and associated requirements to demonstrate neutrality or betterment when proposing development. The strategy has been developed following ongoing discussions with NRW and Dŵr Cymru Welsh Water on future strategic solutions for phosphate mitigation within the river catchment areas.
- 8.9.19 In accordance with PPW (2024) development coming forward through the RLDP will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. PPW (2024) states that "*New development should be located and implemented with sustainable provision of water services in mind, using design approaches and techniques which improve water efficiency and minimise adverse impacts on water resources, including the ecology of rivers, wetlands and groundwater and thereby contributing towards ecological resilience*". This is reinforced through Strategic Policy S4

(Climate Change) which requires all development proposals to incorporate water efficiency measures and minimise adverse impacts on water resources and quality. This will contribute positively towards meeting the ISA objective to promote the efficient use of natural resources including providing increased opportunities for water efficiency. The RLDP makes further provisions for water quality through Policy PM2 (Environmental Amenity), which seeks to protect water quality by not allowing development to come forward where there would be a significant risk of / harm to water resources.

## Cumulative effects

- 8.9.20 There is the potential for a cumulative loss of greenfield land and BMV agricultural land as a result of the distribution of housing to meet the need of the wider South Wales region, and neighbouring English authorities. Development proposed through the RLDP has the potential to interact with development proposed through neighbouring authority plans to result in cumulative significant loss of greenfield land and BMV agricultural land.
- 8.9.21 The County has regional obligations to be met in terms of Minerals planning, forming part of the former Gwent sub-region along with Torfaen, Newport, and Blaenau Gwent. However, when compared against the apportioned requirement as set out in the RTS2, (2020), Monmouthshire has a surplus of provision and therefore no further allocations for future working are specifically required to be identified within the RLDP.
- 8.9.22 There is the potential for development proposed through the Deposit Plan to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. More broadly, it is considered that water resources and wastewater treatment capacity are generally managed at a catchment level and there is close working between Natural Resources Wales, Welsh Water, and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the total demand for water in the County is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050, it is considered that the RLDP will not have a significant negative cumulative effect on this ISA theme.

## Summary of likely effects

- 8.9.23 In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, **significant negative effects** are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.

## 8.10 Biodiversity and geodiversity

- 8.10.1 In terms of internationally designated sites, it is recognised that the plan area is particularly constrained. HRA screening (November 2022) found that the



following European sites within 15km of Monmouthshire and impact pathways need to be considered in more detail through the Appropriate Assessment (AA) stage:

- Usk Bat Sites SAC (atmospheric pollution, recreation and loss of functionally linked land).
- Cwm Clydach Woodlands SAC (atmospheric pollution).
- Wye Valley Woodlands SAC (atmospheric pollution, recreation).
- Severn Estuary SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow).
- Severn Estuary SPA / Ramsar (atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow).
- River Wye SAC (atmospheric pollution, recreation, water quality and water quantity, level and flow).
- River Usk SAC (recreation, water quality and water quantity, level and flow).
- Wye Valley and Forest of Dean bat Sites SAC (loss of functionally linked land); and
- Sugar Loaf Woodlands SAC (recreation).

8.10.2 The HRA also explored potential impact pathways in relation to the four Preferred Strategic Site Allocations proposed in the RLDP. The HRA found that for all four strategic site allocations, LSEs cannot be excluded, and they were subsequently screened in for AA.

8.10.3 With nutrient neutrality solutions now in place, the HRA AA has subsequently concluded that the RLDP contains a sufficient policy framework, and that no adverse effects would arise on habitat sites alone or in combination with other plans or projects coming forward in Monmouthshire.

8.10.4 The level of development proposed and directed to these areas under Strategic Policies S1 (Growth Strategy) and S2 (Spatial Distribution of Development – Settlement Hierarchy) has the potential to result in impacts on the designated sites and wider biodiversity. Of note, Land to the East of Abergavenny (Policy HA1) has the potential to lead to habitat loss and recreational disturbance of the nearby ancient woodland and habitats present within / surrounding the site. There is also the potential for negative effects through the delivery of Land to the East of Caldicot (Policy HA2), given the presence of the Severn Estuary SPA / SAC / Ramsar site / SSSI within 1.2km of the site, as well as the adjacent ancient woodland at Farthing Hill. It is also recognised that all four strategic sites are greenfield and therefore have the potential to hold biodiversity value. Notably, there are sparse mature trees present throughout Land to the East of Caldicot (Policy HA2) which could be lost or damaged.

8.10.5 It is however considered that development proposals should seek to retain and enhance features where possible, ensuring no net loss, and deliver biodiversity net gain in accordance with national policy. Furthermore, the strategic nature of the sites present an opportunity to exceed the mandatory requirement of 10% net-gain, with the potential for significant long-term

- positive effects. This can be achieved through measures outlined in Strategic Policy S8 (Site Allocation Placemaking Principles), including the incorporation of multifunctional streetscapes, retention of green features including trees, and enhancing semi-natural habitats and the ecological connectivity between them.
- 8.10.6 There are a number of other policies that support or permit a type of development that could have impacts on designated or wider biodiversity interests. This includes Policy CC2 (Renewable Energy Allocation) and Policy CC3 (Renewable Energy Generation), Policy IN1 (Telecommunication, broadband and other digital infrastructure) which supports infrastructure development. This also includes the housing policies H1 to H8, Strategic Policy S9 (Gypsy and Travellers) and Policy GT1 (Gypsy, Traveller and Showpeople Sites), which seek to support housing development. All of these policies have the potential to impact upon biodiversity through potential changes to or losses of habitats, as well as changes to the biodiversity network and associated connectivity.
- 8.10.7 However, it is recognised that some of the policies that support or permit development have specific biodiversity stipulations. Policy CC3 (Renewable Energy Generation) indicates proposals must not bring forward unacceptable adverse impacts to biodiversity, and environmental benefits directly related to development will need to outweigh any potential negative impacts. Whilst Policy IN1 (Telecommunication, broadband and other digital infrastructure) does not make specific stipulations for biodiversity, the overarching Strategic Policy S6 (Infrastructure) indicates improvements to infrastructure, facilities, services and related works will need to include consideration and appropriate provision of green and blue infrastructure and ecological mitigation and enhancement. This will bring forward benefits for biodiversity by improving connectivity between habitats and designated sites through increased green and blue infrastructure.
- 8.10.8 Benefits for biodiversity are also anticipated to come forward through Strategic Policy S10 (Employment Site Provision) and Strategic Policy S11 (Rural Economy), which indicate all proposals relating to employment will need to protect the natural environment and ensure no unacceptable harm comes to surrounding biodiversity value. This includes through Policy E2 (Non-Allocated Employment Sites), Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions) and Policy RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside), which allow for employment and recreational development to come forward where no unacceptable harm occurs to the natural environment – which will likely extend to include biodiversity quality and connectivity. Similarly, Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside) seeks to protect biodiversity through development by ensuring proposals will not cause harm to quality or connectivity, but rather enhance biodiversity and the resilience of ecosystems.
- 8.10.9 Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) requires development to, “*Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscapes, biodiversity, public rights of ways and heritage assets*”, through six key functions. This includes “*by protecting, assessing, positively managing and*

*enhancing biodiversity and geological interests, including designated and non-designated sites, protected and priority species and their habitats, and the ecological connectivity between them*". There is also a key function relating to greenspace provision that states that green infrastructure assets and opportunities are designed to deliver a multifunctional resource. This links to Policy GI1 (Green Infrastructure), which seeks to ensure development proposals maintain, protect and enhance the integrity and diversity of the green infrastructure network across Monmouthshire. It also links to Policy GI2 (Trees, Woodland and Hedgerows), which works to protect these features through development, or replace them where removal or damage is necessary. These policies contribute to biodiversity by protecting networks and features, which helps to strengthen the network.

- 8.10.10 Furthermore, some of the wider RLDP policies also include a biodiversity focus. Policy OC1 (New built development in the Open Countryside) puts forward a presumption against new built development in the undeveloped countryside of Monmouthshire, and where proposals are put forward, they will only be permitted where they will have no unacceptable adverse impact on biodiversity. This links to Policy GW1 (Green Wedge Designations), which seeks to protect certain green gaps between settlements. These policies work to protect biodiversity by maintaining the existing network in the open countryside, and reducing the potential for negative impacts to occur where development is permitted. Strategic Policy S3 (Sustainable Placemaking and High Quality Design) puts forward the need for development to incorporate a green infrastructure approach – reiterated through supporting Policy PM1 (Creating well-designed places), which encourages the integration of multifunctional green and blue infrastructure with development. These policies will contribute to maintaining and enhancing biodiversity connectivity through protecting existing features that contribute to the network and adding new features to it. Adverse impacts on biodiversity connectivity are resisted through Policy LC5 (Dark Skies and Lighting).
- 8.10.11 Additionally, Policy NR1 (Nature Recovery and Geodiversity), Policy NR2 (Severn Estuary Recreational Pressure), and Policy NR3 (Protection of Water Sources and the Water Environment) all contribute to maintaining and enhancing biodiversity. This is achieved through protecting designated sites for biodiversity and / or geology and reducing the risk of harm, incorporating mitigation measures where harm cannot be avoided, and delivering benefits for biodiversity and ecosystem resilience.

## **Cumulative effects**

- 8.10.12 Development proposed through the Deposit Plan has the potential to interact with and have cumulative effects on biodiversity with growth proposed in other areas outside the County. This includes development plans in surrounding authorities, such as Torfaen, Newport, Brecon Beacons National Park, and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance biodiversity.
- 8.10.13 HRA work has been carried out to address the likelihood for adverse effects on the integrity of any European designated sites as a result of development

proposed through the RLDP acting in-combination with other plans and projects. The candidate site assessment process has also considered the impacts of development at specific sites on biodiversity to inform RLDP policies.

- 8.10.14 It will be important for Local Planning Authorities and stakeholders, such as NRW and Natural England, to work closely to identify potential cross-boundary issues and seek to protect and enhance ecological corridors that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver biodiversity net gain should be explored.

### Summary of likely effects

- 8.10.15 Considering the above and with nutrient neutrality solutions now in place, **minor positive effects** are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.

## 8.11 Historic environment

- 8.11.1 Through Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy), the majority of growth during the plan period is being directed towards the primary settlements of Abergavenny (including Llanfoist), Caldicot (including the Severnside area), Chepstow, and Monmouth (including Wyesham). There is a range of nationally designated heritage assets located within and around these settlements. Furthermore, the Blaenavon Industrial Landscape World Heritage Site is located to the south west of Abergavenny. The level of development proposed and directed to these settlements under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) has the potential to result in impacts on the designated heritage assets and wider historic environment within and surrounding these settlements. Given the lack of brownfield sites it is likely that growth will broadly be delivered on greenfield sites.
- 8.11.2 The RLDP identifies four large scale sites for development at Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside area), and Monmouth (including Wyesham). All four strategic sites have been considered through the ISA process. Of particular note in relation to the historic environment is strategic growth proposed under Policy HA2 (Land to the East of Caldicot). Part of the site is located within the Caldicot Conservation Area, containing Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. However, it is noted Policy HA2 makes a stipulation for the historic environment – indicating development should consider and respond positively to the setting of the heritage assets and views to the nearby scheduled monument, and that no built development will occur within these sensitive areas. Additionally, the site allocated under Policy HA4 (Land at Leasbrook, Monmouth) is within close proximity to the Dixton Conservation Area – located to the east. Furthermore, the site under Policy HA3 (Land at Mounton Road, Chepstow) is also adjacent to a conservation area – Mathern Conservation Area,

located to the south. In this respect, development is likely to impact the intrinsic qualities, and setting of these heritage assets.

- 8.11.3 There are a number of other policies that support or permit a type of development that could have impacts on the historic environment. This includes Policy CC2 (Renewable Energy Allocation), which supports the construction of ground mounted solar development at a site within Raglan Enterprise Park, and Strategic Policy S6 (Infrastructure), which details the different requirements that will need to come forward to make development acceptable. Furthermore, Strategic Policy S9 (Gypsy and Travellers) and Policy GT1 (Gypsy, Traveller and Showpeople Sites) allocates a site at Bradbury Farm, Crick for seven pitches to meet Gypsy and Traveller accommodation needs and supports proposals for further sites subject to meeting outlined criteria. Furthermore, Strategic Policy S10 (Employment Site Provision) seeks to allocate 57 hectares of employment land to meet a minimum requirement of 38 hectares, at new sites put forward through Policy EA1 (Employment Allocations) and non-allocated sites under Policy E2 (Non-Allocated Employment Sites). This links to Strategic Policy S11 (Rural Economy), which enables rural enterprise uses outside settlement boundaries, and Strategic Policy S12 (Visitor Economy) – which supports development proposals that contribute to the visitor economy and sustainable tourism. Finally, Strategic Policy S15 (Community and Recreation Facilities, Public Open Spaces and Areas of Amenity Importance) seeks to bring forward enhanced community and recreation facilities within or adjoining settlement boundaries – supported by Policy CI2 (Provision of Outdoor Recreation Facilities, Open Space and Allotments / Community Growing Areas). All of these policies could impact upon the historic environment through changes to the setting of heritage features, or changes to views to/ from heritage structures, thus changing how they are interpreted.
- 8.11.4 However, Policy OC1 (New built development in the Open Countryside) contributes to reducing the potential for negative impacts on the historic environment and heritage assets in Monmouthshire by bringing forward a presumption against new built development in the open countryside. This will help to limit development coming forward outside of settlement boundaries, thus helping to protect the integrity of the wider historic landscape. Furthermore, Policy OC1 (New built development in the Open Countryside) indicates proposals for new development in the open countryside will only be permitted where it will have no unacceptable adverse impact on historic, cultural, or geographical heritage. Again, this policy works to protect the historic environment of Monmouthshire by ensuring features and qualities are maintained and protected.
- 8.11.5 The RLDP includes policies that will help to reduce the impact of proposed development on the historic environment. This includes Strategic Policy S3 (Sustainable Placemaking & High Quality Design) which requires development to “*contribute to creating high quality, attractive and sustainable places that support the health and well-being of the community*”. To achieve this development should, “*protect and enhance the natural, historic and built environments and show an understanding of how these function together to contribute towards the quality of places*”.

- 8.11.6 This is supported by Policy PM1 (Creating well-designed places), which indicates development proposals will need to meet a number of criteria. This includes respecting the existing development design (including form, materials, and layout), contributing to a sense of place, and respecting and enhancing local distinctiveness – particularly where historical features are present. This will help ensure new development is reflective of and positively contributes towards the existing built environment. It is also supported by Policy PM2 (Environmental Amenity), which indicates development that would cause significant harm to built heritage through increased pollution (for example, air and light) will not be permitted unless measures are incorporated to overcome potential risks. Furthermore, Strategic Policy S3 is supported by Policy HE1 (Conservation Areas) and Policy HE2 (Design of Shop Fronts in Conservation Areas) which seeks to preserve and enhance the character and appearance of Conservation Areas and their settings through new development. This links to Policy PM3 (Advertisements), which stipulates advertisements in Conservation Areas will be permitted where they would not detract from the character or appearance of the area. It is also supported by Policy HE3 (Roman Town of Caerwent), which ensures development protects the integrity of archaeological remains and the character of the associated Conservation Area. As such, these policies positively contribute to the protection of heritage features and the wider historic environment through seeking reflective and considerate development.
- 8.11.7 Furthermore, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) states that development proposals must, *“Maintain, protect and enhance the integrity and connectivity of Monmouthshire’s green infrastructure, landscape, biodiversity, public rights of ways and heritage assets”* through *“Landscape Setting and Quality of Place, by identifying, protecting and, where appropriate, enhancing the distinctive landscape and historical, cultural, ecological and geological heritage, including natural and man-made elements associated with existing landscape character”*. This will contribute to a maintained wider historic landscape. This policy is supported by Policy GI1 (Green Infrastructure) and Policy GI2 (Trees, Woodland and Hedgerows), which seek to maintain and enhance green features (including those that are of cultural heritage), which will safeguard and contribute additional features that influence the setting of historic features. As such, the green infrastructure policies work well to maintain heritage features and enhance the historic environment in Monmouthshire.
- 8.11.8 Policy LC1 (Landscape Character) also supports Strategic Policy S5 through ensuring development does not have an unacceptable adverse effect on the historic character or quality of Monmouthshire’s landscape – including changes to the character of the built landscape. The heritage importance of Blaenavon Industrial Landscape World Heritage Site is protected through Policy LC2 (Blaenavon Industrial Landscape World Heritage Site), which works to protect the setting and character of the designation, as well as significant views into and out of the area. Heritage considerations are also included in Policy LC3 (Bannau Brycheiniog National Park), which protects the setting of the designation and significant views and Policy LC4 (Wye Valley National Landscape (AONB)), which stipulates development will need to be in harmony with the built heritage of the designated area. These work to maintain the character of the historic environment in Monmouthshire.

- 8.11.9 It is recognised that some of the policies that support or permit development have specific heritage stipulations. This includes Policy IN1 (Telecommunication, broadband and other digital infrastructure), which indicates these types of development proposals will be considered and permitted where they would not bring forward significant adverse impacts to the historic environment or built heritage. Strategic Policy S10 (Employment Site Provision), which requires all proposals to be subjected to detailed planning considerations – including the protection of the built environment. This will likely extend to the historic environment as demonstrated by supporting Policy E2 (Non-Allocated Employment Sites), which indicates proposals for industrial and business development will be supported where proposals would not cause harm to historical or cultural heritage. Similarly, Strategic Policy S11 (Rural Economy) indicates development to enable rural enterprise will need to not cause unacceptable harm to surrounding historic and cultural heritage. This is reflected in supporting Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions), which indicates small-scale industrial and business development will be supported where it would not cause unacceptable harm to the built environment – which will likely extend to include heritage features. Furthermore, under Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside), any sustainable tourism proposals in the open countryside will need to protect, maintain, and enhance the historic environment. Additionally, Policy CC3 (Renewable Energy Generation) indicates renewable and low carbon development proposals will be permitted where there is no unacceptable impact upon historic features. These policies work to support the historic environment by ensuring heritage assets and their settings are not harmed through development.
- 8.11.10 The future well-being of the Welsh language the RLDP is dependent on a range of factors beyond the planning system, particularly education, demographic change, community activities, and a sound economic base to maintain thriving sustainable communities. The RLDP will deliver new homes and employment opportunities as well as associated infrastructure improvements. As most growth is directed to the principal settlement areas, effectively integrated new housing and employment development can support cultural vitality and inclusive communities. This is likely to have a long term indirect positive effect on the future of the Welsh language; however, this is unlikely to be significant.

### **Cumulative effects**

- 8.11.11 Development proposed through the Deposit Plan has the potential to interact with development proposed through other plans to have a cumulative effect on the historic environment. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Blaenavon Industrial Landscape World Heritage Site (WHS), as well as historic town centres.
- 8.11.12 The WHS lies across the County Boundary and also forms part of the County Borough of Torfaen. The south-western boundary of the WHS runs parallel with the boundary of Torfaen/ Blaenau Gwent County Borough's also. Growth proposed through the RLDP alongside growth proposed through the emerging spatial strategies for the Torfaen and Blaenau Gwent



LDPs has the potential to cumulatively affect the sensitive historic site and its setting. It is recognised however, that all of the Local Development Plans will include policies which seek to protect and enhance the historic environment.

- 8.11.13 The WHS Management Plan seeks to “*deliver well-being benefits through heritage management and heritage-led regeneration*”. The document identifies that Blaenavon has enjoyed successful heritage-led urban and environmental regeneration which has benefitted the historic landscape delivering substantial improvements and promoting continued inward investment. In this respect, growth around the WHS has the potential to support regeneration and townscape improvements that continue to protect and enhance the designated area and the wider setting.
- 8.11.14 It will be important for Local Planning Authorities and stakeholders, such as Cadw, to work closely to identify potential cross-boundary issues and seek to protect and enhance heritage settings that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver heritage-led regeneration, in line with the WHS Management Plan, should be explored.

## Summary of likely effects

- 8.11.15 At this time, **minor negative effects** are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.

## 8.12 Landscape

- 8.12.1 Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County includes:
- Wye Valley National Landscape (previously Area of Outstanding Natural Beauty, or AONB) located to the east of Monmouthshire. The part of the Wye Valley National landscape located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.
  - Brecon Beacons National Park located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.
- 8.12.2 In line with Planning Policy Wales (2024) it is recognised that the Wye Valley National Landscape and Brecon Beacons National Park are “*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced*”. In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the aim to “*Ensure all development within*



*the AONB and its setting conserves and enhances the AONB*<sup>27</sup>. Notably, Objective WV-D2 seeks to “*encourage and support high standards of design, materials, energy efficiency, drainage, landscaping, and Green Infrastructure in all developments*”.

- 8.12.3 In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development control functions in the correlating part of the County. The LDP “*represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park*”. Additionally, ‘Y Bannau The Future’ The Management Plan for the Brecon Beacons 2023 – 2028 sets out under even cross-cutting themes, policies, and priorities for managing change in the National Park. Notably, ‘Place Planning’ helps to deliver high quality integrated sustainable development within the National Park.
- 8.12.4 While protection is provided at the higher level, it is nonetheless considered that development proposed through the RLDP has the potential to adversely impact upon special landscape features, character, and setting.
- 8.12.5 Strategic Policy S1 (Growth Strategy) states that the LDP will make provision for up to 6,210 homes over the plan period. However, the residual housing requirement during the plan period is less than this once existing commitments have been taking into account.
- 8.12.6 The growth strategy seeks to distribute growth across the County in a manner that reflects the findings of the Sustainable Settlement Appraisal. This is demonstrated through Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy). It will focus growth to the primary settlements of Abergavenny (including Llanfoist), Chepstow and Caldicot (including the Severnside area), and Monmouth (including Wyesham), together with a sustainable amount of growth to the most sustainable lower tier settlements, including, a small amount of development in the most sustainable Rural Settlements to bring forward affordable housing. It is noted that the RLDP has a presumption against new built development in the open countryside unless justified under national planning policy (Policy OC1 New Built Development in the Open Countryside). This will likely include the avoidance of new development within designated green wedges that contribute to keeping settlements separate (Policy GW1 Green Wedge Designations), thus contributing to the protection of undeveloped landscapes in Monmouthshire.
- 8.12.7 It is noted that the conversion / rehabilitation of buildings within the open countryside is supported under Policy H4 (Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use) where development is respectful of the landscape. This includes how the structure is designed (for example, the form and materials used), and how it is accessed – especially if located within the Wye Valley National Landscape. Linked to this, the replacement of existing dwellings in the countryside will be permitted as per Policy H5 (Replacement Dwellings in the Open Countryside), so long as the original structure is not important to the visual and intrinsic character of the landscape, and the replacement is designed to be considerate of the setting. Similarly, the extension of rural dwellings in

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<sup>27</sup> Note the Management Plan has not been updated to reflect the change to National Landscape from AONB.

the open countryside should be modest and should respect and enhance the existing structure (Policy H6 Extension of Rural Dwellings). This will help ensure development contributes to the landscape character and quality.

- 8.12.8 Looking specifically at the strategic policies, in accordance with Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) around 1,362 homes, including strategic site allocation Land to the East of Abergavenny (Policy HA1 - which will deliver 500 homes within the plan period), will be directed to Abergavenny. Whilst the settlement is adjacent to the National Park, the strategic site is a distance from the designation – located within the settlement boundary to the east. 829 homes, including the strategic site allocation Policy HA3 (Land at Mounton Road, Chepstow – which will deliver 146 homes) are directed to Chepstow, which is located adjacent to the Wye Valley National Landscape. The site allocation is within proximity to the designated area and as such development could impact upon the setting of the landscape. The same can be said of the strategic site allocation under Policy HA4 (Land at Leasbrook, Monmouth) which seeks to bring forward development within close proximity to the Wye Valley National Landscape.
- 8.12.9 As a result, focussing a significant proportion of development in the Primary Settlements has the potential to increase pressure on landscape character, setting, and the intrinsic qualities of the Wye Valley National Landscape and Brecon Beacons National Park. All strategic site allocations are expected to demonstrate how the proposal has been informed by surrounding landscape character, qualities, and sensitivities, under Strategic Policy S8 (Site Allocation Placemaking Principles).
- 8.12.10 Consideration is also given to the impact of the RLDP on the wider valued landscape; recognising that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 landscapes of outstanding or special historic interest in Wales. Notably there are four located within Monmouthshire. These mainly relate to the National Landscape along the east of the County, along the Severn Estuary to the south, and to the west coinciding with the Brecon Beacons National Park.
- 8.12.11 It is considered that directing a significant proportion of growth towards important designated landscapes will ultimately change the landscape setting of these assets to some degree, with both positive and negative effects anticipated. Negative effects are ultimately anticipated due to a loss of greenfield and agricultural land through strategic development sites at Abergavenny and Chepstow. The delivery of these sites is likely to affect local landscape character, with development at Chepstow also considered likely to affect views from the National Landscape given the rural nature and topography of the County. More broadly, effects are likely to be more significant in relation to Land to the East of Abergavenny (Policy HA1), given the scale of growth proposed and the categorisation of the site as being of ‘a high to medium landscape sensitivity’ in relation to residential development<sup>28</sup>. The same can be said of the site under Policy HA4 (Land at Leasbrook, Monmouth). Land at Mounton Road, Chepstow (Policy HA3) is categorised as being of ‘medium landscape sensitivity’. The site allocated under Policy

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<sup>28</sup> Monmouthshire Landscape Capacity Update 2020

HA2 (Land to the East of Caldicot) is a mix of both 'high to medium landscape sensitivity' and 'medium landscape sensitivity' in relation to residential development.

- 8.12.12 It is considered that potential negative effects and potential positive effects are dependent upon the delivery of high-quality design and efficient layout.
- 8.12.13 To this effect, Strategic Policy S3 (Sustainable Placemaking and High Quality Design) requires that "*development will contribute to creating high quality, attractive and sustainable places that support the well-being of the community*". In particular, this policy is supported by Policy PM1 (Creating well-designed places), which seeks to ensure high-quality sustainable design respects the character and distinctiveness of the built, historic and natural environment of Monmouthshire. This is also supported by Policy PM2 (Environmental Amenity), which indicates development proposals that would cause a significant risk or harm to local character and quality of the countryside and landscape through pollution (for example, noise and light pollution) will not be permitted unless the risk can be overcome through design measures.
- 8.12.14 PPW places the delivery of sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy, and friendly at the heart of the Plan and notes it as the optimal outcome of development plans. Notably, PPW12 defines Green Infrastructure as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*". The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW, recognising the multi-functional role it has in delivering the goals and objectives of the Future Generations and Wellbeing Act.
- 8.12.15 The RLDP supports a green infrastructure led approach to the design of new development that will enhance the character and identity of Monmouthshire's settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. It is however recognised that the achievement of this will depend largely upon identifying and understanding the local characteristics which are distinctive to an area. To ensure this is delivered, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Conservation) requires that development proposals maintain, protect, and enhance the integrity and connectivity of Monmouthshire's green infrastructure, landscapes, biodiversity, public rights of ways and assets through a number of key functions, including greenspace provision and connectivity, sustainable energy use, and landscape setting and quality of place. This policy is supported by several policies concerned with maintaining, protecting and enhancing the green infrastructure network (Policy GI1 Green Infrastructure) and specific green features (Policy GI2 Trees, Woodland and Hedgerows) and the character contribution of dark skies (Policy LC5 Dark Skies and Lighting).
- 8.12.16 Policy LC1 (Landscape Character) is concerned with protecting the landscape character of Monmouthshire and requires landscape assessments to be undertaken for development proposals that would impact upon landscape character. This contributes to ensuring landscape character and quality is maintained. There are several supporting policies that seek to protect important landscape areas, such as the Blaenavon Industrial

Landscape World Heritage Site (Policy LC2), the Bannau Brycheiniog National Park (Policy LC3), and the Wye Valley National Landscape (Policy LC4). These will all contribute positively towards meeting the RLDP objective to “*protect, enhance and manage Monmouthshire’s natural environment. This includes, the Wye Valley National Landscape (AONB), the County’s other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests*”. In this context, in accordance with Strategic Policy S6 (Infrastructure) development may be required to include “*Recreation and Leisure Facilities including formal and informal open space*”, and / or “*Green Infrastructure*” alongside development, to make development acceptable.

- 8.12.17 The wider RLDP policies make provisions for landscape. Strategic Policy S11 (Rural Economy) allows for diversification of the rural economy outside of defined settlement boundaries where it is of a style and type compatible with the surrounding area and will not bring forward unacceptable harm to the landscape. This is supported by Policy RE1 (Secondary and Main Rural Settlements Employment Exceptions) Policy RE2 (The Conversion or Rehabilitation of Buildings in the Open Countryside for Employment Use), and Policy RE6 (Provision of Recreation and Leisure Facilities in the Open Countryside). The same can be said of Strategic Policy S12 (Visitor Economy), which indicates development proposals will be supported where they would not have an adverse impact on the landscape character of key features and areas of tourism interest. This works to protect the landscape by ensuring development integrates well with its surroundings. This policy is supported by Policy T1 (New or Extended Tourism Accommodation and Facilities in the Open Countryside)
- 8.12.18 Policy CC3 (Renewable Energy Generation) also makes provisions for landscape – indicating that renewable and low carbon development will be permitted where there are no unacceptable adverse impacts upon the landscape or its character. This would likely include visual impacts to important views, which is also a key consideration for Policy IN1 (Telecommunication, broadband and other digital infrastructure), which indicates infrastructure will need to minimise impact on the visual amenity and should pay particular care to the National Landscape and National Park designations.
- 8.12.19 Furthermore, sites for Gypsy, Traveller and Travelling Showpeople communities will be permitted where the land does not occupy a prominent location and is in line with RLDP policies for protecting and enhancing the character of the landscape. Under Policy GT1 (Gypsy, Traveller and Showpeople Sites), where sites have the potential to bring forward negative impacts to the landscape, mitigating measures will need to be incorporated to reduce the impacts. This will help to protect the landscape character and important views.
- 8.12.20 In terms of employment sites, Policy E2 (Non-Allocated Employment Sites) indicates proposals for industrial and business development will be supported where the proposed site is within or adjacent to settlement boundaries or existing and proposed employment sites. This will help to reduce potential landscape issues by bringing forward growth in areas that already experience a level of development, which will contribute to reducing

visual impacts. Further to this, Policy E2 also indicates proposals would need to cause no harm to surrounding landscape value – further protecting landscape character and quality.

## Cumulative effects

- 8.12.21 Development proposed through the Deposit Plan has the potential to interact with and have cumulative effects on landscape with growth proposed in other areas outside the County. This includes development plans in surrounding authorities, such as Torfaen, Newport, Brecon Beacons National Park, Forest of Dean and Herefordshire, and development plans in wider South East Wales and South West England. All of the Local Development Plans include policies which seek to protect and enhance the landscape.
- 8.12.22 Development proposed through the RLDP has the potential to interact with development proposed through these other plans to have a cumulative effect on the landscape. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Wye Valley National Landscape (AONB) and Brecon Beacons National Park, given their importance nationally.
- 8.12.23 When considering cumulative effects of development on the National Landscape, consideration should be given to the protections provided by the adopted Wye Valley AONB Management Plan (2021). In addition to national policy requirements, the AONB Management Plan sets out Strategic Development Objectives, which aim to *“Ensure all development within the AONB and its setting conserves and enhances the AONB”*.
- 8.12.24 In terms of the National Park, consideration should be given to the protections provided by the BBNP Management Plan (2021). In addition to national policy requirements, the Management Plan sets out under numerous themes, policies, and priorities for managing change in the National Park. Notably, ‘Place Planning’, helps to deliver high quality integrated sustainable development within the National Park.
- 8.12.25 Ultimately the nature and significance of effects will be dependent on the design / layout of development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural Resources Wales / Natural England and the Wye Valley AONB Partnership, to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

## Summary of likely effects

- 8.12.26 At this time, **minor negative effects** are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision

and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.

## 8.13 Climate change (including flood risk)

- 8.13.1 The Climate Change ISA objectives are to both mitigate and adapt to the effects of climate change through increasing energy efficiency and using low carbon and renewable energy sources where possible. Adapting to the effects of climate change includes the need to adapt to increased flood risk, whilst a key focus of mitigating climate change is the need to reduce CO<sub>2</sub> emissions from the built environment.
- 8.13.2 The distribution of growth proposed under Strategic Policy S1 (Growth Strategy) and Strategic Policy S2 (Spatial Distribution of Development – Settlement Hierarchy) has potential to perform either positively or negatively in relation to climate change adaptation as the strategy is not supported by a bottom-up understanding of specific sites. However, there is a broad understanding of the direction of growth, including four strategic sites directed to the main settlements of Abergavenny (including Llanfoist), Chepstow, Caldicot (including Severnside), and Monmouth (including Wyesham). Nonetheless, this means that detailed conclusions are challenging as flood risk varies within settlements. For example, the growth directs a significant proportion of growth to Abergavenny – and the settlement has substantial areas of Flood Zone C2, i.e., the area at greatest risk of fluvial flooding. However, it is recognised that the strategic site allocation under Policy HA1 (Land to the East of Abergavenny) is outside of the areas of C2 fluvial flood risk. Furthermore, higher tier policy is likely to ensure that areas of high flood risk are avoided through the development process. This is reiterated by MCC.
- 8.13.3 In terms of the other strategic site allocations, the site under Policy HA3 (Land at Mounton Road, Chepstow) is not constrained by flood risk. There is however an isolated area in the north half of the site at high risk of flooding from surface water. It is recognised that the site has potential to support adaptation to the potential effects of climate change by utilising sustainable drainage systems (SuDS) and providing improvements to the local green infrastructure network. Development is also likely to be directed away from these areas of high flood risk in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.
- 8.13.4 The Land to the East of Caldicot (Policy HA2) is constrained by fluvial flood risk along its western boundary. As above, it is considered that the design and layout of development alongside the use of suitable mitigation methods will minimise the potential residual effects, in line with higher level planning policy – especially given the policy indicates no built development will be permitted within the part of the site that is within the floodplain.
- 8.13.5 Much of Monmouth is also at risk of flooding, linked to the River Wye and River Monnow flowing through the settlement. Whilst areas of the settlement are within areas of C1 and C2 flood risk, the strategic site under Policy HA4 (Land at Leasbrook, Monmouth) is largely removed from this higher risk. There is a small area of the site in the southern extent that is within zone C2 – though it is anticipated this risk could be avoided or mitigated through development by focusing growth elsewhere in the site or incorporating flood



management techniques (like SuDS). Furthermore, the policy also includes the requirement for emergency vehicular access to be provided to connect the site to the A466 to allow for greater access in the case of an extreme flooding event. This contributes well to mitigating the flood risk on the site.

- 8.13.6 In terms of climate change mitigation, the growth strategy has a mixed performance. Notably, there is the potential to reduce greenhouse gas emissions by focusing growth at the higher tier settlements with existing transport links. By directing of the majority of growth to Tier 1 settlements, including through the allocation of strategic sites, the strategy ensures that new development will be at locations with the strongest public transport links to other regional employment hubs, particularly Cardiff, Newport, Bristol and the Wider SW Region. Similarly, new employment growth in the Tier 1 settlements will be accessible by train.
- 8.13.7 In terms of the strategic site allocations, it is considered that larger sites will be supported by a level of transport infrastructure / active travel improvements. This is likely to support self-containment, reducing the need to travel and in turn contributing positively towards climate change mitigation objectives. While there is uncertainty at this stage in terms of the specific infrastructure to be provided, positive effects of greatest significance are considered in relation to Policy HA2 (Land to the East of Caldicot), given the level of growth proposed, followed by Policy HA1 (Land to the East of Abergavenny).
- 8.13.8 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Monmouthshire's Active Travel Network includes walking and cycling paths within each of the principal settlements though inter-settlement connectivity is limited outside of the Severnside settlements (which are close enough for active travel to be a viable option, though this may be partly on-road). In this context new development through the growth strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within settlements. However, the rural nature of the County and the distances between most of the higher tier settlements mean that growth is unlikely to have a positive effect in terms of climate change mitigation in relation to the majority of inter-settlement travel.
- 8.13.9 The trend of increased home and remote working in light of the COVID-19 pandemic is anticipated to continue over the longer term. In accordance with Welsh Government's ambition of 30% of people working from or near home, the RLDP supports new development where it meets infrastructure requirements, including broadband provision. This, amongst other requirements, will contribute positively towards reducing out-commuting and supporting the Council's climate change objectives by reducing the overall need to travel.
- 8.13.10 In 2018 the proportion of CO<sub>2</sub> emissions in Monmouthshire from the built environment, i.e., from both domestic and industrial / commercial sources, was 50% which is notably low in relation to the Wales average of 74%. However, this is likely to simply reflect that the County has a higher-than-average proportion of emissions from transport sources, rather than reflecting low built environment emissions per se. While it is considered that the growth strategy is delivering relatively low growth in absolute terms,

strategic growth proposed at strategic site allocation under Policy HA2 (Land to the East of Caldicot) is considered of scale to facilitate opportunities for delivering decentralised heat / power generation from renewable or low carbon sources.

- 8.13.11 More broadly it is considered unlikely that the distribution of growth will appreciably reduce emissions from the built environment.
- 8.13.12 Strategic Policy S4 (Climate Change) could lead to positive effects in relation to climate change adaptation and climate change mitigation. The policy has a strong emphasis on the need to embed low carbon concepts into development, saying that all development proposals will be required to incorporate *“low / zero carbon energy requirements by reducing energy demand and promoting energy efficiency”*, utilise *“sustainable construction techniques and local supplies through the adoption of circular economy techniques”* and provide *“ultra-low emission vehicle charging infrastructure to reduce emissions”*. The policy also requires all development to avoid *“areas at risk of flooding”* and to incorporate *“measures such as Sustainable Urban Drainage Systems and flood resilient design”*.
- 8.13.13 Strategic Policy S4 is supplemented by four additional policies related to the Climate Change theme. These policies set out standards for all new build residential development to follow to ensure houses are built to the highest energy efficiency standards (Policy NZ1 Monmouthshire Zero Carbon Homes), and incorporate sustainable urban drainage systems where appropriate (Policy CC1 Sustainable Drainage Systems). The policies also identify a renewable energy opportunity at Raglan Enterprise Park for ground mounted solar development (Policy CC2 Renewable Energy Allocation), and further renewable and low carbon development which contribute to national and local targets are supported through Policy CC3 Renewable Energy Generation. As such, they perform positively, compliment Strategic Policy S4 (Climate Change), and contribute well to climate change mitigation and adaptation.
- 8.13.14 It is considered that wider policies will also contribute to climate change adaptation and mitigation effects. For example, Strategic Policy S5 (Green Infrastructure, Landscape and Nature Recovery) and its supporting policies G11 (Green Infrastructure) and G12 (Trees, Woodland and Hedgerows) work to maintain, protect and enhance green infrastructure in Monmouthshire. Protecting green features will maintain contributions to carbon capture and storage, and maintain natural flood risk contributions (linked to water interception). Furthermore, Strategic Policy S13 (Sustainable Transport) and its supporting policies (in particular Policy ST1 Sustainable Transport Proposals, as well as Policy PROW1 Public Rights of Way) will help contribute to climate change mitigation through reducing emissions linked to transportation. This will be achieved through promoting and prioritising active travel and public transport over private vehicular transport, thus reducing the number of vehicles on the road.
- 8.13.15 Additionally, Strategic Policy S3 (Sustainable Placemaking and High Quality Design) will contribute to climate change adaptation and mitigation. This is due to its focus on incorporating a green infrastructure-led approach and minimising the need to travel, and promoting sustainable transportation. This will reduce the number of vehicles on the road, and increase carbon



capture and storage levels. Policy GT1 (Gypsy, Traveller and Showpeople Sites) outlines the need for accommodation sites to be removed from areas at high risk of flooding – thus reducing the potential for flood impacts on structures. Finally, the identification of new employment sites under Policy EA1 (Employment Allocations), and the protection of existing sites under Policy EA2 (Protected Employment Sites) will likely reduce the need to travel out of settlements to access work opportunities, which will contribute to reducing emissions linked to transportation.

## Cumulative effects

- 8.13.16 In terms of climate change adaptation there does not appear to be notable potential for negative cumulative effects from development in Monmouthshire in combination with development in neighbouring plan areas. Although significant areas of fluvial flood risk permeate the County, in alignment with the major watercourses which flow to the Severn estuary to the south, there is a presumption in PPW against development in Flood Zone C2, the highest risk zone. This is augmented by the revised draft Technical Advice Note 15 (TAN15) which emphasises that *“In Zone 3 (Rivers and Sea), allocations for residential and other highly vulnerable development must not be made as the risks and consequences of flooding are not considered acceptable for these types of development.”* This will help ensure that development in Monmouthshire will be part of a regional and national picture of development which is directed away from areas at high risk. In this sense effects from the Deposit Plan in combination with surrounding authorities are likely to be neutral.
- 8.13.17 Additionally, the PPW presumption against such development is likely to ensure that development upstream from Monmouthshire in neighbouring authorities will be directed away from high-risk areas, thereby minimising interference in the natural flow of watercourses through the County. The Deposit Plan does not direct development to locations which could have impacts further downstream in neighbouring plan areas. For example, in the context of PPW and TAN15 development at Usk will be unlikely to be of a scale or at sites which could impact the River Usk downstream as it flows through Newport.
- 8.13.18 In terms of climate change mitigation there is greater potential for cumulative effects. As noted in the discussions of air quality and of transport, positive effects are anticipated from proposed expansion of the SE Metro throughout the Cardiff Capital Region, including in Monmouthshire. This includes enhanced rail connectivity between Cardiff and Abergavenny and Chepstow, and bus rapid transit between Cardiff and Monmouth. This will likely contribute to a modal shift away from high emitting transport modes towards sustainable travel. However, regional growth along major road arteries, such as growth in Newport along the M4 corridor and growth in Blaenau Gwent along the A465 corridor, could introduce additional road users as well.
- 8.13.19 The Cardiff Capital Region City Deal states an ambition for the ten authorities in the Cardiff Capital Region to come together to deliver strategic solutions for the region, including in relation to renewable energy. The City Deal identifies that regional development will present opportunities to deliver *“renewable energy-led regeneration and housing programmes”*. In this

context there is theoretical potential for positive in-combination effects, particularly as larger-scale development can give rise to opportunities to minimise per capita emissions from the built environment over-and-above a strategy involving dispersal of housing growth across smaller sites. It is recognised that development proposed through the adopted plans of the Brecon Beacons National Park, Forest of Dean, and Herefordshire could demonstrate particular locational/ site specific opportunities in respect of minimising per capita built environment and transport emissions.

8.13.20 There could also be potential to explore strategic low-carbon opportunities from development in the south of Monmouthshire in combination with the strategic Eastern Expansion Area in Newport.

### Summary of likely effects

8.13.21 At this time, **neutral effects** are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire.

8.13.22 In terms of climate change mitigation, **minor negative effects** are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.

## 9. Conclusions and Recommendations

- 9.1.1 The overall conclusions for each ISA theme are presented in this Chapter. At this later stage of plan-making no recommendations are identified, recognising that earlier iterations of the ISA have informed plan development.

ISA theme	Conclusion
<b>Economy and employment</b>	Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to <b>significant positive effects</b> for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.
<b>Population and communities</b>	Considering the above, it is anticipated that implementation of the RLDP will likely lead to <b>significant positive effects</b> . This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.
<b>Health and wellbeing</b>	Overall, it is considered that the RLDP will have <b>significant positive effects</b> on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.
<b>Equalities, diversity, and social inclusion</b>	Considering the above, it is anticipated that <b>significant positive effects</b> will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements.

ISA theme	Conclusion
<b>Transport and movement</b>	<p>Considering the above, <b>significant positive effects</b> are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure.</p> <p>Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.</p>
<b>Natural resources (air, land, minerals and water)</b>	<p>In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, <b>significant negative effects</b> are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.</p>
<b>Biodiversity and geodiversity</b>	<p>Considering the above and with nutrient neutrality solutions now in place, <b>minor positive effects</b> are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.</p>
<b>Historic environment</b>	<p>At this time, <b>minor negative effects</b> are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.</p>

ISA theme	Conclusion
<b>Landscape</b>	<p>At this time, <b>minor negative effects</b> are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.</p>
<b>Climate change (including flood risk)</b>	<p>At this time, <b>neutral effects</b> are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire.</p> <p>In terms of climate change mitigation, <b>minor negative effects</b> are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.</p>

# 10. Next Steps and Monitoring

## 10.1 Next steps

10.1.1 This ISA Report will accompany the Deposit Plan for public consultation. Any comments received will be reviewed and considered as part of the iterative plan-making and ISA process and inform the submission RLDP.

## 10.2 Monitoring

10.2.1 Table 10.1 table below outlines the proposed monitoring for the RLDP. This will be refined in the ISA Adoption Statement.

**Table 10.1: Proposed ISA monitoring programme for the RLDP**

ISA theme	Proposed monitoring measure
Economy and employment	<ul style="list-style-type: none"> <li>• Overall employment and unemployment rate.</li> <li>• Net additional employment floorspace.</li> <li>• Net additional floorspace of commercial development by location.</li> <li>• Net improved quality employment floorspace.</li> <li>• Annual tourism income.</li> <li>• Net additional tourism development by location and type.</li> </ul>
Population and communities	<ul style="list-style-type: none"> <li>• Five-year housing land supply.</li> <li>• Number of pitches for travellers and travelling showpeople provided.</li> <li>• Regular updates to the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.</li> <li>• Number of affordable homes completed in the reporting year.</li> <li>• Number of homes completed by type and bedroom size in the reporting year.</li> <li>• Number of homes completed providing specialist accommodation in the reporting year.</li> <li>• Number of self-build/ custom build homes completed in the reporting year.</li> </ul>
Health and wellbeing	<ul style="list-style-type: none"> <li>• Area of new accessible natural spaces provided through development proposals.</li> <li>• Areas of improved access to natural green spaces provided through development proposals.</li> <li>• New active travel connections by location.</li> <li>• Loss/ gain of public open space by type. For example, park, children's playground, allotments.</li> </ul>
Equalities, diversity, and social inclusion	<ul style="list-style-type: none"> <li>• Indices of multiple deprivation scorings.</li> </ul>

ISA theme	Proposed monitoring measure
Transport and movement	<ul style="list-style-type: none"> <li>• Road junction improvements.</li> <li>• Improvements in accessibility scoring by location for walking and cycling.</li> <li>• Improvement in public transport networks.</li> <li>• Transport Plans agreed by location and land use type.</li> <li>• Additional kilometres of Public Rights of Way.</li> </ul>
Natural resources (air, land, minerals, and water)	<ul style="list-style-type: none"> <li>• Continued air quality monitoring data at air quality monitoring locations.</li> <li>• AQMA revocations.</li> <li>• Area of contaminated land remediated in reporting year.</li> <li>• Number and location of schemes implemented with sustainable drainage serving existing as well as new development.</li> <li>• Number and location of development including watercourse re-naturalisation or flood storage areas.</li> <li>• Number and location of development schemes affecting mineral safeguarding areas.</li> <li>• Area and location of brownfield redevelopment in the reporting year.</li> <li>• Loss of agricultural land by grade.</li> <li>• Area of greenfield development in the reporting year.</li> <li>• Number and location of developments contributing to maintenance of water infrastructure.</li> <li>• Number and location of non-domestic schemes achieving a reduction in water usage over the baseline.</li> </ul>
Biodiversity and geodiversity	<ul style="list-style-type: none"> <li>• Action Plan targets that monitor and manage the impacts of growth on internationally designated sites (SACs/ SPAs/ Ramsar)</li> <li>• Net gains/ losses of buffer land and alternative green space by function that reduce pressures of growth designated sites.</li> <li>• Net gain/ loss of habitat arising from development proposals.</li> <li>• New linkages between habitats by location.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Number, type, and location of approved development impacting on a heritage asset.</li> <li>• Number of heritage assets improved and raised out of the 'at risk' category.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Positive landscape impact assessments on proposals approved.</li> </ul>



ISA theme	Proposed monitoring measure
Climate change (including flood risk)	<ul style="list-style-type: none"><li data-bbox="592 230 1378 306">• Negative landscape impact assessments on proposals refused.</li><li data-bbox="592 322 1378 398">• New developments containing electric vehicle charging points by land use type.</li><li data-bbox="592 405 1378 481">• Number, location, and type of proposals achieving low carbon design.</li><li data-bbox="592 488 1378 564">• Number of decentralised low carbon and renewable energy schemes approved in development.</li><li data-bbox="592 571 1378 647">• Approvals of development in Flood Risk Zones 2, 3a, and 3b by use class and flood risk compatibility.</li><li data-bbox="592 654 1378 725">• Refusals of development in Flood Risk Zones 2, 3a, and 3b.</li></ul>

# Appendix A – Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the ISA Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** provides a checklist of where and how the requirements have been met in this report.

**Table A: Questions answered by the ISA Report, in accordance with an interpretation of regulatory requirements**

Report section	Questions answered	Regulatory requirement met
<b>Introduction</b>	What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.</li> </ul>
	What is the scope of the ISA?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.</li> </ul>
<b>Part 1</b>	What has plan-making/ ISA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach).</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.</li> </ul>
<b>Part 2</b>	What are the ISA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the Plan.</li> <li>The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.</li> </ul>
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged.</li> </ul>

**Table B: Questions answered by the SA Report, in accordance with regulatory requirements**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What's the 'context'?</i>  i.e. answer - <i>What's the 'baseline'?</i>  i.e. answer - <i>What are the key issues &amp; objectives?</i>
3. the environmental characteristics of areas likely to be significantly affected;		
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;		
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;		
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

**Table C: ‘Checklist’ of how (throughout the SA process) and where regulatory requirements are or will be met.**

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 (‘What’s the plan seeking to achieve’) presents this information. The relationship with other plans and programmes is also set out in scoping information (available separately).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2018. The outcome of scoping was an ‘ISA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the ISA’). More detailed messages are reported in the Scoping Report
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2018) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an ‘ISA framework’. The scoping information is presented in the Scoping Report. The context review informed the development of the ISA framework and topics, presented in Chapter 3, which provide a methodological ‘framework’ for appraisal. With regards to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> <li>• Chapter 5 explains how reasonable alternatives were established in-light of available evidence.</li> <li>• Chapter 6 sets out the detailed appraisal of alternative options.</li> <li>• Chapter 7 explains the Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors).</li> <li>• Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.</li> </ul>
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote:	<ul style="list-style-type: none"> <li>• Chapter 5 explains how reasonable alternatives were established in-light of available evidence.</li> <li>• Chapter 6 sets out the detailed appraisal of reasonable alternatives.</li> <li>• Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.</li> </ul>

**Regulatory requirement****Discussion of how the requirement is met**

these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the ISA scope, and the need to consider the potential for various effect characteristics/ dimensions.

7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6 and Appendices B - D) and appraisal of the Plan (Chapters 8 and 9).

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options.

Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

Monitoring measures are set out in Chapter 10.

10. A Non-Technical Summary of the information provided under the above headings.

A Non-Technical Summary (NTS) is provided separately.

The ISA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).

At the current time, this ISA Report is being published alongside the Deposit Plan for public consultation.

The ISA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council will take into account this Interim SA Report when preparing the submission version of the Local Plan for examination.



## Appendix B – ISA of level of growth options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the level of growth options. The level of growth options are detailed in Table AB.1.

### Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.

**Table AB.1: Level of growth options**

<b>Growth option</b>	<b>Type of scenario</b>	<b>Population change 2018-2033</b>	<b>Population change %</b>	<b>Average net migration per annum</b>	<b>Household change 2018-2033</b>	<b>Household change %</b>	<b>Dwellings per annum</b>	<b>Dwellings 2018-2033</b>	<b>Jobs per annum</b>	<b>Jobs 2018-2033</b>
<b>Existing Preferred Strategy growth</b> <i>Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R), AH)</i>	Demographic	12,443	13.2%	1,216	7,255	18.1%	507	7,605	481	7,215
<b>Demographic led strategy for the LPA area</b> <i>Population-led (with added policy assumptions) (PG Long Term (adjusted) (5yr) (MR, CR_R)</i>	Demographic	9,480	+10.9%	930	5,160	+14%	360	5,400	416	6,240

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<b>WG prescribed growth</b>										
<b><i>Dwelling-led</i></b>										
<i>(WG prescribed 285 dpa)</i>	Dwelling	8,050	+9.3%	830	3,900	+10.6%	285	4,280	286	4,290



## Economy and employment

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>

Option 1 seeks to deliver a higher economic growth level than Options 2 and 3 and as a result, is expected to be best performing in relation to this ISA theme. The housing growth proposed alongside economic development also seeks to address potential demographic imbalances with growth in key working age groups. Option 1 is likely to support the retention of younger age groups and reduce out-commuting through growth with high levels of sustainable local access. Option 1 is also predicted to provide opportunities to encourage a more diverse and vibrant economy; notably providing opportunities associated with the Cardiff Capital Region City Deal, the SE Wales Metro, and the removal of the Severn Bridge toll. Considering these benefits to local economy and employment, significant long-term positive effects are anticipated under Option 1.

Option 2 would result in a growth in jobs of 416 pa, which would encourage greater indigenous business growth and encourage inward investment. This would contribute positively towards creating a thriving, well-connected, diverse economy and would assist in building sustainable and resilient communities.

Option 3 represents jobs growth at a lower rate than past delivery rates, and the demographic projections indicate a declining workforce (although there is some growth in the 30-44 age groups), as well as a declining customer base, under this option. The employment growth proposed eventually 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. As a result, negative effects are considered likely, with Option 3 therefore worst performing in this respect.

To summarise, there is an assumption that the higher the level of economic and housing growth, the greater the potential significance of positive effects. Option 1 therefore is considered likely to lead to positive effects of greatest significance, supporting a well-connected diverse economy, and is ranked highest. Significant positive effects are also predicted in relation to growth Option 2 as while the level of economic and housing growth is lower than Option 1, there remains net positive job creation and dwellings per annum. However, effects are likely to be negative under Option 3 given the overall decline in working age population in the county, and the option is ranked least favourably.

## Population and communities

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>

The latest Monmouthshire Annual Monitoring Report of the Adopted LDP (2022-2023) shows that the annual level of housing completions monitored against the Average Annual Requirement (AAR) is no longer recorded, given the 10 year housing requirement of 4,500 units was reached in March 2021. However, it does show that the total cumulative completions monitored against the cumulative requirement (Cumulative AAR) is underdelivering. As such, it is considered that options 1 and 2 would perform positively in terms of contributing towards meeting and sustaining sufficient land supply for the forthcoming Plan period, supporting the future vitality of communities. Option 3 however would deliver limited residential allocations, performing least positively in this respect.

Options 1 to 3 deliver gradually decreasing levels of growth, and it is assumed that as the level of growth increases, so does the ability to address historic under-delivery, and deliver a greater range/ mix of new homes to help meet the needs of all residents in the County, including affordable housing. Higher levels of growth also increase the potential for accessibility improvements and other community benefits associated with development, including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm. Option 1 therefore performs most positively in this respect, followed by Option 2.

The delivery of community benefits will be particularly important in addressing potential future demographic imbalances, and modelling suggests that natural balances are more likely to be achieved with the growth levels proposed under Option 1. Under this higher growth option, growth in younger age brackets, particularly those of working age, balance out the effects of an ageing population, and new development provides the opportunity to address the changing needs of residents in this respect.

While high growth proposed through Option 1 presents the potential to deliver a greater level of infrastructure improvements, the option, given the scale of growth in the context of the County, may also place increased demands on existing infrastructure. Notably, in terms of education, Option 1 would likely result in a significant growth in the number of school aged children, placing more pressure on the capacity of existing schools. However, the level of housing delivery would provide a substantial opportunity to secure additional provision through planning gain to fund extensions and/ or new schools. Conversely, lower growth proposed through Option 3 would likely lead to an unbalanced demographic, and likely see falling school numbers which could in turn result in the closure of schools. Finally, in terms of

Option 2, it is recognised that while the level of growth from younger age groups is at a low level, a more balanced demography has the potential to secure a level of new infrastructure and support balanced communities.

Taking the above into account it is considered that as the level of growth increases so does the likelihood for positive effects of significance. Option 1 would provide a greater range of new homes to meet the predicted increased population and affordable housing needs and is therefore more likely to have a residual significant effect when considered against Options 2 and 3. Option 1 is ranked most favourably accordingly, however, it is noted with Option 1 that there is a need to manage the impacts of growth on local infrastructure capacity so that it does not place unnecessary burdens on existing infrastructure. Option 2 also has the potential to reduce burdens in this respect, but notably will deliver less growth than Option 1 leading to positive effects of less significance. Option 3 is the worst performing as would lead to an unbalanced demographic with limited opportunities to build sustainable communities and support the County's younger population. Any effects are therefore likely to be minor in nature.

## Health and wellbeing

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>

At the time of the 2021 Census, 46.4% of Monmouthshire residents felt that they were in 'very good health' (Wales 46.2%), whilst 4.4% felt that they were in 'bad health' (Wales 5.3%). This reflects the 2021/2022 data on lifestyle and behavioural choices for adults in Wales, which shows that Monmouthshire has a lower proportion of smokers, e-cigarette users, and those who are overweight and/ or obese.<sup>29</sup> However, Monmouthshire has a higher percentage (23%) of those who consume more than 14 units of alcohol on a weekly basis, which was higher by 7% than in the Aneurin Bevan Health Board area and Wales.<sup>30</sup> The 2019 WIMD health domain further highlights deprivation relating to the lack of good health. In Monmouthshire, there are 20 LSOAs in the 50% most deprived, 5 LSOAs in the 30% most deprived, and 2 LSOAs in the 20% most deprived.

In terms of access to the countryside, green/ open spaces, it could be suggested that as the level of growth increases so does the potential for accessibility to be reduced in this respect; for example where countryside is lost at settlement edges. However, this is dependent on the

<sup>29</sup> StatsWales (2022) Adult lifestyles by local authority and health board [online] available at: <https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021>

<sup>30</sup> Ibid

exact location of development and therefore effects are uncertain under all options at this stage. Furthermore, the higher level of growth under Option 1 could increase pressure on existing health services; and it is recognised that Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny. Despite this, there are certain health benefits associated with growth and development. This includes the potential for new or improved community services and facilities supporting growth in the County, including healthcare, public spaces, green infrastructure and retail and leisure. Further, development which delivers transport and infrastructure upgrades, including active travel upgrades, can improve accessibility and safety for residents. The importance of improved connectivity and accessibility to local facilities and open space, in light of the recent pandemic, highlights the potential for higher growth under Option 1, and to a lesser extent Option 2, to support more positive health outcomes than Option 3. However, there is also a need to manage the impacts of growth on local infrastructure capacity to ensure that no unnecessary burdens are placed on existing infrastructure. Option 1 followed by Option 2 will likely ensure communities are balanced, healthy, and socially sustainable, with the potential for significant long term positive effects.

Lower growth proposed through Option 3 could negatively impact on communities and exacerbate negative health implications 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. While negative effects are unlikely to be significant under Option 3, Option 3 nonetheless performs least favourably of all options.

## Equalities, diversity, and social inclusion

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>No</b>

At this stage the location of growth is not known, as a result it is difficult to determine how specific communities and protected characteristics are likely to be affected by the Options. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County; however, again this would be dependent on the preferred spatial strategy.

Whilst lower growth could be argued to help protect the identity of existing communities, Option 3 has the potential to impact negatively on the age profile of the County leading to an unbalanced demographic, with the continuation of an ageing population over the Plan period. Under Option 3 there will be limited opportunities for the younger population to live and work in the County, through providing limited opportunities for job creation or improvements to existing services and facilities. This is likely to exacerbate inequality, in particular, the effects of rural isolation which will negatively impact groups with protected characteristics, such as the young, elderly and disabled, who tend to be disproportionately affected by accessibility issues. 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 further increase deprivation issues, the significance of which has been particularly highlighted through the recent pandemic. As a result, Option 3 is predicted to lead to negative effects, though these effects are unlikely to be significant, the option is judged to perform least favourably of all options.

Higher growth under Option 1 would likely result in a more balanced demographic with an increase in the number of older and elderly people living in the County balanced against an increase in the younger age groups. Option 2 would also provide a more balanced demographic however it should be recognised there is some decline in the 20-29 age group. New development through Option 2 could provide opportunities to support the rural economy and address rural isolation and social inequality, but positive effects are likely to be greater in this respect through Option 1. Both Options 1 and 2 present opportunities to improve accessibility and reduce inequalities through an appropriate spatial strategy, delivering sustainable local communities.

Taking the above into account, both Options 1 and 2 have the potential to lead to significant positive effects through the delivery of new homes, jobs and community infrastructure that strategically improves accessibility and connectivity within the County. It is however recognised that Option 1 could enhance the significance of these effects through planning for more homes, and therefore Option 1 ranks highest overall.

## Transport and movement

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

At this stage, there is no evidence to suggest that the levels of growth proposed under any of the options would have a significant negative effect on the highway network. Whilst all options propose a level of growth that could lead to negative effects in terms of congestion, negative effects are not considered likely to be significant. Further, in light of the recent pandemic, it is likely that higher levels of homeworking will also prevail as a longer-term trend. Higher growth Option 1, followed by Option 2, further provide greater critical mass to enable more significant infrastructure improvements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition, such as expansion of the EV network, smart technologies, last mile deliveries and active travel networks including cycle route connectivity. Conversely, lack of employment opportunities and low housing growth levels under Option 3 would likely result in limited opportunities to enhance transport infrastructure, accessibility, active travel, and the use of sustainable transport options.

The nature and significance of the effects will ultimately be dependent on where the development is located as well as the infrastructure improvements that could be provided. If the additional residential development is located close to the main settlements, taking advantage of the services/ facilities and employment opportunities on offer, and main bus routes, then there is the potential to reduce levels of out-commuting, encourage the use of sustainable transport and therefore encourage a modal shift. Similarly, if growth were to be focussed to the south of the County/ Severnside along the M4 corridor, this would utilise good links to the M4 and other sustainable travel links including rail at Caldicot and Severn Tunnel Junction Train Stations. Growth to the south would also capitalise upon transport improvements such as the removal of the Severn Bridge toll and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the SE Wales Metro. If additional growth is located away from the main settlements and Severnside, in the rural areas, then this is likely to exacerbate the current trend of private vehicle use and increase traffic on the road network in the absence of significant interventions; given sustainable transport infrastructure is limited in these locations.

Considering the above, whilst no significant effects are predicted, much uncertainty remains about the overall performance of the options in relation to this ISA theme until the spatial strategy is more clearly defined. However, it is duly recognised that Options 1 and 2 have greater

potential for positive transport outcomes than the limited opportunities provided through Option 3, and the ranking of Options reflects this assumption.

## Natural resources (air, land, minerals, and water)

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

As the level of growth increases so does the likelihood for negative impacts on natural resources through the potential loss of greenfield/ agricultural land and mineral resources; reduced air quality as a result of increased traffic; and increased demand for water resources.

Most of the County's main settlements are surrounded by BMV (Grade 3a and above). Alongside soil resources, South Wales is well-endowed with aggregate resources and it has inherited over time a substantial volume of permitted reserves, although the reserves are often variable in terms of quality and location. There is one limestone quarry within Monmouthshire, the Ifton Quarry which whilst not currently worked could be worked in the future. Additional limestone resources exist in the southern part of the County, but in general, the area is sensitive in terms of environmental capacity. Furthermore, some parts of the limestone resource lie within the Wye Valley National Landscape (previously Area of Outstanding Natural Beauty, or AONB); MTAN1 (paragraph 49) indicates that no allocations should be made in respect of such areas. There are no significant sources of secondary aggregates in the area. Under the adopted Monmouthshire Local Development Plan Policy M2 (Minerals Safeguarding Areas), safeguarding zones are identified for sand and gravel and limestone resources within the County. A substantial part of the south of the County is affected by the limestone safeguarding area. The sand and gravel deposits are predominantly located in the Usk Valley.

It is considered that mineral landbank obligations could be met under all Options, though it is recognised that increasing levels of growth will put increasing pressure on safeguarded areas, particularly those that encroach upon settlements. The overall loss of agricultural land and mineral resources is uncertain at this stage as it will be dependent on the precise location of development and if the land is greenfield or brownfield. The quality of agricultural land will also play a role in determining the potential significance of effects.

While it is recognised that the provision of housing alongside employment could promote efficient use of land and use of brownfield sites, it is also recognised that brownfield land is sparse throughout the County, and most development is anticipated to take place on greenfield



land. In this respect, Option 3, that proposes a low level of growth, is considered to perform better against this theme as will require less land take. This is reflected in the ranking of Options, with Option 1 performing least positively given it proposes the highest level of growth.

Whilst air pollution is not a significant problem in Monmouthshire, air quality across the County varies with two Air Quality Management Areas (AQMAs) declared in Usk and Chepstow. It is therefore considered that the significance of effects in this respect will be dependent on the location of growth, and the implementation of appropriate mitigation measures. As discussed under the transportation ISA theme, with an increase in population it is considered that higher growth Options 1 and 2 have greater potential for negative effects than Option 3 in relation to congestion on the existing road network. However, no evidence suggests this will lead to effects of significance. Ultimately the spatial strategy should seek to reduce congestion pressures at AQMAs, and new development provides opportunities to address infrastructure upgrade requirements that support more efficient movement in the highways network and active travel. New development also provides opportunities to increase local accessibility, particularly access to employment opportunities, which can in turn support reduced levels of out-commuting and congestion and support a modal shift. A higher level of homeworking brought on by the recent pandemic is also considered likely to continue to some degree as a longer-term trend supporting reduced congestion and improved air quality. Considering this, whilst no significant effects are considered likely at this stage, the overall nature and significance of the effects in relation to air quality under all options remains uncertain until the precise location of development is known.

Water is supplied to Monmouthshire by Dwr Cymru/ Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth WRZ and the South East Wales Conjunctive Use System (SEWCUS) WRZ. The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. This WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050.<sup>31</sup>

Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands. As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there

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<sup>31</sup> Welsh Water (2019) Final Water Resources Management Plan 2019 <https://www.dwrcymru.com/en/My-Water/Water-Resources/Final-Water-Resources-Management-Plan-2019.aspx>



are no significant differences between the options in terms of effects on water resources. It is expected that development coming forward under any of the options can deliver water efficiency measures to support reduced water use per person per day.

There are 45 water bodies within Monmouthshire, 38 surface waters, such as rivers, lakes, canals and greens, and 7 groundwater bodies. 37 of these water bodies have been designated as protected areas, these are areas requiring special protection under other EC directives and waters used for the abstraction of drinking water. Not all water bodies are required to be assessed for chemical status, of the 15 in Monmouthshire which are required to be assessed 2 are failing to achieve good status, one groundwater and one river. The river that is failing is the section of the River Usk between the confluence with the River Gavenny and the confluence with the Olway Brook. The main reasons for the failures identified by these assessments have been identified as diffuse pollution from agriculture, low flows/ abstraction and physical modifications to watercourses, predominantly barriers to fish migration. In addition, there are some known urban diffuse sources from combined sewer overflows/ misconnections, affecting the Nedern Brook and the Gavenny River.

Option 1 proposes a high level of growth, and therefore could place increased pressure on sewerage infrastructure; with the potential for long term negative effects. The increased growth could have impacts on water quality through increased impermeable surfaces and transfer of pollutants, but it is considered that there is suitable mitigation available at a development management level to ensure that residual effects are not significant. Taking the above into account, it is considered that there are no significant differences between the options at this stage in terms of the water environment.

## Biodiversity and geodiversity

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of biodiversity and geodiversity the impacts will ultimately be dependent on the precise location of development. There are five European sites (Special Areas of Conservation (SAC), Special Protections Areas (SPA) or Ramsar sites) within the County; Severn Estuary SAC/ SPA/ Ramsar Site, River Wye SAC, River Usk SAC, Wye Valley Woodlands SAC, and the Wye Valley and Forest of Dean Bat sites SAC. Additionally, there are a further four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, Avon Gorge Woodlands SAC and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and could possibly be affected by growth proposed through the RLDP.

In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs), located within the County, east of Monmouth. In terms of locally important biodiversity, there is one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. There are also approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs) designated within the County.

It is assumed that none of the Options would result in the loss of any international, national, or locally designated sites or lead to negative effects of significance in this respect. However, the decreasing level of growth under Options 1 to 3 is likely to require decreasingly less land take. As land take increases, there is likely to be wider habitat loss and fragmentation as well as increased pressure; notably disturbance (through recreation, noise, and light pollution), atmospheric pollution, and through impacts on water quality and resources. It is recognised that a HRA is currently being revised for the RLDP, which will determine the impact on the designated sites and their features. For the purposes of ranking the options, it is considered at this stage that Option 1, by proposing the highest level of growth has the greater potential for negative effects of significance in relation to designated sites. This is followed by Option 2, with the lowest growth Option 3 performing most positively in this respect. The ranking of Options reflects this assumption.

Despite this, it is recognised that higher levels of growth could also offer greater opportunities for delivering biodiversity net gain, creating new linkages through improvements to green infrastructure, securing and/ or enhancing ecological connectivity, public open space, and recreation provision through planning gain. However, this is uncertain at this stage as the location of development is not known. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors.

Overall, it is considered that effects are uncertain for all options, in the absence of known development locations. In terms of ranking the options, there is an assumption that as the level of growth increases through Options 2 and 1, so too does the potential significance of negative effects. Option 3 (lowest growth) is therefore ranked as the best performing option, and Option 1 (highest growth) worst; although it is recognised that an appropriate spatial strategy under any option could avoid significant negative effects arising.

## Historic environment

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of the historic environment the impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has 31 Conservation Areas that are dispersed throughout the County. There are also 45 Historic Parks and Gardens varying considerably in size and character, three Landscapes of Outstanding Historic Interest, including Blaenavon Industrial World Heritage Site, and 164 Scheduled Monuments within Monmouthshire. There are also 2,149 listed buildings spread across the County.

While it is assumed that none of the Options would result in the loss of any designated heritage assets, all options have the potential to lead to significant negative effects, dependant entirely on the location of growth. In terms of ranking the options there is an assumption that the highest level of growth (Option 1) has the potential to result in greater levels of settlement expansion, loss of countryside at the settlement edge, affect views into and from settlements, which is particularly important for areas with designated conservation areas. Conversely effects in this respect could be lesser under low growth (Option 3). This is uncertain at this stage as the location of development is not known, but the ranking of options reflects these assumptions.

It is also highlighted that options delivering the highest levels of growth could also offer more opportunities to improve access to designated heritage assets or help to redevelop brownfield areas that are currently detracting from the historic environment. However, again this is uncertain at this stage. The nature and significance of residual effects will therefore ultimately be dependent on the exact location, design/ layout of development and the implementation of mitigation measures.

At this stage it is not possible to confirm any significant differences between the Options or conclude that they are likely to have significant effects on the historic environment. None of the Options are likely to have a significant effect on the Welsh language.

## Landscape

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

As for a number of other ISA themes, the nature and significance of effects on landscape/ townscape impacts will ultimately be dependent on the precise location and design of development. Monmouthshire has a rich and diverse landscape, incorporating part of the Wye Valley National Landscape to the east of Monmouthshire and part of the Brecon Beacons National Park to the north west. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers some 14,880 hectares, which accounts for approximately 17% of the County. The part of the Wye Valley National Landscape located within Monmouthshire covers approximately 11,710 hectares and accounts for approximately 16% of Monmouthshire. There are also three landscapes of outstanding historic interest within Monmouthshire; including the Blaenavon Industrial World Heritage Site, the Gwent Levels and the Lower Wye Valley. A small portion of the Blaenavon World Heritage Site (approximately 20 hectares) lies within the Monmouthshire local planning area.

The decreasing levels of additional growth proposed under Options 1 to 3 are likely to require decreasing levels of land take. As such, highest land take under Option 1 is likely to place the greatest pressure on greenfield land resources, resulting in wider impacts on the landscape across the County. Given the limited brownfield land available in the County, it is considered that most additional growth will be delivered on greenfield land on the edge of existing settlements, placing increased pressure on the County's landscape interests and rural character with the potential for long term negative effects. While effects are broadly uncertain at this stage as the location of development is not known, the ranking of options reflects these assumptions.

It is noted that the delivery of any additional growth in the more rural areas is also more likely to result in a residual negative effect of greater significance, but again, this is dependent on the sensitivity of the landscape and scale and design/ layout of development.

Alongside the potential for negative effects, it is recognised that there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages through improvements to green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. As above, the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.

Considering the above, the overall effects remain uncertain for most Options. Despite this, the increased pressures on greenfield land and rural landscapes under higher growth Options 1 and 2 are reflected in the ranking of the Options.

## Climate change (including flood risk)

Options	Option 1 – Existing preferred strategy	Option 2 – Demographic-led strategy	Option 3 – WG prescribed growth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. At this stage, no specific opportunities, that would help to significantly reduce per capita GHG emissions or deliver new low carbon or renewable energy infrastructure, are known. It is also assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.

However, higher growth options are noted for their greater potential to support infrastructure upgrades that reduce congestion and improve accessibility (particularly in terms of sustainable transport and active travel), and support a transition to lower-emission, and carbon neutral economies and networks. Further, the higher growth options are also considered for their greater potential to contribute to improved ecological connectivity, green infrastructure networks, open spaces, and urban greening measures which support improved climate resilience. As a result, higher growth options are considered for greater potential positive outcomes, and this is reflected in the ranking of options, with Option 1 performing most favourably overall.

In terms of climate change adaptation, it is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and Sustainable Drainage (SUDs) legislation. Alongside the potential for negative effects, it is recognised that there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages through improvements to green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. As above, the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.

Considering the above, the overall effects remain uncertain for all Options. Despite this, the increased pressures on greenfield land and rural landscapes under higher growth Options 1 and 2 are reflected in the ranking of the Options.

## Appendix C – ISA of location of growth options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the location of growth options. The location of growth options are detailed in Table AC.1. A comparative appraisal of the options has been carried out under each ISA Theme. The appraisal assumes that each option will deliver the same quantum of growth.

### Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.

**Table AC.1: Location of growth options**

<b>Option</b>	<b>Description</b>
<b>Option 1 – Continuation of the existing LDP Strategy</b>	Growth would be distributed development around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas to enable provision of affordable housing throughout the County. New residential development would be accompanied by new employment opportunities, where possible.
<b>Option 2 – Distribute growth proportionately across the County’s most sustainable settlements</b>	Growth, including jobs and affordable housing, would be distributed across the County’s most sustainable settlements, 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.
<b>Option 3 – Focus growth on the M4 corridor</b>	Growth would be predominately located in the South of the County in the Severnside area close to the M4/M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England, existing economic opportunities and regional infrastructure connections, including via the South Wales Main rail line at Severn Tunnel Junction. Affordable Housing would be directed to those sustainable areas in the south of the County identified in the LHMA as having the greatest housing.
<b>Option 4 – Focus growth in the north of the County</b>	Growth would be predominantly located in the most sustainable Settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Affordable Housing would be directed to those sustainable areas in the north of the County identified in the LHMA as having the greatest housing.



## Economy and employment

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>

Monmouthshire's increasing ageing population and shrinking working age population is currently limiting employment growth throughout the County. This is exacerbated by limited job opportunities and limited public transport, particularly in rural areas, making it harder to access jobs, services and facilities.

Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth, Raglan and Usk, all provide a range of employment opportunities, which is evidenced by their higher levels of self-containment.<sup>32</sup> The level of self-containment is a useful indicator of the number of people who live and work within the same settlement; providing significant potential for sustainable travel. Opportunities to maximise the self-containment of these settlements are more likely to be taken through Options 1 and 2 by focussing housing and employment growth towards these settlements. This will strengthen the local economy, ensuring an appropriate economic base to enable younger people to live and work locally within the County. It is considered that positive effects in this respect are also anticipated through all other Options; however, lower growth at these settlements may reduce positive effects in terms of promoting economic growth in the County's key centres.

Option 3 will lead to positive effects through responding to the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. It seeks to capitalise upon the continuing economic growth of the Bristol/ South West region and the opportunities for Monmouthshire as a border County and its location between the 'Great Western Cities'. Directing growth close to the M4/ M48 will therefore provide residents with good access to economic opportunities throughout the region, utilising the infrastructure connections to the South of the County. In this context, it is recognised that the main concentrations of employment outside of the Primary Settlements are in the Severnside area, with the Primary Settlements and Severnside accounting between them for nearly 72% of all employment.<sup>33</sup> Directing growth to the South of the County therefore has the potential to deliver long term positive effects against this ISA theme.

<sup>32</sup> Monmouthshire County Council (2019) Sustainable Settlement Appraisal (Draft) Update reference

<sup>33</sup> Business Register and Employment Survey 2017

Option 4 will, conversely, lead to positive effects through focussing growth in the most sustainable Settlements in the North of the County, capitalising upon its strategic links to the Heads of the Valleys. Like Option 3, Option 4 also seeks to take advantage of the wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Targeted growth in the North of the County therefore has the potential to lead to increased levels of self-containment, supporting sustainable communities at the most sustainable Settlements of North Monmouthshire. However, it is recognised that within Options 3 and 4, concentrating growth in either the South or North of the County would result in limited employment opportunities outside these areas, which would exacerbate existing high levels of out-commuting in other settlements (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3, and Chepstow, Usk and Severnside under Option 4). Additionally, this may limit economic growth in the wider County and exacerbate existing demographic issues.

Another key issue for the County is the changing role of high streets. Changing shopping habits, the use of out of town retail centres and increased levels of internet shopping has resulted in increased vacancy rates in some of the County's main retail centres such as Abergavenny; impacting on local economic growth. The ongoing pandemic has also highlighted the importance of high streets and the need to protect the role and function of the high street in the local community. Technical Advice Note 4 (TAN 4) reiterates the important role that retail and commercial centres play in creating sustainable locations, seeking to ensure they have a positive future. It states that *"...good access to and within, retail and commercial centres is key, both to the vibrancy of those places and to ensure that everyone in society has access to the wide variety of goods and services."* Options 1 and 2 will lead to positive effects in this respect, through supporting the existing centres; protecting their vitality and viability through increasing footfall, and supporting existing/ attracting additional facilities, in the main county towns. Conversely, Options 3 and 4 which direct growth towards certain centres and not others may further the trend of increasing vacancy rates on those centres where growth is not focussed, leading to negative effects against this ISA theme. Specifically, long term positive effects are anticipated where options support the regeneration of the County's main centres. Investing in existing centres through Options 1 and 2 will likely retain retail expenditure and attract inward investment, adapting positively to the changing role of the high streets throughout the County.<sup>34</sup>

Tourism plays a significant role in the Monmouthshire economy, particularly in assisting in rural diversification. The County's historic town centres also attract tourists. All of the options could have a positive effect on tourism with Options 1 and 2 performing more strongly as growth is also directed to rural areas across the County.

Overall, Options 1, and 2 are likely to lead to positive effects of greatest significance; facilitating sustainable growth in accordance with the settlement hierarchy, addressing localised economic issues and supporting a well-connected diverse economy. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant

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<sup>34</sup> Monmouthshire Retail Background Paper, 2018

enough to warrant one option being ranked higher or lower than the other. Comparatively Options 3 and 4 perform less well given they focus growth in one area of the County to the potential detriment of the other.

## Population and communities

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>

As a result of in-migration the population of Monmouthshire has shown a steady increase over a ten year period to 2011; the County has a negative natural change. All Options perform positively in terms of providing housing to meet the identified needs of the County, with Options 1 and 2 best performing in this respect. Options 1 and 2 would provide affordable housing throughout the settlement hierarchy, ensuring a range and choice of homes are delivered, particularly where there is a need for affordable housing, to assist in regaining a balanced population. In terms of Options 3 and 4, housing will be delivered to either the South of the County (Option 3) or the North of the County (Option 4) only, resulting in needs not being met across all housing market areas. Additionally, there is a need to consider the potential impact on house prices arising in this context, given the delivery of affordable homes will be focussed in either the South or the North, and not meet needs more widely.

In terms of addressing the wider needs of communities, Options 1 and 2 will deliver long term positive effects through focussing the majority of growth at the Primary Settlements and Severnside. It is considered that facilitating the provision of increased accessible services in these urban areas, supported by connective infrastructure, will meet local needs, recognising the role of these settlements as service hubs for their rural hinterlands. This will contribute positively towards encouraging younger people to reside in the County, and addressing issues surrounding accessibility for elderly residents. A level of housing will also be provided under Options 1 and 2 in Secondary Settlements, the Severnside area and some of the Rural Settlements. The Secondary Settlements offer services of a more local nature aimed at meeting the daily needs of their inhabitants and those living in the surrounding areas, while outside of these settlements are a large number of smaller settlements with a limited offer in terms of services and facilities. It is therefore recognised that delivering higher growth to these smaller rural settlements through Options 1 and 2 may place additional pressure on existing social infrastructure at these locations; notably health care facilities unless supported by new or enhanced infrastructure capacity.

Option 3 will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links

will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County. Similarly, Option 4 will lead to positive effects through capitalising upon its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the North of the County.

However, concentrating growth in the South (Option 3) or the North (Option 4) would also result in limited investment in infrastructure/ facilities outside the targeted locations, which would exacerbate existing reliance on the car and high levels of out-commuting in other areas (i.e. Abergavenny/ Llanfoist, Chepstow and Monmouth under Option 3 and Chepstow, Caldicot, Usk and Magor under Option 4). Additionally, through Options 3 and 4, existing centres outside of the key development areas (namely the Severnside area (Option 3) and the most sustainable Settlements to the North (Option 4)) would not be supported, resulting in limited growth at these settlements. Rural areas in particular will be disadvantaged as they would not benefit from additional housing to help support existing facilities or attract additional facilities.

Consideration must also be given to the recent publication of the Future Wales The National Plan 2040 (Working Draft National Development Framework (NDF)) which indicates a desire to designate a Green Belt "*around Newport and eastern parts of the region*". This is anticipated to include a large part of South Monmouthshire which may constrain future growth to some extent in this part of the County, although it is recognised that no main towns are considered to be within the Green Belt. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. Conversely the delivery of Option 3 would lead to negative effects; conflicting substantially with the Future Wales document through directing growth to the south where the Green Belt has been proposed. As all other Options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

Overall, Options 1 and 2 are considered to perform best as they provide sufficient housing and employment opportunities to meet identified housing and economic growth needs throughout the County. Further the options distribute housing in line with the settlement hierarchy, helping to meet the needs of all communities. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. Comparatively Option 4 and in particular 3 perform less well due to the focus of growth in either the North or South of the County.

## Health and wellbeing

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of improving the health and wellbeing of residents, Option 1 and 2 are anticipated to lead to long term positive effects through supporting and sustaining a hierarchy of vibrant town and village centres across the County. It is considered that the focus of growth in the Primary Settlements of Abergavenny, Chepstow and Monmouth, and Severnside settlements, would ensure sustainable access to a range of community services and facilities, including health, leisure and recreation; notably three of the four leisure centres in Monmouthshire are located in these Primary Settlements. Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community cohesion. Positive effects in this respect are also anticipated through Option 4; however, the level of growth directed towards these settlements is likely to be less.

Whilst growth may place additional pressures on healthcare facilities, it is recognised that recent healthcare developments, such as the new critical care hospital in Cwmbran provides opportunities to support growth with enhanced sustainable healthcare care access in and around this location. Such opportunities are more likely to be capitalised upon under Options 1 and 2.

The delivery of Option 3 and Option 4 present the opportunity to capitalise upon regional infrastructure connections, and are considered to be well located in terms of access to health services. In this context, under Option 3 residents would be a reasonable distance from the Royal Gwent Hospital in Newport and the new critical care hospital in Cwmbran. Chepstow Community Hospital is also accessible, located to the east of the M4 corridor/ Severnside. Under Option 4, residents would also have good access to Nevill Hall Hospital. Through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the Capital Region Deal, Option 3 and Option 4 may also provide opportunity for achieving infrastructure improvements/ provision in the South of the County through Option 3, and the North of the County through Option 4, building more sustainable communities. However, under both Options, infrastructure provision would be limited in the rest of the County, which may exacerbate the existing deficiencies seen in many locations in relation to community and recreational facilities. This may contribute to rural isolation in certain areas; notably within smaller rural settlements outside of North Monmouthshire under Option 4.

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional Green Infrastructure, public open space and recreation. The value and importance of having access to locally accessible open/ green spaces to

assist in recreation and health and wellbeing has been heightened during the current pandemic and should be reflected in growth strategies. Options 1 and 2 perform most positively in this respect as growth (and therefore green infrastructure provision) is delivered throughout Monmouthshire, aiding ecological connectivity throughout the County. This is compared to Options 3 and 4 which focus development to the South and North of the County respectively.

Given the rural nature of the County, it is considered that all options will lead to positive effects in terms of providing residents with access to the countryside; although the quality of this access may differ. Options 1 and 2 perform most positively in this respect as they direct a significant level of growth to Abergavenny which is located in close proximity to the Brecon Beacons National Park, and Monmouth and Chepstow which are located in close proximity to the Wye Valley National Landscape. Significant growth at these locations will provide access to these valued natural spaces, supporting the mental and physical health and wellbeing of residents.

Overall, it is considered that all Options provide a significant opportunity to deliver improvements to social/ community infrastructure. The level of infrastructure delivery is expected to be similar under all options; however, Options 3 and 4 perform less positively compared to Options 1 and 2 given the focus of growth to only the South or North of the County. All Options also provide an opportunity to deliver new and improved areas of multi-functional Green Infrastructure alongside development, and promote access to the countryside, which has become increasingly important in light of the current pandemic. Options 1 and 2 are best performing in this respect given the direction of growth towards more areas of higher accessibility, and more dispersed growth with new provisions benefitting more areas.

### Equalities, diversity, and social inclusion

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Uncertain</b>	<b>Uncertain</b>

At the time of the 2014 Welsh Index of Multiple Deprivation (WIMD) none of the 56 lower super output areas (LSOAs) in Monmouthshire were in the most deprived 10% (Ranks 1-191) in Wales or the most deprived 20% (Ranks 1-382) in Wales. However, the 2019 WIMD now shows that alongside 20 LSOAs in the 50% most deprived (doubled since 2014), 5 LSOAs were in the 30% most deprived, and 2 LSOAs were in the 20% most deprived. Almost half (47%) of the total population live in wards defined as being in rural areas (i.e. with a population of less than 10,000). Population densities are, as would be expected, highest in the towns, with the majority of rural wards having low population densities when compared to national averages. Therefore Option 1 and 2 which seek to focus growth towards Primary Settlements are anticipated to lead to long term positive effects in terms of providing increased opportunities through employment and

housing provision for the younger population to live and work in Monmouthshire; enhancing the service roles of these settlements. The current pandemic has demonstrated the importance of ensuring communities are balanced and socially sustainable, particularly in terms of demography. Option 1 and 2 will also lead to positive effects through reducing inequalities between rural and urban areas; supporting and sustaining a hierarchy of vibrant centres across the County.

Option 3, through capitalising upon the strategic links to the Cardiff Capital Region (CCR) and the provisions of the CCR City Deal, would likely provide opportunity for building more sustainable communities and achieving infrastructure improvements/ provision in the South of the County. However, this limits opportunities for sustainable development in the Primary, Secondary and rural settlements in the rest of the County, which may lead to increased levels of inequality throughout Monmouthshire. Additionally, it is considered that if mixed-development is not prioritised and successfully utilised through Option 3, there will be a risk of exacerbating existing problems of lack of social and community facilities in rural locations, and high levels of out-commuting in Severnside. This option could lead to rural isolation. Similar effects are anticipated through the delivery of Option 4, given development would be located at the most sustainable Settlements within the North of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40, along with rail links to Newport, Cardiff and the North via the Welsh Marches line. Growth in the North of the County would provide access to employment, retail, community facilities and social infrastructure, building sustainable communities through the provision of homes and jobs and improved levels of self-containment. However, through Option 4 housing would only be directed to the North of the County and would not address need in other areas across the County; likely impacting upon Monmouthshire's demography, leading to inequality across the County. This would likely impact on the sustainability of existing rural areas as no additional growth would be provided to help maintain/ support rural facilities, or attract additional rural employment opportunities. This option could also lead to rural isolation.

Monmouthshire's population profile in terms of ethnic groups is different to both the Wales average and that of the South East Wales region as a whole. At the time of the 2021 census, 96.9% of Monmouthshire's population classified themselves as white, compared to 93.8% in Wales.<sup>35</sup> The South East Wales figures are particularly influenced by the population profile of Cardiff which accounts for over 25% of the population of the region, and as would be expected the population profile is much more diverse in the city. Directing growth to the South of the County through Option 3 may contribute positively towards increasing the ethnic diversity within the County. In this context, utilising strategic links to the Cardiff Capital Region and South West England will likely support cross-boundary community cohesion, and capitalise upon regional social infrastructure connections. Positive effects are also identified in this respect in relation to Option 4, given there is the potential to develop links from Abergavenny to the wider Cardiff Capital Region.

Overall, Options 1 and 2 are preferred as they seek to support and sustain a hierarchy of vibrant centres across the County, directing the majority of the growth to the most sustainable settlements while also still delivering growth in the secondary settlements and rural areas.

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<sup>35</sup> ONS Census 2021 'Build a custom area profile' can be accessed via <https://www.ons.gov.uk/visualisations/customprofiles/build/>



This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. They are also anticipated to lead to positive effects in this respect, delivering affordable housing in both urban and rural areas and where there is greatest need. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other. While Option 3 and Option 4 may support more sustainable communities and achieve social infrastructure improvements/ provision in the South and North of the County respectively, these options perform least well due to the likely isolation of communities and continuation of imbalanced demographic profile across Monmouthshire.

## Transport and movement

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Existing travel patterns in Monmouthshire reflect its rural nature; with a trend of relatively long travel to work distances, high levels of car ownership and reliance on the private car. Specifically, in 2021 52.4% of the resident population of Monmouthshire were travelling to work by car or van, compared to 56.5% in Wales.<sup>36</sup> The primary points of road congestion in the region are on the M4, with regular issues of congestion near Newport reflecting the high commuter levels; affecting connectivity between Monmouthshire and Cardiff.<sup>37</sup> However, it is recognised that the recent increase in home-working as a result of the current pandemic is likely to continue over the longer term which will likely support reduced commuting levels and congestion in the future.

While focusing growth along the M4 corridor through Option 3 may intensify traffic levels, it also has the potential to link housing and employment growth, utilising links to the M4 corridor and the removal of the Severn Bridge Tolls. This would reduce the need to travel by car, capitalising upon existing sustainable transport links such as rail at Caldicot and Severn Tunnel Junction Train Stations; and forthcoming improvements such as the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. The Metro will provide an opportunity for alternative sustainable travel; providing faster, more frequent and joined-up services using trains, buses and light rail.<sup>38</sup> Notably, the Regional Bus Rapid Transit will provide a west-east connection that will complement north-

<sup>36</sup> ONS Census 2021 'Build a custom area profile' can be accessed via <https://www.ons.gov.uk/visualisations/customprofiles/build/>

<sup>37</sup> Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

<sup>38</sup> Welsh Government (2018) Rolling out our Metro <https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf>



south travel connectivity provided by the railway lines, and provide residents with direct access to economic opportunities located in the Heads of the Valleys corridor.

Positive effects are also anticipated in this respect but to a lesser extent through Option 4, which seeks to predominantly locate growth in most sustainable Settlements within the North of the County. This is with the ambition to capitalise on strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, lack of development outside of the Severnside area through Option 3, and outside of the most sustainable Settlements in the North through Option 4, would not generate sufficient infrastructure improvements and gains in other areas across Monmouthshire. This would likely exacerbate out-commuting in other areas and would not assist in improving self-containment of the main County towns outside the targeted growth areas (i.e. Abergavenny, Chepstow and Monmouth under Option 3, and Chepstow, and Severnside under Option 4).

In terms of sustainable transport options available throughout the County, buses are most predominant, with the County being served by both local and national routes. The Primary Settlements of Abergavenny, Chepstow and Monmouth all have bus stations with hourly (or more frequent) services extending to the surrounding towns and villages and to the sub-region, including Bristol, Gloucester, Hereford, Newport and Cardiff. In terms of rail provision, Monmouthshire has four railway stations, Caldicot, Chepstow and Severn Tunnel Junction in the South of the County and Abergavenny in the North. The centre and north east of the County are poorly served for rail travel. Options 1 and 2 will therefore lead to long-term positive effects through directing growth to these Primary Settlements, capitalising upon the sustainable transport offer and supporting lower levels of car use.<sup>39</sup>

The Public Rights of Way (PRoW) network is generally good throughout Monmouthshire; with some localised fragmentation, notably in the rural areas. There are also two national cycle routes within the County, both of these run from Chepstow; number 4 - The Celtic Trail (Severn Bridge to Pembrokeshire) and number 42 (Chepstow to Glasbury, Powys).

The Active Travel (Wales) Act (2013) requires local authorities in Wales to deliver year on year improvements in active travel routes and facilities. As such, Monmouthshire has prepared a series of Integrated Network Maps (INMs) which set out the Council's plans for improving active travel routes in and around certain settlements over the next 15 years. At the time of preparation, the guidance stated that the settlements should have had a population of at least 2,000 at the time of the 2001 Census. For Monmouthshire this included the settlements of Abergavenny, Caldicot, Chepstow, Magor Undy, Monmouth and Usk. However, there are existing active travel routes in smaller settlements. The maps produced show proposed future networks of key walking and cycling routes, and include schemes for

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<sup>39</sup> Welsh Government (2018) Rolling out our Metro <https://gov.wales/sites/default/files/publications/2018-06/south-wales-metro-brochure.pdf>

delivery in the next couple of years, schemes for delivery in the medium term (5-10 years), and longer-term (10-15 years) proposals of a more aspirational nature. The INMs were submitted to Welsh Government on 27 February 2018 and these have now been approved.<sup>40</sup>

Options 1 and 2 focus development at settlements that provide the best current and future opportunities for achieving sustainable development; which offer a choice of transport modes and contribute towards the development of a sustainable transport network. New development will likely capitalise upon existing transport infrastructure at these locations, further promoting active travel and integrated sustainable transport opportunities. Additionally, it is considered that delivering jobs and homes in these locations will likely support levels of self-containment, reducing the reliance on the car for employment.

Despite the likelihood that higher levels of homeworking will prevail following the current pandemic, there is no guarantee that all residents will live and work in the same area, and a proportion are likely to continue the trend of out-commuting by car for journeys (recognising that currently only 1.2% of Monmouthshire resident working population travel to their place of work using public transport).<sup>41</sup> Congestion is notably an issue of concern in Chepstow (given the Air Quality Management Area [AQMA] present) where a large proportion of growth through Option 1 and 2 is targeted. This presents a challenge for development, as there is significant risk that this trend would be intensified.

An appropriate amount of development is also allocated through Options 1 and 2 to Severnside; with a lower level of growth to the County's secondary settlements and rural areas, recognising that in many rural areas there is often no accessible sustainable transport offer. Infrastructure provision is notably lacking in rural areas in the North of the County, and it is recognised that a Welsh Government (and subsequent Local Transport Plan (2015)) priority is to *“maximise the contribution that effective and affordable transport services can make to tackling poverty and target investment to support improvements in accessibility for the most disadvantaged communities”*. It is noted that this has been partly addressed by the introduction of a 'grass routes' bus service<sup>42</sup>, which might be utilised through Option 2 supporting the growth of rural communities. However, further improvements to accessibility in these settlements are unlikely to be achieved as growth would not be of a critical mass to support significant infrastructure delivery. Directing growth to the rural settlements will therefore likely promote unsustainable travel patterns, with (despite a likely higher level of homeworking) a proportion of residents continuing to travel by car to existing centres to access services and employment.

It is recognised that all Options have the potential to contribute positively towards the Welsh Government's commitment to reducing reliance on the private car and supporting the transport hierarchy and a modal shift to walking, cycling and public transport (Planning Policy Wales, Edition 10). However, Options 1 and 2 are identified as best performing through directing growth to the Primary Settlements, which are all

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<sup>40</sup> Monmouthshire County Council (2020): Sustainable Settlement Appraisal can be accessed via

<https://democracy.monmouthshire.gov.uk/documents/s26562/Appendix%201%20Sustainable%20Settlement%20Appraisal%20March%202020.pdf>

<sup>41</sup> ONS Census 2021 'Build a custom area profile' can be accessed via <https://www.ons.gov.uk/visualisations/customprofiles/build/>

<sup>42</sup> A demand responsive bus service available during the week for all residents of Monmouthshire and accommodation providers who are members of the scheme

multi-modal transport hubs that benefit from active travel routes, existing railway stations (at Abergavenny and Chepstow only) and frequent bus services. The Primary Settlements are also well placed geographically to take advantage of the strategic road network in the County. These options are therefore most likely to promote a safe, efficient, accessible and sustainable transport system that supports self-containment at the Primary Settlements; providing opportunities for walking and cycling and encouraging active travel. There are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to warrant one option being ranked higher or lower than the other.

Option 3 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/provision in the South of the County, while Option 4 will lead to long term positive effects through building more sustainable communities and achieving transport improvements/provision in the North of the County. However, this would be at the expense of the remainder of the County, exacerbating out-commuting and private vehicle use in other areas. At this stage the potential effects are considered to be uncertain until further evidence base work is carried out relating to the impacts of growth on the highway network.

## Natural resources (air, land, minerals, and water)

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

In terms of air quality, while this is not a significant issue for the County, it is nonetheless recognised that air pollution is a major cause of death and disease globally.<sup>43</sup> The greatest problems associated with air quality in the County are caused by vehicle emissions; evidenced by the two Air Quality Management Areas (AQMAs) declared at Primary Settlement Chepstow and Secondary Settlement Usk for NO<sub>2</sub>.<sup>44</sup> Directing growth to these locations through Options 1 and 2 (and to a lesser extent Option 3) has the potential to exacerbate existing air quality issues through increased road users and subsequent increased levels of congestion. Notably, Chepstow AQMA includes the A48, between the roundabout with the A466, which would likely be utilised by commuters. The Air Quality Action Plans for both areas contain many transport-related measures, and these have been taken account through the development of the LTP (2015).<sup>45</sup> In accordance with the LTP and higher level policy frameworks, Options are anticipated to deliver mitigation where possible; ensuring the location of new

<sup>43</sup> World Health Organisation (2022) Ambient (outdoor) air pollution [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

<sup>44</sup> Air Quality in Wales (no date) Air Quality Management Areas <https://airquality.gov.wales/laqm/air-quality-management-areas>

<sup>45</sup> Monmouthshire County Council (2015) Monmouthshire Local Transport Plan [online] available at: <https://www.monmouthshire.gov.uk/local-transport-plan/>

development does not worsen conditions in the AQMAs, or result in the declaration of new ones. Further, the pandemic has resulted in higher levels of homeworking which are likely to prevail in the longer-term, reducing congestion pressures on air quality. In this context, Options 1 and 2 will likely further support the increased use of sustainable transport and reduced reliance on the private vehicle through delivering homes that are well located to services, facilities and employment in existing centres.

Delivering under all Options has the potential to lead to positive effects through capitalising upon the strategic links to the Cardiff Capital Region and the provisions of the CCR City Deal. The Capital Region is committed to a low carbon future, delivering healthier and sustainable travel options, which would likely provide opportunity for building more sustainable communities and improved air quality.

There is a limited supply of brownfield land in the County, with the average percentage of housing completions on brownfield land over years totalling approximately 48.4%.<sup>46</sup> The lack of brownfield land in the urban areas is a concern for the RLDP, with limited opportunities existing in the Primary Settlements only. Options 1 and 2 are therefore best performing in this respect, as while growth is likely to be predominately greenfield development, brownfield land within the Primary Settlements will be utilised where possible. Option 4 seeks to deliver growth to the most sustainable Settlements in the North, which includes Monmouth and Abergavenny, in addition to Raglan; a Secondary Settlement. A significant proportion of development under Option 4 is therefore likely to be on greenfield land. Option 3 is also considered to lead to long term significant effects as there are limited opportunities for brownfield development in the Severnside area, with development likely to be predominately on greenfield land.

Monmouthshire has a significantly high percentage of best and most versatile agricultural land (i.e. Grade 1, 2 or 3a). While there is a need to conserve these resources, there are limited opportunities within the County for development on lower grades of agricultural land (i.e. Grade 3b, 4 and 5). All options are therefore likely to result in the loss of some areas of BMV agricultural land, leading to significant long term negative effects against this ISA theme. The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).<sup>47</sup> This data model allows you to predict the distribution of BMV land throughout the County, and in relation to key areas as set out in the settlement hierarchy:

- **Primary Settlements** are predominately urban centres, with areas of Grade 3a land located to the east of Abergavenny and integrated between the main urban area throughout Monmouth. Interspersed areas of high quality Grade 2 land and non-agricultural land are present around Chepstow.

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<sup>46</sup> Monmouthshire Housing Land Availability Surveys 2008-2018

<sup>47</sup> <http://lle.gov.wales/map/alc#m=-2.7235,51.59785,14&b=europa&l=908h;893h;1326,0,37;>

- **Secondary Settlements** include significant areas of BMV land; areas of Grade 3a land surround Usk (notably to the south). North east/ and north west of Penperlleni and north/ north east of Raglan are areas of Grade 3a land. Grade 2 and 3b land is dispersed outside of Raglan's urban area.
- **Severnside** is particularly constrained by Grade 2 and Grade 1 land, surrounding the M4. Significantly constrained areas include the entirety of Crick, and large areas within Caerwent, between Rogiet and Magor/ Undy, and north of Sudbrook.
- **Rural settlements** have not yet been defined<sup>48</sup>; however, it is recognised that outside of the main settlements there is a significant amount of BMV agricultural land, reflecting the rural nature of the County.

In terms of the Options, it is therefore considered that directing growth to the existing main settlements through Options 1 and 2 will help to protect best and most versatile agricultural land in the rural areas. Option 4 is also anticipated to perform well in this respect, given growth is directed to the primary settlements of Abergavenny and Monmouth, and the secondary settlement of Raglan. However, it is recognised that there are limited opportunities for brownfield development within the County's existing urban areas, and that the delivery of all Options would inevitably lead to loss of greenfield land, as discussed above. Nonetheless it is considered that residual loss may be less significant under Option 4 as the settlements in the North are not identified as being significantly constrained in terms of BMV land. Given the extent of BMV land surrounding Severnside and the M4 corridor, it is considered that Option 3 will lead to significant long term negative effects through inevitable permanent loss of BMV land.

While mineral extraction plays a limited role in Monmouthshire's economy, there remains a need to safeguard the County's mineral resources in order to make an appropriate contribution to the sustainable supply of aggregates to the wider South Wales economy. Development would be located away from safeguarded areas under Options 1, 2 and 4. Due to the focus of development in the South of the County through Option 3, this Option has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present. Option 3 is therefore worst performing in this respect. The Options are considered to lead to neutral effects in terms of waste, as it is considered that all of them are capable of being served by appropriate waste infrastructure.

Water is supplied to Monmouthshire by the Dwr Cymru/Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. Monmouthshire falls within two Water Resource Zones (WRZs); Monmouth and the South East Wales Conjunctive Use System (SEWCUS). The Monmouth WRZ supplies the market town of Monmouth and the surrounding villages. The WRZ is heavily dependent on the Mayhill abstraction from the River Wye at Monmouth. There is also a spring abstraction at Ffynnon Gaer which supplies a small localised area south of Monmouth. The SEWCUS supplies the majority of the County, and a significant proportion of the South East Wales Region. In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir

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<sup>48</sup> Monmouthshire County Council (2022) Growth and Spatial Options Paper can be accessed via <https://www.monmouthshire.gov.uk/app/uploads/2022/12/Growth-and-Spatial-Options-Paper-Sept-2022-1.pdf>

sources with small catchment areas. For both WRZs the total demand for water is forecast to remain relatively stable until 2030, with a decline in demand anticipated over the 2030-2050 planning period, and then to just 10% of current demands by 2050. Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands.

All Options are anticipated to deliver neutral effects in terms of impact on water resources, with no best performing Option identified. This is given the legal requirements in place for WRMPs, and that all Options are assumed to deliver the same level of growth throughout the Plan period. It is expected that development coming forward under any of the Options will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day. This is in accordance with PPW12 (2024) which outlines the contributions planning can make, including “ensuring resilient local choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability.”

Overall, while it is difficult to identify any significant differences between the options in terms of water resources and quality, Options 1 and 2 followed by Option 4, are best performing in terms of utilising brownfield land and protecting BMV agricultural land, and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately the majority of growth will be on greenfield and potentially agricultural land. Option 3 performs least well given it may also lead to the loss of significant greenfield/BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.

## Biodiversity and geodiversity

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	2	2	1	3
Significant effect?	Yes – Negative	Yes - Negative	Uncertain	Yes - Negative

It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity. In terms of internationally designated biodiversity sites, the following are located within the County:

- Severn Estuary** Special Protection Area (SPA), Special Area for Conservation (SAC), Ramsar Site, and Site of Special Scientific Interest (SSSI) is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.
  - Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl.
  - Primary reasons for Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity.
  - This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.
- River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.
- River Usk SAC** covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are



primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area. **Wye Valley Woodlands SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.

- **Wye Valley and Forest of Dean Bat sites SAC** straddles the Wales-England border, extending along the east of the County. It is underpinned by four SSSIs in Wales and nine in England, all of which lie entirely within the SAC. This composite of sites contains the greatest concentration of lesser horseshoe bat in the UK, totalling about 26% of the national population.
- There are an additional four European Sites within the Brecon Beacon National Park which must also be considered. These are Coed y Cerrig SAC, Cwm Clydach Woodlands SAC, Sugar Loaf Woodlands SAC, and Usk Bat Sites SAC. Further to this, Llangorse Lake/ Llyn Syfaddan SAC, in Powys, and Aberbargoed Grassland SAC Caerphilly fall within 15km of Monmouthshire and therefore could possibly be affected by growth proposed through the RLDP. A full HRA is currently being undertaken in respect of the replacement Monmouthshire LDP.

Additional development proposed through the RLDP is most likely to have impacts on the European sites discussed above through the loss and fragmentation of linear foraging habitats for bat species, atmospheric pollution, increased disturbance (recreation, noise and light), and through impact on water quality and resources. Both the River Wye SAC and the River Usk SAC are notably sensitive to increased nutrient loading, predominantly phosphates contributed from treated sewage effluent. Due to the increasing phosphate concentrations in both riverine systems, both Natural Resources Wales and Natural England have recently advised that development plans should not result in a net increase of phosphorus concentrations in both SACs, a concept known as nutrient neutrality. The HRA (2021) carried out for the RDLP concludes that potential residential or employment sites in Abergavenny and Monmouth are likely to have nutrient neutrality implications, because they are served by WWTWs discharging into the upper reaches of both SACs. The Chepstow and Severnside SGAs are served by Nash WWTW in Newport, which discharges into the Severn Estuary and therefore will not contribute phosphorus the River Wye and River Usk. More recent evidence shows there are solutions available at the WWTW's now, which will help to ensure no significant effects arise in relation to nutrient neutrality. It is recognised that the applicable options will require mitigation supported by RLDP policy provisions.

In terms of ranking the Options, it is considered that all Options are constrained to some extent by internationally designated sites. In this context, Option 3 has the potential to lead to negative effects on the Severn Estuary SAC given settlements such as Sudbrook within this Option are adjacent to the internationally designated site. Options 1, 2 and 4 have the potential to lead to negative effects on numerous internationally designated sites which extent throughout the Primary and Secondary Settlements. Notably the River Usk SAC passes through Abergavenny and Usk, the River Wye SAC passes through Chepstow and Monmouth, and Chepstow and Monmouth are also in close proximity of the Wye Valley Woodlands. As set out in the HRA (2021) development in Abergavenny and Monmouth is most likely to lead to nutrient neutrality implications with the potential for significant adverse effects on the SACs. Option 4 directs the highest level of



growth to these settlements, followed by Options 1 and 2, and therefore is worst performing in this respect overall. In terms of nationally designated sites, there are 50 SSSIs that fall wholly within the County. Most are woodland or grassland sites, with others designated for their wetland or geological interest, and a few designated for bat interest. It is noted that of these, 16 fall within the SACs listed above. Spatially, a significant proportion of the SSSIs are located to the north west of the County, within the Brecon Beacons National Park and surrounding Abergavenny. Growth directed to Abergavenny through Options 1, 2 and 4 therefore have the potential to adversely impact upon SSSIs; including Sugar Loaf Woodlands SSSI and Coed-Y-Person SSSI. Impacts are most likely to arise as a result of increased recreational disturbance. There is also a cluster of SSSIs to the east of the County around Monmouth, and dispersed in the rural landscape between Monmouth and Chepstow in the south, which may also be impacted by Options 1, 2 and 4 given growth is directed to these locations. Notably Fiddler's Elbow SSSI and Lady Park Wood SSSI are also the County's two National Nature Reserves (NNRs) and may be impacted by high growth at Monmouth.

There are also several SSSIs along the M4 corridor and to the southern extent of the County, including the Gwent Levels SSSI and component SSSIs under the Severn Estuary SAC as discussed above. Option 3 has the greatest likelihood for impacts on these SSSIs given the focus of development to the South of the County. Impacts are most likely to arise as a result of increased recreational disturbance, water pollution, and air pollution.<sup>49</sup>

All of the Options have the potential to impact nationally designated sites, the nature and significance of effects will ultimately depend on the precise location of development and the implementation of mitigation measures.

In terms of locally important biodiversity, there is just one Local Nature Reserve (LNR) designated within the County; Cleddon Bog. Cledden Bog LNR is located within the Wye Valley National Landscape in the rural landscape, and is not likely to be affected by any of the Options. Monmouthshire also includes approximately 650 Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites (LWSs)). These predominantly relate to grassland and ancient and semi-natural woodland areas. SINCs are dispersed throughout the County, and it is considered that development coming forward under any of the Options could have localised impacts on these designed sites.

In addition to designated sites, all Options have the potential to result in adverse effects on biodiversity through loss of greenfield land and priority habitats. Habitat fragmentation is a key issue for the County; for example, fragmentation of hedgerows caused by development and canalised streams and rivers. Options 1 and 2 are likely to result in habitat loss and fragmentation across a wider area of the County whereas Options 3 and 4 are likely to have an effect of greater significance on a more localised area.

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<sup>49</sup> Natural England (2015) Site Improvement Plan: Severn Estuary Mor Harfen <http://publications.naturalengland.org.uk/publication/4590676519944192>

Overall, it is considered that all Options have the potential to adversely impact upon the County's biodiversity resource, with the potential for significant residual negative effects. The focus of development in the Primary Settlements through Options 1, 2 and 4 will likely result in increased pressure on the environment, due to concentrating growth in locations around the existing main settlements in the North where a number of internationally/ nationally designated biodiversity sites are located. Notably, focussing growth at the Primary Settlements of Abergavenny and Monmouth through Option4 (and a lesser extent Options 1 and 2) have the potential to lead to nutrient neutrality implications within the River Wye and River Usk SACs. Option 4 and then Options 1 and 2 are therefore identified as worst performing overall. In terms of Option 3, a number of the smaller rural settlements and Severnside are also constrained at an international/ national level, and therefore the potential for adverse effects cannot be ruled out at this stage.

It is also recognised that all Options have the potential to deliver positive effects on biodiversity through enhancement measures. This is currently uncertain, and therefore at the County scale it is difficult to differentiate between the Options. Ultimately the nature and significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

## Historic environment

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	=	=	=	=
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

There is one internationally designated site falling partially within the County; Blaenavon Industrial World Heritage Site (WHS), located to the west of Abergavenny. The WHS was inscribed by UNESCO in 2000 on account of its industrial landscape having Outstanding Universal Value (OUV). A Management Plan has been prepared for the period 2018-2023 a suite of policies for the continued effective protection, conservation, presentation and transmission of the Site's OUV.<sup>50</sup>

There are also a range of designated heritage assets and archaeological areas within the County:

- **31 Conservation Areas** including a range of areas from market towns, rural villages and medieval castles. The largest three Conservation Areas are Mathern (231.6ha), Llanarth (203.1ha) and Abergavenny (152.8ha). In addition to these three, there are

<sup>50</sup> Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018-2023  
<http://moderngov.torfaen.gov.uk/documents/s35685/Blaenavon%20WHS%20Management%20Plan%20FINAL%20SEPTEMBER%202018.pdf>

Conservation Areas located in the remaining Primary and Secondary Settlements. There is a collection of Conservation Areas to the south of the County, including within numerous settlements along the M4 corridor, and within rural settlements along the eastern border of the County.

- **45 Historic Parks and Gardens** varying considerably in size and character, the largest of which are Chepstow Park and Piercefield Park, both located in Chepstow. Many Historic Parks and Gardens are located in Chepstow and the wider south east of the County, with others distributed throughout the settlement hierarchy and in the more rural settlements, notably south of Abergavenny and north west of Monmouth.
- **3 Landscapes of Outstanding Historic Interest** have been identified by CADW within the County – Blaenavon, the Gwent Levels and the Lower Wye Valley.
- **164 Scheduled Monuments** are widely dispersed across the County.
- **> 2,206 Listed Buildings** of which 2% are Grade I, 10% are Grade II \* and 88% are Grade II. There are multiple Grade I listed buildings located within the Primary Settlements (notably five in Chepstow, four in Monmouth and two in Abergavenny - including the Abergavenny Castle Ruins within the town centre). Usk also has four Grade I listed buildings, including Usk Castle and its precincts. Of the Listed Buildings, 166 (7.5% of the stock) are identified as being 'at risk'. The four communities with the highest percentage of listed buildings at risk based on the number of buildings are:
  - St Arvans - 12 buildings
  - Tintern - 9 buildings
  - Rogiet - 4 buildings
  - Llanbadoc - 4 buildings
- **10 Archaeologically Sensitive Areas (ASAs)** of which the largest extends across the south of the County, covering Caldicot, Rogiet, Magor Undy, and the Gwent Levels. There are also ASAs present at each of the Primary Settlements, Usk and Raglan, and rural locations outside of the main settlements.

Given the volume of heritage assets located throughout the County, it is considered that all of the Options are likely have an impact on the historic environment. It is considered that growth focussed at the Primary Settlements in the North through Options 1, 2 and 4 will result in increased pressure on the rich historic environment present at these locations; including notably the WHS and its setting, extensive Conservation Areas (all of which contain numerous Listed Buildings), Registered Parks & Gardens, and Grade 1 Listed Buildings, at Abergavenny, Chepstow and Monmouth. Together with their settings, these heritage assets require protection and enhancement, in accordance with the WHS Management Plan (2018), Conservation Area Appraisals and requirements of Planning Policy Wales (2018). It is therefore considered that directing significant growth to these locations has the potential for negative effects of greater significance, and reflects a likely greater need for suitable mitigation in development strategies.

It is noted that the redevelopment of brownfield sites in the Primary Settlements, i.e. through Options 1 and 2, and to a lesser extent Option 4, has good potential for positive townscape improvements. In this context, where proposals seek to deliver good, high quality design and appropriate layout, this may lead to landscape/ townscape improvements and positive effects such as increased awareness and access. This however is uncertain at this stage, and it is recognised that the County has a limited offer of brownfield land.

In terms of Option 3 it is considered that the South of the County is also sensitive in terms of the historic environment. Notably constraints include the ASA which extends across the M4 corridor; Portskewett, Caldicot and Major/ Undy contain Grade I Listed Buildings; Rogiet contains four listed buildings at risk; the Gwent Levels Registered Landscape of Outstanding and of Special Interest covers areas of Caldicot, Undy and Magor; and there are numerous Conservation Areas present. Focussing growth to the South therefore has the potential to adversely impact upon archaeological and/ or historic assets, their settings and intrinsic qualities. As discussed for other Options, development also has the potential to deliver neutral/ positive effects through having a positive contribution to an area's character or appearance. It is also noted that directing growth to the South of the County will preserve the historic environment in the remainder of the County, maintaining the historic landscape and setting of towns and villages, and protecting settlement identity.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. None of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Overall, it is difficult to rank the Options in terms of preference against this ISA Objective as they are all predicted to have a residual significant effect as they direct development to areas that are sensitive in terms of the historic environment; albeit in different areas of the County. It is considered that the significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

## Landscape

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
Rank	2	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain

Monmouthshire has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons in the north, and the river corridor of the Wye Valley in the east. In terms of nationally designated landscapes, the County incorporates:

- **Wye Valley National Landscape** located to the east of Monmouthshire. The part of the Wye Valley National Landscape located within Monmouthshire covers approximately 16% of the Monmouthshire LDP area.
- **Brecon Beacons National Park** located to the north west of Monmouthshire. The portion of the Brecon Beacons National Park (BBNP) located in Monmouthshire covers approximately 17% of the County.

In line with Planning Policy Wales (2024) it is recognised that the Wye Valley National Landscape and Brecon Beacons National Park are “valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.” In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out five Development Strategic Objectives, underpinning the aim to “Ensure all development within the AONB and its setting is compatible with the aims of AONB designation”. Notably, Objective WV-D2 seeks to “encourage and support high standards of design, materials, energy efficiency, drainage and landscaping in all developments”.<sup>51</sup> In terms of the Brecon Beacons National Park, there is an established Local Development Plan (LDP) in place and development management functions in the correlating part of the County. The LDP “represents and defines the National Park Authority’s approach for ensuring sustainable development is carried out in the National Park.”<sup>52</sup> While protection is provided at the higher level, it is nonetheless considered, given the level of growth proposed through all Options, that development has the potential to adversely impact upon special landscape features, character, and setting.

<sup>51</sup> Wye Valley AONB Joint Advisory Committee (2021) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2021 - 2026 <https://www.wyevalley-nl.org.uk/wp-content/uploads/Wye-Valley-AONB-Management-Plan-2021-26-finalised.pdf>

<sup>52</sup> Brecon Beacons National Park Authority (2019) Brecon Beacons National Park Local Development Plan (2018 – 2033) Preferred Strategy Consultation Document <https://www.beacons-npa.gov.uk/planning/draft-strategy-and-policy/local-development-plan-review/preferred-strategy/>

The focus of development in the Primary Settlements in the North through Options 1, 2 and 4 is anticipated to result in increased pressure on landscape character, setting, and the intrinsic qualities of the National Landscape and National Park. This is given Options 1, 2 and 4 direct a significant level of growth to Abergavenny which is located in close proximity to the National Park and Monmouth and Chepstow which are located in close proximity to the Wye Valley National Landscape.

Option 3 directs growth away from Monmouthshire's nationally designated landscapes, to the South of the County. This will likely reduce the potential for residual adverse effects through protecting these high quality landscapes, and directing growth to areas anticipated to be of higher capacity to accommodate new development, given the urban environment surrounding the M4 corridor. Additionally, directing growth along the M4 corridor will contribute positively towards the preservation of local landscapes throughout the remainder of the County and the rural areas, avoiding development in the open countryside and supporting sustainable patterns of development.

Overall, given Monmouthshire's rural nature and the landscape assets present, it is considered that Options 1, 2 and 4 are more likely to have a negative effect as a result of development in the North. In terms of ranking the Options, Options 1, 2 and 4 are considered worst performing given these Options direct the highest level of growth in close proximity to the National Landscape and National Park. Option 3 is best performing and unlikely to give rise to significant effects given it concentrates growth along the M4 corridor which is an urban area distant from the nationally designated landscapes located to the east and north west of the County. Given that the precise location of growth is not known and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have an uncertain effect at this stage.

## Climate change (including flood risk)

Options	Option 1 – Existing LDP Strategy	Option 2 – Proportionate growth	Option 3 – Focus on M4 corridor	Option 4 – Focus in north of County
<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Development proposed under any of the Options has the potential to incorporate renewable or low carbon energy, EV charging and smart infrastructure which can support more resilient community infrastructure. There are three substantial main rivers that pass through Monmouthshire, the Rivers Wye, Usk and Monnow and a number of smaller but significant ones are the River Trothy, Olway and Neddern. Monmouthshire is at risk from all types of flooding: surface water, ordinary watercourses, groundwater, rivers and the sea. Both the towns and rural areas are at risk from surface water flooding to various extents during heavy rainfalls. The terrain of the County with its hills,

valleys and plains is also at risk of flooding from watercourses. It is considered that the River Wye has the potential to affect more properties than the others.<sup>53</sup>

In line with the Flood Risk Regulations (2009), the Preliminary Flood Risk Assessment (PRFA) process has been carried out in order to establish the level of flood risk within the area. Subsequent to this, a Flood Risk Management Plan (FRMP) has been produced (2016) which sets out the findings of the PFRA.<sup>54</sup> The FRMP highlights that in terms of fluvial flood risk, communities at most risk from a 1 in 1000 year flood (Flood Zone 2) are Monmouth, Abergavenny and Usk. Communities most at risk of 1 in 1000 year surface flooding (Flood Zone 2) were Caldicot, Abergavenny, and Chepstow. Monmouth, Magor/Undy, Llanfoist Fawr, Usk, and Portskewett all feature as part of the top ten communities at risk from surface water flooding.<sup>55</sup> As such, directing growth to the most sustainable Settlements through Options 1, 2 and 4 have the potential to lead to long term negative effects, given these settlements have been identified as high flood risk areas. It is considered that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding.<sup>56</sup> To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.

Option 3 delivers growth to the South of the County, which is not identified through the FRMP as being significantly constrained in terms of fluvial flood risk, with only Magor/ Undy and Portskewett identified as at medium risk of surface water flooding. This Option is therefore likely to perform more positively than other Options, through delivering growth outside of areas at highest risk of flooding.

Overall, it is considered that Options 1, 2 and 4 perform less positively compared to Option 3 given they direct growth to locations vulnerable to flooding. It is however recognised that there is a level of uncertainty for all Options at this stage, and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level.

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<sup>53</sup> Monmouthshire County Council (2016) Monmouthshire County Council Flood Risk Management Plan <https://www.monmouthshire.gov.uk/app/uploads/2016/04/Flood-Risk-Management-Plan.pdf>

<sup>54</sup> Ibid.

<sup>55</sup> Ibid.

<sup>56</sup> Welsh Government (2004) Planning Policy and Guidance: Flooding – Technical Advice Note (TAN) 15: Development and Flood Risk <https://gov.wales/technical-advice-note-tan-15-development-and-flood-risk>

## Appendix D – ISA of strategic growth area options

Linked to Chapters 5 and 6, this appendix provides the detailed assessment of the strategic growth area options. Strategic growth areas have been identified in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

### Methodology

For each of the strategic options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1 in the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

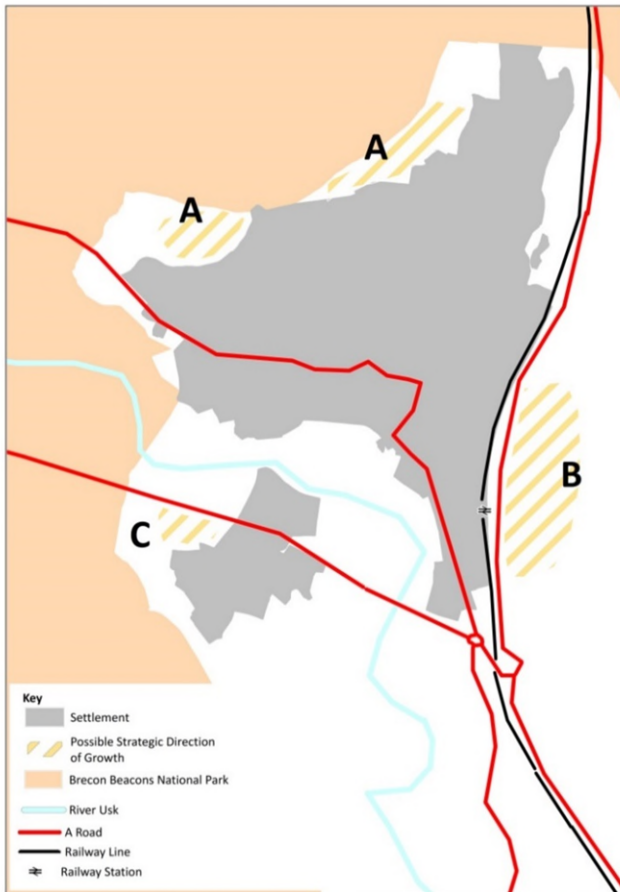
It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects. Cumulative effects are also considered (effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Monmouthshire County Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA topic compared to an option that is ranked 2 or 3 and so on.



## Abergavenny and Llanfoist options

- Option A: Land north of Abergavenny.
- Option B: Land to the east of the A465; and
- Option C: Land between the B4246 and Heads of the Valleys Road.



## Economy and employment

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Abergavenny plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Its location on the Heads of the Valleys road provides strategic links through its links to Brecon, Mid Wales and the wider Cardiff Capital Region; and the A465 separates the town from Llanfoist to the south. Options B and C to the east and west of the A456, respectively, are therefore considered to be less well connected to the town centre.

Abergavenny is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town; a number of which are protected employment sites. The largest protected employment sites at Union Street, Hatherleigh Place and Mill Street are located to the south west of the main settlement. These employment sites are reasonably accessible from all growth Options, with all Options required to cross the A40 or A465 for access, and would therefore likely be reliant on the car. However, it is noted that this part of the A40 is more residential with some pedestrian crossings already in place. Overall, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Abergavenny.

Option B performs most positively in terms of providing access to Abergavenny railway station which is located adjacent to the Option, to the west. Abergavenny railway station connects residents with employment hubs opportunities of the County including Newport, Cardiff, and the Midlands. Options A and C are both located 1.6 miles, or a 34 minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option A is considered best performing given it is reasonably well connected with the town centre and employment opportunities; and is not detached by the A465; as is the case for Options B and C. Option B performs more positively than Option C given it's distance to Abergavenny railway station, and would support the

uptake of sustainable travel to access employment opportunities outside of the County as long as suitable links to the railway station are delivered.

## Population and communities

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>

All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term positive effects are predicted in this respect.

There are however significant differences between areas of Abergavenny town, as reflected by the range in the average house prices. While some housing is amongst the most expensive in the County, Lansdown and Priory wards, which include the central area of the town northeast of the main shopping area, are much less desirable locations to live.<sup>57</sup> It is therefore considered that further growth to the north through Option A may lead to positive effects in terms of promoting regeneration in the north of the town, supporting the growth of existing communities and reinforcing Abergavenny's position in the settlement hierarchy as a Tier 1 Primary Settlement. It is however noted that Option A is approximately a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. While this is well connected comparatively with other Options it is noted that some residents (notably elderly and those with young children) may rely on the car for access.

Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the options from the town centre, approximately a 2.4 mile or a 57-minute walking distance. Option B is a similar walking distance to Option A however would involve crossing the A465. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to support sustainable communities.

While disconnected from the town centre, Option C nonetheless would be an extension of Llanfoist to the west of the town. As such it is considered that development at this location would lead to positive effects through integration with the existing sub-urban community,

<sup>57</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

providing a level of infrastructure to support the smaller settlement. Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.

Overall, Option A, followed by Option B perform most positively against this ISA theme as they are the most well connected with the town centre, its services and facilities, and sustainable travel. Option A is most likely to support the growth/ regeneration of Abergavenny as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.

## Health and wellbeing

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Monmouthshire has one main hospital, Nevill Hall Hospital in Abergavenny, which has a minor injury unit. Option A is 900m/ a 17-minute walk from the hospital. Option C is 1.2km from the hospital by car, however walking distance is 2.8 miles/ 58 minutes. Option B is the least well located, being over 3km from the hospital. In terms of GP surgeries, there are three located within Abergavenny, close to the town centre. Options A and B are within 1km / 18-minute walking distance of a GP surgery. Option C is considerably further from health facilities in the town centre, approximately 2.4km from Old Station Surgery. However, if travelling by car, Option C is also within 1km.

Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands, and good road links to Cwmbran, Newport, Monmouth and the motorway system. Option B is best performing in terms of access to the railway station, which is located adjacent to the site to the west. Options A and B are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links.

All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop unless new bus stops are provided, and Option C has access to a bus stop on the B424; however, this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre.

The town's proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

Overall, Options B and C perform on a par in relation to the Health and wellbeing ISA theme. Option A is best performing in terms of proximity to health services. Option A performs similarly to other options in terms of supporting healthy forms of transport to reach health (and wider) services/ facilities. Option A is less well located in terms of access to the train station; however, it is recognised that the Abergavenny circular bus service provides improved access to some extent.

## Equalities, diversity, and social inclusion

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>1</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Abergavenny is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Abergavenny will lead to positive effects on new and existing residents' quality of life, supporting regeneration and creating more positively integrated communities. It is however noted that Option B is detached from residential development by the A465, which may reduce potential for positive integration with existing communities.

It is noted that Abergavenny experiences high deprivation in areas. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting some of the most deprived communities through Options B and C, positive effects are likely to be enhanced to some degree. Option C seeks to positively expand upon Llanfoist village to the west of Abergavenny. While less deprived itself, Option A performs positively through reducing inequalities between sub-urban and urban areas.

Option A also performs most positively of the Options in terms of ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, especially those without access to private vehicles. Option C is least well

performing in this respect as is the furthest of the options from the town centre (2.4km). Option B is a similar walking distance to Option A; approximately a mile or a 20-minute walking distance.

Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, Option C is predicted to lead to positive effects of greater significance through targeting deprived areas; promoting equality and social inclusion through developing more inclusive communities. Option B performs least well of the Options given it is severed from the settlement by the A465, which may reduce potential for positive integration with existing communities.

## Transport and movement

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

In terms of the strategic transport network, Abergavenny is closely linked to the A465, and plays an important role on the Heads of the Valleys road through its links to Brecon, Mid Wales and the wider Cardiff Capital Region. While levels of self-containment are high in Abergavenny, there remains a reliance on the car as the primary mode of transport, and therefore traffic throughout the town is a significant issue. In addition to high levels of through traffic currently experienced, it is noted that a high percentage of the overall travel to work flows for the County would be to Abergavenny. All Options are well located in terms of access to the strategic transport network (the A465 extends east and west of the main settlement), and it is considered that development under all Options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

Access to sustainable transport throughout Abergavenny is good. Notably there are public transport links by rail and bus to Cwmbran, Newport, Cardiff and the Midlands. However, of the Options, only Option B is well located in terms of access to the railway station, being located adjacent to the site to the west. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. However, it is noted that Option B is separated from the town and the railway station by the A465 so development would need to provide suitable pedestrian links. All Options have relatively limited access to bus services given the edge of settlement locations. While Option A is located within 400m of a bus stop on Underhill Crescent, this is considerably distant from the northern extent of the site. Option B would require crossing the A465 to access a bus stop, and Option C has access to a bus stop on the B424, however this is also distant from the north east of the site which extends into the open rural landscape. It is however recognised that there is a regular bus service from the outskirts of

the settlement to the town centre; notably at Underhill Crescent which is accessible from Option A, improving access from the site to the railway station and town centre. Option B performs most positively overall given its location in close proximity to the railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within the town, and for wider commuter journeys.

The town’s proximity to the Brecon Beacons National Park makes walking, cycling and many other outdoor activities readily accessible, supporting active travel. Option B is best performing in this respect given its proximity to the National Park, and the Brecons Way bridle way located to the north of the growth area. It is also noted that positive effects are also anticipated through Option C, given its location adjacent to the Usk Valley Walk which extends along the Monmouthshire & Brecon Canal.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the Options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel. While Option B would arguably provide the greatest opportunity for residents to capitalise upon a range of sustainable transport options; located adjacent to the railway station, and with access to the Brecons Way bridle, it is considered that the separation of the option from the main settlement by the A465 may reduce its potential to encourage a modal shift. Options A and C are better located to the settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.

### Natural resources (air, land, minerals, and water)

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people’s health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point



infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option A is best performing in this respect, being a mile or a 20-minute walking distance from the town centre where shopping and employment opportunities are focussed. However, this is arguably not an achievable walking distance for all residents (notably the elderly and families with young children), with many people still likely to rely on the car for access. Options B and C are further detached from the town centre by the A465 to the east and west of the town, respectively. Option C is the furthest of the Options from the town centre, 2.4 miles away. Option B is a similar walking distance to Option A. Options B and C would therefore be more heavily reliant on the car to access the town centre than Option A, performing less positively in terms of potential to promote sustainable travel. Option B has the potential to encourage modal shift given it is located adjacent to the railway station; however, suitable pedestrian links would need to be delivered for crossing the A465. Options A and C are both located 1.6 miles, or a 34-minute walk from the station. Options B and A are therefore best performing in terms of potential to improve air quality in the town.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).<sup>58</sup> The area containing Option C was found to be entirely Grade 2, while the area containing Option B was found to be partially Grade 2 and partially Grade 3a. Option A was the only Option found to include an area of land that is not BMV, containing Grade 2 and 3b. Option A is therefore best performing in this respect, as it would necessitate the least amount of loss of BMV land. All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.

None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County's mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options perform negatively against this ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing of the Options as it may encourage active travel to some extent, given its location 1 mile from the town centre; and is the least constrained Option in terms of BMV agricultural land. Option B performs more positively than Option C as it is located adjacent to the railway station, which may encourage modal shift.

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<sup>58</sup> The Predictive ALC model for Wales (2019) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).



## Biodiversity and geodiversity

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
Rank	1	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

In terms of European sites, it is recognised that the HRA (2021) screening of the Preferred Strategy policies found that potential residential or employment sites in Abergavenny are likely to have nutrient neutrality implications for the River Usk SAC, because it is served by WwTWs discharging into the upper reaches of the SAC. Whilst solutions have now been identified (2024) mitigation will be required supported by RLDP policy provisions. All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated given the level of development is considered equal across all options.

In terms of differentiating between the Options, Option A is located 1km south of the Sugar Loaf Woodlands Special Area of Conservation (SAC), and Option C is located approximately 200m south of the River Usk SAC. Taking each European site in turn:

- **The Sugar Loaf Woodlands SAC** comprises 173.1ha of broad-leaved deciduous woodland (76.7%), and heath and scrub (23.3%). The site has been designated for its area of old sessile oak woods near the south-eastern fringe of the habitat's range. This is the largest in the UK and Europe.
- **The River Usk SAC** covers the length of the River Usk, to the west of the County, running through Abergavenny and Usk. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive; that are primary reason for designation. The River Usk SAC is part within the Brecon Beacons National Park Planning Area.

In addition to the water quality issue set out above, the HRA screening (2021) found that there is the potential for development to significantly affect the River Usk through recreation, and water quantity, level and flow. As such, this site and potential impact pathways will be considered in more detail through the Appropriate Assessment stage.

In terms of the Sugar Loaf Woodlands SAC, given the distance (more than 200m) from the nearest major road, adverse impacts are not anticipated on the site through atmospheric pollution. The SAC lies approximately 1km from the Strategic Growth Area of Abergavenny, indicating that it is likely to be within walking distance for new local residents. However, Natural Resources Wales' Core Management Plan

does not refer to recreational pressure as a potential management requirement for the site.<sup>59</sup> It is therefore concluded that there will be no likely significant effects of the Monmouthshire RLDP on the Sugar Loaf Woodlands SAC and the site can be screened out from Appropriate Assessment.

It is therefore considered that Option C performs most negatively in terms of potential impact on the River Usk SAC, given its close proximity. However, given the impact pathways identified, all Options have the potential to lead to adverse effects on the European site. It is however noted that effects may be less significant under Options A and B. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.

There is a range of nationally and locally designated biodiversity located around Abergavenny. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Usk SSSI through recreation, water quality and water quantity, level and flow. Option C performs most negatively in this respect given the proximity of the Option to the European designated site.

The Options are also constrained by Ancient Woodland, with a linear area located to the south/ east of Option A, and a significant area coinciding with Ysgyrd Fach hill to the east of Option B. It is considered that Options have the potential to adversely impact on these nationally important habitats (and associated species) through increased disturbance, noise, light and air pollution. This should be considered alongside the potential to possibly enhance these habitats and deliver significant positive effects. For example, development proposals could include the delivery of biodiversity net gain, creating ecological corridors between the woodland habitats and the Options.

The Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/mature trees extending through Options A and C, and along the field boundaries and along the A465 surrounding /within Option B. There is therefore potential for development across all Options to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all options have the potential to lead to long term significant negative effects as a result of nutrient neutrality implications for the River Usk SAC and the subsequent mitigation requirements. In terms of ranking the Options, given the presence of the River Usk SAC/ SSSI, Option C is worst performing of the Options, with the greatest potential for negative effects on biodiversity. However, given the impact pathways identified through the HRA for the SAC, it is considered that Options A and B also have the potential to impact upon the European

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<sup>59</sup> Countryside Council for Wales (2008) Core Management Plan for Sugar Loaf Woodlands SAC/SSSI  
[https://naturalresources.wales/media/674063/Sugar\\_Loaf\\_Woodlands\\_core\\_management\\_plan\\_Mar\\_2008%20A\\_.pdf](https://naturalresources.wales/media/674063/Sugar_Loaf_Woodlands_core_management_plan_Mar_2008%20A_.pdf)

designated site; however, effects are likely to be less significant. Options A and B are also constrained in terms of potential indirect effect on Ancient Woodland; while all Options are constrained in terms of potential adverse effects on habitats present within/ surrounding the Options (i.e., through habitat loss and recreational disturbance). It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

## Historic environment

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Option A is located to the north of Abergavenny and would extend the existing built-up area toward the boundary with the Brecon Beacons National Park. Development would be in close proximity to the northern boundary of the Abergavenny Conservation Area and a number of listed buildings. It is assumed development would not extend beyond Pentre Lane or Deri Road into the National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the National Park and the Conservation Area. However, this is uncertain at this stage.

Option B is located to the east of the A465 and apart from some listed buildings near the train station, it's not in close proximity to any designated heritage assets. However, as you move further away from the town and the A465 the elevation increases, and development is likely to be become more visible from the settlement and the World Heritage Site (WHS) and National Park across the town. Furthermore, in terms of the wider historic environment this option would extend the built area beyond the A465, a natural barrier to the town for many years, into the countryside. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed, and the layout takes account of any important views into and from heritage assets within and beyond the settlement. However, this is uncertain at this stage.

Option C is located to the north west of Llanfoist, between the B4246 and the Heads of the Valleys Road. It would extend the built-up area to the boundary with the Brecon Beacons National Park as well as the Blaenavon Industrial Landscape WHS. Additionally, there are two listed buildings in close proximity to the growth area. It appears that the majority of the growth area sits at a lower elevation than the WHS, National Park and the Heads of the Valley Road. As a result, development is unlikely to significantly affect any views in or out from the WHS or the National Park. Development could affect the setting of a Grade II listed building (Glan nant-y-llan) on Church Lane but it's

possible that development could avoid the area in the south east adjacent Church Road, which is slightly more elevated and therefore more visible in terms of the WHS and National Park. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long as it is sensitively designed and the layout takes account of any important views into and from the National Park, WHS and the listed building off Church Lane. However, this is uncertain at this stage.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Given uncertainties no significant differences between the options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the setting of designated heritage assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect proximity to designated heritage assets. While there are a significant number of uncertainties at this stage, Option B is considered to be less sensitive in terms of the historic environment compared to the other options. Development at Option A and particular Option C are more likely to affect internationally and nationally designated heritage landscapes and natural landscapes that have shaped development over time and contribute to the character of the area and settlement identities. By its proximity to the WHS as a significant heritage asset, development under Option C is least preferred.

## Landscape

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>3</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Uncertain</b>

As a largely rural County, Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Abergavenny, the built-up area to the north and west extends close to the Brecon Beacons National Park (BBNP) boundary and Llanfoist adjoins the Blaenavon World Heritage Site (WHS). In line with Planning Policy Wales (2018) it is recognised that these designated assets are “*valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.*”<sup>60</sup> In addition to national policy requirements, protection is also provided to the Brecon Beacons

<sup>60</sup> Welsh Government (2018) Planning Policy Wales

National Park through the established Local Development Plan in place and development control functions in the correlating part of the County. In terms of the WHS, the Blaenavon WHS Management Plan (2018) identifies an overall vision and key principles for the management of the WHS.<sup>61</sup>

While protection is provided at the higher level, it is nonetheless considered that Options A and C have the potential to adversely impact upon special landscape features, character and setting of the BBNP and WHS. Development to the north through Option A and to the north west of Llanfoist through Option C, would expand the existing built up area toward the boundary with the BBNP; and Option C also has the potential to adversely impact upon the setting of the WHS. It is however possible that Options could accommodate development without any significant residual negative effects on the landscape as long it is sensitively designed, and the layout takes account of any important views into and from the BBNP and WHS. However, this is uncertain at this stage.

It is also noted that Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>62</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Abergavenny. However, looking specifically at the Options in turn:

- **Option A** is categorised as being of high/medium landscape sensitivity to residential development.
- **Option B** is categorised as having high/medium landscape sensitivity to residential development.
- **Option C** is categorised as having medium landscape sensitivity to residential development.

Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the intrinsic qualities, character and setting of designated landscapes/ assets depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) findings. Option C is therefore identified as best performing given it is the only Option with 'medium' sensitivity to residential development; however, this Option still has the potential to result in significant negative effects. Option A is worst performing given the potential impact on the BBNP; its open character and hillside setting. It is however noted that for all Options, mitigation (which

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<sup>61</sup> Chris Blandford Associates (2018) Blaenavon Industrial Landscape World Heritage Site Management Plan 2018 - 2023

<sup>62</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

## Climate change (including flood risk)

Options	Option A – Land north of Abergavenny	Option B – Land east of the A465	Option C – Land between B4246 and Heads of the Valleys
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all options perform equally in this respect.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement, with good public transport links connecting residents with employment and services within and outside the County; notably Cwmbran, Newport, Cardiff and the Midlands. Option B arguably provides the greatest opportunity for residents to capitalise upon a range of sustainable transport options given its location adjacent to Abergavenny railway station. However, it is considered that the separation of the Option from the town centre by the A465 may result in heavy reliance on the car for primary mode of travel. Options A and C are better located to the

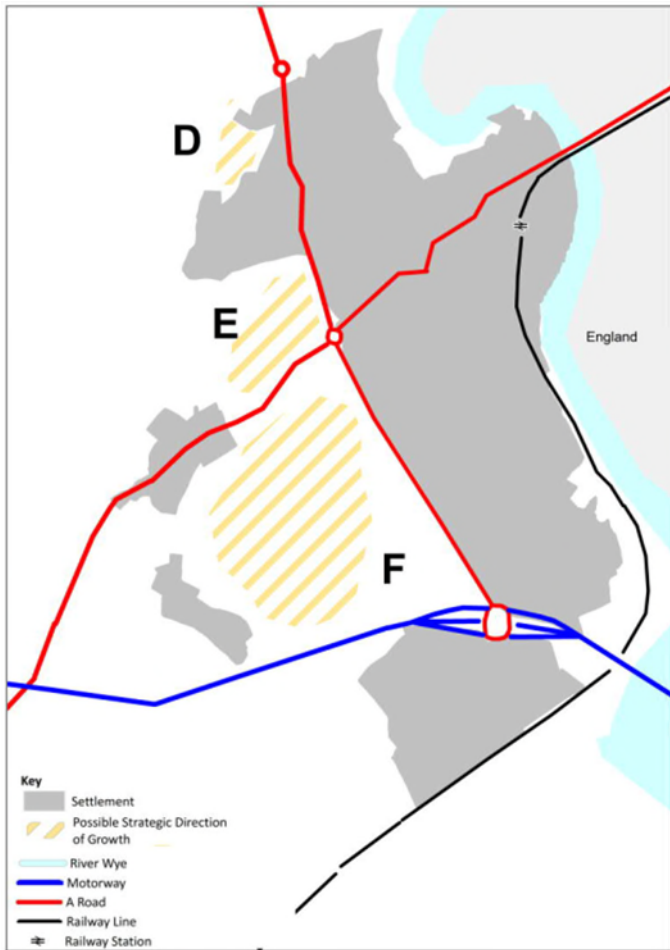
settlement and bus services, but less well located in terms of the railway station. It is therefore concluded that Options cannot be differentiated between at this stage.

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Usk is a constraint to the south of the town and in parts of Llanfoist. Looking specifically at the Options, Option B is located within Flood Zone A, and is not at risk of flooding. However, Option C is at high risk of flooding, with a proportion of the Option located within Flood Zones B/ C. Option A includes a very small area within Flood Zones B/ C; extending north to south in the centre of the Option. It is however noted that development under Options B and C could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, however given the presence of the A465 may result in increased reliance on the car for primary mode of travel. As such, effects on climate change in this respect are uncertain. Option C is worst performing of the Options, given that a significant proportion of Option C is located within Flood Zones B/C, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15.

## Chepstow options

- Option D: Land north of the Bayfield Estate.
- Option E: Land between the Bayfield Estate and A48; and
- Option F: Land between the A48 and M48.





## Economy and employment

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Chepstow plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. Of all of the settlements appraised in the Sustainable Settlement Appraisal (December 2022) it achieved the second highest weighted score, not far behind Abergavenny. Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England and associated economic opportunities. These opportunities have been enhanced given the recent removal of the Severn Bridge Tolls. Option F is arguably best located in this respect, given its location adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west.

In terms of facilities and services present, the town centre has a relatively large number and good range of shops and restaurants and is a vibrant focus for the surrounding area. Option E is best performing in terms of access to the town centre, being less than a mile or a 15-minute walking distance. Option D is approximately 1.3km or a 15-minute walk from the town centre, while Option F is furthest away from the town centre at approximately 1.4 miles or a 29-minute walk.

Chepstow is also one of the main focuses of employment within the County. Chepstow has a good range of employment sites within the town, with the largest being the Newhouse Farm Industrial Estate located to the south of the town on the motorway junction with the M48. In terms of access to this employment site, Option F is best performing, being located to the southwest of the settlement, with Option D worst performing being located furthest north. Nonetheless, all Options perform positively in terms of providing good access to local employment sites, supporting levels of self-containment in Chepstow.

It is also noted that a high percentage of residents cross the River Severn daily to work in Bristol. Option F is therefore best performing in terms of access to the Severn Bridge and M48, supporting access to wider employment opportunities outside of the County.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Although least well connected with the town centre, Option F is considered best performing given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town.

## Population and communities

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>

All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

There are significant differences between areas of Chepstow as reflected by the range in the average house prices; St Kingsmark ward has the highest prices and St Christopher ward the lowest.<sup>63</sup> It is therefore considered that further growth to the south of Chepstow through Option F may lead to positive effects in terms of promoting regeneration in the south of the town, expanding upon the existing town centre/ retail uses and increasing the potential customer base. This would likely lead to further positive effects in terms of promoting the growth/ regeneration of existing communities and reinforcing Chepstow's position in the settlement hierarchy. However, it is noted that Option F is detached to some extent from the main built up area by the A466, and may not integrate well with the existing community. Option F may also negatively impact upon the identity of smaller, distinct communities in the open countryside to the west of the main settlement, notably between Chepstow and Pwllmeyric and Mathern. Option E may also perform negatively in this respect, between Chepstow and Pwllmeyric. Conversely, however, directing growth to smaller, suburban settlements would likely promote sustainable communities; improving access to the motorway and railway station for employment, wider services and facilities. Options D and E would extend the built up area of Bayfield to the north and south, respectively. Development at this location would likely more positively integrate with the existing community, providing a level of infrastructure to support the settlement and improve connections with the main town centre to the east.

<sup>63</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>

Overall, it is not considered possible to differentiate between the options at this stage. All options perform positively in terms of supporting the growth/ regeneration of Chepstow as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands.

## Health and wellbeing

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

Chepstow does not include a hospital; however it is supported by Chepstow Community Hospital which includes two GP practices; Mount Pleasant and Town Gate surgeries. Chepstow Community Hospital is located to the west of the settlement, adjacent to the A466. In terms of access to the Community Hospital and associated GP surgeries, Option E is best performing, followed closely by Option D, with Option F least well performing. However, all Options are within 1 mile of the Community Hospital and therefore considered to have good access to health services. For wider hospital services (i.e. A&E and Minor Injuries Unit), The Grange University Hospital in Cwmbran, which is the main hospital in the area, is approximately 34.4km from Chepstow, and there is also the Royal Gwent Hospital located in Newport; 18 miles from Chepstow, respectively. Option F is best located in terms of access to wider hospital services to the east and west, given the close proximity to the M48, to the south of the Chepstow.

Being located close to the M48, Option F also has the potential to perform negatively against this ISA theme as a result of potential impacts on residents’ health (i.e. through atmospheric and noise pollution). The Department of Transport’s Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466, however this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.

Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to distinguish between the Options at this stage, with all options providing residents with good access to health services and supporting active travel.

## Equalities, diversity, and social inclusion

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Chepstow is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. Chepstow experiences slightly higher levels of deprivation, as highlighted above, development at all Options will support equal, sustainable communities, notably with improved accessibility to services to address deprivation; but also through access to employment and affordable housing.

In addition to addressing higher levels of deprivation, directing growth around Chepstow will lead to positive effects in terms of improving access to services for vulnerable or immobile groups in the community (particularly elderly residents and young families). Option E is likely to deliver positive effects of greatest significance in this respect given Option E is most well connected with Chepstow town centre. This is followed by Option D, and subsequently Option F, which is approximately 1.4 miles or a 29 minute walk from the town centre. All Options also perform well through reducing inequalities between sub-urban and urban areas, expanding upon Bayfield, Pwllmeyric, Mounton and Newton Green to the west of Chepstow.

Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. All Options will also support integration between urban and sub-urban communities, reducing inequality. In terms of ranking the Options, Option E performs most positively given it is most well connected to the town centre, providing access for vulnerable groups and supporting improved levels of deprivation. Option F performs least positively overall given its distance from services in the town centre, which may exacerbate deprivation levels in this respect.

## Transport and movement

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

In terms of the strategic transport network, Chepstow is well placed on the M4 corridor at the entrance to Wales to capitalise on its strategic road and rail links to the Cardiff Capital Region and South West England. It is also recognised that the recent removal of the Severn Bridge Tolls has enhanced accessibility in this respect. Given its location adjacent to the M48, Option F is arguably the most well located of the Options, connecting with the M4 and Newport/ Cardiff to the south west.

While levels of self-containment are high in Chepstow, there are consequently substantial daily flows of commuters to and from the town, with levels of car reliance high. The A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48, connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

While it is recognised that the car is the primary mode of travel throughout Chepstow (utilising the M4 corridor as set out above), Chepstow benefits from active travel routes, an existing railway station and frequent bus services. Notably there are public transport links by bus to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all Options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18-minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all options may increase traffic through the town, leading to adverse effects on air quality and the Chepstow AQMA, it is recognised that Options perform positively in terms of promoting the uptake of sustainable travel.

## Natural resources (air, land, minerals, and water)

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, this is particularly apparent through the Air Quality Management Area (AQMA) present at Chepstow (and another at Usk). Chepstow AQMA is located in the centre of the town, encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace. Chepstow AQMA was designated in 2007 for levels of NO<sub>2</sub>; predominately caused by vehicle emissions from through traffic in the town centre. Options E and F are located adjacent to the AQMA, to the west of the A48 and the A48/ A458 roundabout. It is therefore considered that new development at these Options would lead to increased vehicular use within the AQMA, resulting in heightened levels of NO<sub>2</sub>, and an overall adverse effect on air quality. While Option D is located further from the AQMA, to the north west of the town, residents will have to travel in to the AQMA to access services and facilities within Chepstow town centre, contributing to air quality issues. Negative effects are therefore predicted for all Options.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC grades at each of the Options has been based on predictive mapping. The area containing Options D and E were found to be entirely Grade 2, while the area containing Option F was found to be predominately Grade 1 with smaller areas of Grade 2 and Grade 3a. All Options therefore perform equally, given all are wholly located within BMV agricultural land, leading to the permanent loss of this resource. All Options also comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land.

All Options are considered to perform equally in terms of demand for water, and impact on water quality. All of the Options fall within the limestone minerals safeguarding area, and therefore also perform equally in terms of impact on the County's mineral resource.

Overall, all Options are considered to perform equally against this ISA theme. Options are anticipated to have long term negative effects through increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.

## Biodiversity and geodiversity

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of European sites, the Wye Valley Woodland SAC is located 600m east of Option D, 900m east of Option E, and 1.2km north east of Option F. The River Wye SAC is located 800m east of Option D, 1km east of Option F, and 1.5km east of Option E. Taking each SAC in turn:

- **The Wye Valley Woodland SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.
- **The River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.

HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Wye Valley Woodland SAC through atmospheric pollution; and for development to affect the River Wye SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow. As such, the European sites, and their potential impact pathways, will be

considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process.

There is a range of nationally and locally designated biodiversity located around Chepstow. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow; and to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

All Options are also constrained by Ancient Woodland:

- Bishops Barnet Wood and Great Barnet Wood is 100m northeast of Option D;
- A small area of Ancient Woodland is located north of Option E, south of Mounton Road; and
- There are two distinct areas of Ancient Woodland located within Option F, including East Wood.

There is the potential for development at Option F to have a significant negative effect on biodiversity through direct loss of this important habitat and associated species, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Effects are likely to be indirect through Options D and E given the proximity to the habitats. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing habitats where possible; delivering biodiversity net-gain. This may include creating ecological corridors and connecting biodiversity sites, notably through Option F.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are patches of hedges/ mature trees to the north and south west of Option E, and there are sparse hedges and areas of dense vegetation dispersed through Option F; in addition to the Ancient Woodland discussed above. There is the potential for development across Option F, and to a lesser extent Option E, to lead to negative effects on biodiversity through direct loss of these habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain.

Overall, all Options have the potential to lead to adverse effects on biodiversity, given the presence of the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and River Wye SAC/ SSSI to the east of the settlement. It is difficult to differentiate the Options in terms of impacts on the European designated sites given the impact pathways identified; although it is noted that Option D is considerably closer to the Wye



Valley Woodlands than Option F and is considerably closer to the River Wye than Option E; with the potential for increased significance of effects. In terms of wider biodiversity effects, it is considered that Option F is worst performing given the areas of Ancient Woodland (and other habitats and associated species) present within the Option. Options D and E are less constrained in terms of habitats present at the Options, however, are located in close proximity to Ancient Woodland, with the potential for residual indirect negative effects. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

## Historic environment

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Yes - Negative</b>

Option D does not contain any designated heritage assets within the growth area. Bishop Barnet's Wood Camp Scheduled Monument is situated approximately 300m to the west from the edge of the growth area. There is also a Grade II listed building (Lion Gates and attached Lodges at Chepstow Racecourse) situated to the north east across the A466. Key considerations in terms of the historic environment for growth in this area will be impacts on the scheduled monument, which comprises the remains of an earthwork enclosure and it forms an important element within the wider later prehistoric context and within the surrounding landscape. It's possible that the site could accommodate development without any significant residual negative effects on the scheduled monument and wider historic environment as long it is sensitively designed; however, this is uncertain at this stage.

Option E does not contain any designated heritage assets but there are three listed buildings in close proximity, one to the north close to Mounton Road and two to the south on the other side of the A48. The growth area is adjacent to the Mathern Conservation Area and is approximately 600m from the Mounton Conservation Area and a cluster of listed buildings that lie within it to the west. It's possible that the site could accommodate development without any significant residual negative effects on the Conservation Areas if development does not extend beyond St Lawrence Lane and it is sensitively designed with appropriate screening, and the layout takes account of views into and from the conservation areas. Another consideration in terms of the historic environment for growth in this area will be impacts on the St Lawrence House Grade II Listed Building in the north and it is likely that its setting would be affected by development in this area.

Option F contains 16 listed buildings and is located entirely within the Mathern Conservation Area. Development within this growth area would result in the loss of large areas of greenfield/ open space within the Mathern Conservation Area and around the listed buildings

present. There is the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area; however, there is some uncertainty at this stage.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Overall, Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage; however, they are considered to be less likely to result in residual significant effects compared to Option F.

## Landscape

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

As a largely rural County Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Chepstow, the area immediately north of the town lies within the Wye Valley National Landscape (formerly Area of Outstanding National Beauty (AONB)). Planning Policy Wales (2018) gives National Parks and AONBs equal status in terms of landscape and scenic beauty, recognising that these designated assets should be *“valued for their intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.”*<sup>64</sup> In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021). While protection is provided at the higher level, it is nonetheless considered that Options D and E have the potential to adversely impact upon the National Landscape (AONB), its special landscape features, character and setting.

<sup>64</sup> Welsh Government (2018) Planning Policy Wales

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is also noted that land to the west of the A466 is currently protected by a 'Green Wedge' policy to ensure the town's physical separation from Pwllmeyric and Mathern. Part of Option E (the area between Mounton Road and the A48) and part of Option F (the area between the A48 and the M48) falls within the Green Wedge. It is considered that development at this location could lead to coalescence between Chepstow and Pwllmeyric (under Option E) and Chepstow and Pwllmeyric and Mathern (under Option F).

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>65</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Chepstow. However, looking specifically at the Options in turn:

- **Option D** is categorised as being of medium landscape sensitivity to residential development.
- **Option E** is a mixture of medium and high/medium landscape sensitivity to residential development.
- **Option F** is categorised as high landscape sensitivity to residential development

Overall, all Options are particularly sensitive in terms of the landscape, with the potential for significant long term negative effects. Depending on the design and layout of development, Options D and E could potentially affect the intrinsic qualities, character and setting of the National Landscape (AONB), while Option F could impact upon the sensitivity of the settlement itself; being located on sloping parkland/ and partial designation as a 'Green Wedge'. In terms of ranking the Options, assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the National Landscape (AONB). For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

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<sup>65</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

## Climate change (including flood risk)

Options	Option D – Land north of Bayfield Estate	Option E – Land between Bayfield Estate and A48	Option F – Land between A48 and M48
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

Monmouthshire’s rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council’s aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e. given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel, and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards a Tier 1 settlement with good public transport links connecting residents with employment and services within and outside the County; notably bus services run to Cwmbran, Chepstow circular, Pontypool and Monmouth. All Options have access to a bus stop on the A466; however, this is distant from the western extent of all options, which are relatively distant from the settlement in the open rural landscape. All Options are also a similar distance from Chepstow railway station (1 mile/ 18 minute walk), located on the other side of the settlement, to the east. Chepstow railway station connects residents with the wider south west Wales region and the midlands; including Newport, Cardiff, Birmingham, and Nottingham. However, the A48, which provides the main link between the southern part of the Forest of Dean and the motorway network, passes through the town and creates congestion problems; with part of the route also designated as an Air Quality Management Area (AQMA). All Options are well located in terms of access to the strategic road network, with Option F notably located adjacent to the M48,

connecting with the M4 and Newport/ Cardiff to the south west. As such, it is considered that development under all Options has the potential to result in increased vehicular use in and around Chepstow.

In terms of managing flood risk to address climate change, while it is recognised that the east of the town is constrained by the River Wye, all Options are located to the west of the Chepstow and therefore are at low risk of flooding.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk, and seek to support the uptake of sustainable travel where possible. However, the presence of the A48 (and connectivity with the M48 and M4 corridor), may result in increased reliance on the car for primary mode of travel, exacerbating air quality issues in the centre of the town and within Chepstow AQMA. As such, residual effects on climate change are uncertain.

## Monmouth options

- Option G: Land west of Monmouth.
- Option H: Land in central Monmouth; and
- Option I: Land north-east of Monmouth.



## Economy and employment

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Monmouth plays a significant economic role in the County, being identified as a Primary Settlement in the RLDP settlement hierarchy. It has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466) and has a range of bus services to the South Wales cities and to Gloucestershire and Herefordshire. Option I notably has good access to the A40 and A466.

In terms of facilities and services present, Monmouth scores well within the settlement appraisal, given its relatively large number and good range of shops and restaurants, and is a vibrant focus for the surrounding area. Option H performs most positively in this respect, being centrally located and approximately 0.5 miles / 11-minute walk from town centre. Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk. Option G would likely rely on the car for day-to-day access to services and facilities in the centre, via the A40/ A466.

Monmouth is one of the most self-sufficient settlements in terms of employment with a variety of employment sites within the town. Monmouth's largest employment area is an Industrial Estate to the South West of the settlement. There has also been recent strategic growth to the south west of the town with a mixed-use development to the west of the Wonastow Estate allocated under the current LDP, which is near completion. In terms of access to employment to the southwest of the town, Option G is best performing, being located adjacent to employment focussed along Wonastow Road. There is also opportunity for Option G to extend upon the existing Wonastow industrial estate. Option H is located 1.1 mile/ 23-minute walk from Wonastow Road, while Option I is least well performing of the Options in this respect, being located 1.8 miles/ 36-minute walk from employment opportunities to the south of the town. Residents at Option I would therefore likely be reliant on the car for access. Nonetheless, all Options perform positively in terms of providing access to local employment sites, supporting levels of self-containment in Monmouth.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all options would be able to deliver a similar level of infrastructure, and therefore

options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all options are anticipated to lead to long-term positive effects against this ISA theme. Option H is best performing as it is most centrally located in terms of access to the town centre, its services and facilities, and is within reasonable distance of employment opportunities to the south of the town. Option G also performs well given its location adjacent to the Wonastow Estate employment site; however, it is most distant from the town centre. Option I is reasonably well located in terms of the town centre but performs poorly in terms of access to Wonastow Estate.

## Population and communities

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>1</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>

All options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

There are significant differences between areas of Monmouth as reflected by the range in the average house prices; Dixton with Osbaston ward has the highest house prices and Wyesham ward the lowest.<sup>66</sup> All Options direct growth to the north of the A40, away from Wyesham which is located to the south of the town. Option I is located in close proximity to Dixton, to the north east of the Option.

All Options have the potential to support the growth of existing communities; however, this is likely to be more achievable through Options H and I, given their location in terms of access to the town centre (0.5 miles/ 11-minute walk from Option H, and 0.7 miles/ 13 minute walk from Option I). Notably Option H would extend existing built form at Over Monnow, while Option I would extend the suburb of Obaston to the north east of Monmouth, supporting regeneration at these locations. Option G is arguably more isolated in this respect, being less well connected to the town centre (1.4 miles and a 28-minute walk). Nonetheless, all Options would likely integrate positively with existing communities present, providing a level of infrastructure to support the sub-areas and improve connections with Monmouth town centre.

<sup>66</sup> Monmouthshire County Council (2018) Final Local Housing Market Assessment <https://www.monmouthshire.gov.uk/app/uploads/2019/05/Final-Local-Housing-Market-Assessment-September-2018.pdf>



Benefits in this respect may include improved access to facilities, services, and potential improvements to highways/ public transport infrastructure.

Overall, it is considered that all Options perform positively in terms of supporting the growth/ regeneration of Monmouth as an attractive Tier 1 settlement, supporting vibrant communities both within the town and the wider hinterlands. In terms of ranking Option G performs least well given its distance from the town centre, services and facilities. It is not possible to differentiate between Options H and I at this stage, as both connect well with the town centre and existing communities on the outskirts of the settlement.

## Health and wellbeing

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>1</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Monmouth does not include a hospital, however it is supported by Monnow Vale Community Hospital (Monnow Vale Integrated Health and Social Care Facility). This specialist hospital provides a range of Health & Social Care needs to people over the age of 65, and also includes access to many specialist Clinics. Option H is best located in terms of access to the Community Hospital, followed by Option G, with Option I least well performing, located 1.3 miles/ 28-minute walking distance away. All Options therefore have good access to the Community Hospital. In terms of GP surgeries, there are two located within Monmouth; Dixton Surgery and Castle Gate Medical Centre. Option I is 800m/ 18-minute walk from Dixton Surgery, while Options G and H are a 900m/ 18 minute walk, and a 0.7 mile/ 14 minute walk from Castle Gate Medical Practice, respectively. All Options therefore perform positively in terms of access to local health facilities. Given the specialist nature of Monnow Vale Community Hospital, it is considered that residents would travel to Nevill Hall Hospital in Abergavenny for wider hospital services. All Options are approximately 18 miles from Nevill Hall Hospital.

Access to sustainable transport throughout Monmouth is reasonable; Monmouth has excellent road links occupying a key strategic location on the road network between Newport (A449), Abergavenny (A40) and the Midlands (A466), which is likely to be utilised by residents. Option I notably has good access to the A40 and A466. There is no railway station located within Monmouth; the nearest being Abergavenny railway station, approximately 16 miles west of all Options. Monmouth does however have a range of bus services which connect residents with the South Wales cities and to Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixton Road.

The town is in close proximity to Kings Wood to the west, and it is noted that Option G is adjacent to the Offa's Dyke Path along Watery Lane, which connects the Option to the Wood. Option G therefore performs positively in terms of access to walking and cycling, in addition to recreational activities at Kings Wood.

Overall, all Options perform positively in relation to the health and wellbeing ISA theme. It is difficult to differentiate between the Options at this stage, with all options providing residents with good access to health services and supporting accessibility by healthy forms of transport.

## Equalities, diversity, and social inclusion

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

Monmouth is defined as a Tier 1 settlement, and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. This will likely positively address existing demographic issues, encouraging younger people to reside and work in the County. It is predicted that growth around Monmouth will lead to positive effects on new and existing residents' quality of life, creating more positively integrated communities.

None of the options fall within areas of significantly high deprivation. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing. However, it is considered that by targeting more deprived communities through Options G and H (albeit not significantly more deprived), positive effects are likely to be enhanced to some degree. It is recognised that Option G also has the potential to deliver positive effects through reducing inequalities between sub-urban and urban areas, expanding upon Over Monnow, the sub-urban part of Monmouth. Over Monnow is located to the west of the River Monnow and the Monnow Bridge and identified as the third most deprived LSOAs in Monmouthshire (Overmonnow 2, ranked 520). Option I is also likely to lead to positive effects in this respect, directing growth towards rural Dixton village, located 1 mile north east of Monmouth.

In terms of ensuring access to services for more vulnerable or immobile groups in the community, such as elderly residents and young families, Option H performs most positively. This is given its central location adjacent to the town centre (approximately 0.5 miles /11-minute walk away). Option I is also considered to have good access to the town centre, its amenities and facilities, being approximately 0.7 miles or

a 13-minute walking distance. Option G is furthest from the town centre and therefore worst performing of the Options, at approximately 1.4 miles and a 28-minute walk.

Overall, it is considered that all Options perform positively against this ISA theme. Options will support the growth of and regeneration of existing communities, improving access to housing, jobs and services. In terms of ranking the Options, Option G and H are likely to deliver positive effects of greater significance than Option I as growth is targeted towards more deprived areas. Option H however is best located in terms of supporting vulnerable groups with access to services in the town centre, and Options G and I perform well through reducing inequalities between sub-urban and urban areas to the north and southeast of the town. It is therefore not considered possible to differentiate between the Options at this stage.

## Transport and movement

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	No	No	No

In terms of the strategic transport network, Monmouth occupies a key location on the road network, with strategic links between Newport (A449), Abergavenny (A40) and the Midlands (A466). While levels of self-containment are high in Monmouth, there remains a reliance on the car as the primary mode of transport, with high levels of through traffic highlighted as a significant issue for the town. Option I is best located in terms of access to the strategic road network; notably being nestled between the A40 and A466. Options G and H have good access to the A40, to the east. It is considered that development under all options is likely to result in increased vehicular use in the town with the potential for long term adverse effects.

Access to sustainable transport throughout Monmouth is reasonable. Although the town is not connected to the rail network (the nearest being Abergavenny railway station, approximately 16 miles west of all Options), it has good bus services to the South Wales cities and into Gloucestershire and Herefordshire. All Options are within 400m of a bus stop; in terms of Option G, the nearest bus stop is along Wonastow Road, 400m from the northern extent of the site. In terms of Option H, there is a bus stop adjacent to the site along Rockfield Road, and similarly for Option I, there is a bus stop adjacent to the site along Dixon Road.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform similarly against this ISA theme, directing growth towards a Tier 1 settlement, with good access to the strategic transport network. While all Options may increase traffic through the town, it is recognised that Options are well located in terms of the bus network which is well connected with wider service centres. Option I is worst performing of the Options given its location between two A-roads which currently experience high levels of traffic and congestion at peak times. However, it is considered that all Options would utilise the strategic road network to some extent, particularly given the absence of a railway station. It is therefore considered that Options cannot be differentiated between at this stage.

## Natural resources (air, land, minerals, and water)

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
Rank	1	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. All Options are considered to perform equally in this respect, given all Options direct growth towards a Tier 1 settlement, with good access to the strategic transport network and town centre; supporting modal shift to reduce reliance on the car and subsequently reduce NO<sub>2</sub> emissions. However, given the absence of a railway station and the strategic road links to Newport (A449), Abergavenny (A40) and the Midlands (A466), there is likely to be a continued reliance on the private vehicle for travel.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options

has been based on the Predictive ALC model for Wales (2017).<sup>67</sup> The area containing Option I was found to be entirely Grade 2, and the area containing Option H was found to be entirely Grade 3a. The area containing Option G however was found to be partially Grade 3a and partially Grade 3b. Option G is therefore best performing of the Options, given it includes a reduced amount of BMV agricultural land.

All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Option G is best performing in relation to protecting the County’s soil/land resource.

None of the Options fall within, or within close proximity to a mineral safeguarding area, and therefore all perform equally in terms of impact on the County’s mineral resource. All Options are also considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options are considered to perform equally in terms of impact on air quality, and the County’s mineral and water resource. However, all Options perform negatively against this ISA theme overall with the potential for significant effects, as all Options would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. In terms of ranking the Options, Option G is best performing given it is the least constrained Option in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

## Biodiversity and geodiversity

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

In terms of European sites, it is recognised that the HRA screening (2021) of the Preferred Strategy policies found that potential residential or employment sites in Monmouth, are likely to have nutrient neutrality implications for the River Wye SAC, because they are served by WwTWs discharging into the upper reaches of the SAC. Whilst a solution has now been identified (2024), mitigation will be required

<sup>67</sup> The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

(supported by RLDP policy provisions). All options therefore have the potential to lead to long term significant negative effects in this respect, and options cannot be differentiated between given the level of development is considered equal across all options.

In terms of differentiating between the options, the River Wye SAC is located approximately 600m east of Option I, approximately 1.2km east of Option H, and 1.4km east of Option G. Option I is also within 800m of the Wye Valley Woodland SAC. Taking each SAC in turn:

- **The River Wye SAC** covers the length of the River Wye, to the north east of the County, notably extending through Monmouth. The SAC contains habitats listed under Annex I of the Habitats Directive and a variety of species listed under Annex II of the Habitats Directive which are also the primary reasons for designation. The River Wye is important for its population of Atlantic salmon, and whilst stocks have declined the salmon population is still of considerable importance in UK terms. The Wye also holds the densest and most well established otter population in Wales. The site is considered one of the best in the UK for white-clawed crayfish. Other important species supported by the River Wye are twaite shad, bullhead and river, sea and brook lamprey.
- **The Wye Valley Woodland SAC** is a large woodland SAC that straddles the Wales-England border, extending along the east of the County. The site is underpinned by nine SSSIs in Wales and seven in England. The Wye Valley contains abundant and near continuous semi-natural woodland along the gorge. The variety of woodland types found are rare within the UK.

In addition to the blanket water quality issue highlighted above for all options, the HRA Screening (2021) found that there is the potential for development to significantly affect the River Wye SAC through atmospheric pollution, recreation, and water quantity, level and flow, and for development to affect the Wye Valley Woodland SAC through atmospheric pollution. As such, these sites and their potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SACs. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. Given the proximity of Option I to both SACs, it is considered that this Option has the potential to lead to negative effects of greatest significance.

There is a range of nationally and locally designated biodiversity located around Monmouth. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outlined above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the River Wye SSSI through atmospheric pollution, recreation, water quality and water quantity, level and flow. Option I has the potential to impact on the Wye Valley Woodlands SSSI/ National Nature Reserve through atmospheric pollution.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, there are hedgerows/trees/ dense scrub extending along the field boundaries of Option G, and there is a corridor of mature trees running along the boundary of Option I. Therefore, development at Option I, and to a lesser extent Option G, has

the potential to lead to negative effects on biodiversity through direct loss of habitats and associated species present, in addition to potential for indirect negative effects as a result of increased disturbance, noise, light and air pollution. Consideration should be given under all Options for the potential to deliver positive effects through retaining and enhancing biodiversity where possible; delivering net-gain. This may include creating/ expanding upon ecological corridors and enabling habitat connectivity; notably through Option I.

Overall, all Options have the potential to lead to long term significant negative effects on biodiversity as a result of nutrient neutrality implications for the River Wye SAC. Additionally, all Options have the potential to adversely impact upon the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve to the east of the settlement. In terms of ranking the options, given the proximity of Option I to both SACs, and the biodiversity present at the Option itself, it is considered that this Option has the potential to lead to negative effects of greatest significance. It is considered that Options G and H perform similarly in relation to the biodiversity ISA theme. All Options have the potential to deliver positive effects through biodiversity enhancement/ net gain.

## Historic environment

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

There are no designated heritage assets within or in close proximity to Option G. This growth area is approximately 500m from the significant number of heritage assets present within the settlement and separated by the existing built up area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.

There are no designated heritage assets within or adjacent to Option H. There are a number of listed buildings to the north east and east in close proximity to the River Monnow. To the south east of the growth area lies the Monmouth (Central) Conservation Area which includes a significant number of listed buildings. There are also a number of scheduled monuments, including Monmouth Castle. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth (Central) Conservation Area. However, this is uncertain at this stage.

There are no designated heritage assets within Option I; however, there is the Monmouth (Dixton) Conservation Area to the south east which contains two scheduled monuments and five listed buildings. There are also three listed buildings to the north west on the other side of the A466. The boundary of the Monmouth (Central) Conservation Area extends up the A466 near the south of the growth area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the designated heritage assets in the wider area, including the Monmouth Central and Dixton Conservation Areas, listed buildings and scheduled monuments. However, this is uncertain at this stage.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

Overall, Option G is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. It is not possible to identify any significant differences between Options H and I at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

## Landscape

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at Monmouth, the area immediately south east of the settlement is the Wye Valley National Landscape (formerly Area of Outstanding Natural Beauty (AONB)). Planning Policy Wales (2018) gives National Parks and National Landscapes (AONBs) equal status in terms of landscape and scenic beauty, recognising that these designated assets should be “*valued for their*



*intrinsic contribution to a sense of place, and that their special characteristics should be protected and enhanced.*<sup>68</sup> In addition to national policy requirements, protection is also provided to the Wye Valley through the Wye Valley AONB Management Plan (2021), which sets out themes and aims for the AONB (now National Landscape). Given the location of the Options to the west and north of Monmouth, it is not considered that any of the Options will impact on the National Landscape (AONB) or its setting.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. Option I is adjacent to a Landscapes of Outstanding or Special Historic Interest, to the south west of the Option.

It is also noted that Option H is considered to have a high amenity value and is designated in the current adopted LDP as an 'Area of amenity importance' under Policy DES2 (Areas of Amenity Importance). In accordance with Policy DES2 *"development proposals on areas of amenity importance will only be permitted if there is no unacceptable adverse effect on the visual and environmental amenity of the area, including important strategic gaps, vistas, frontages and open spaces [...or...] linked areas of green infrastructure in terms of its contribution to the character of the locality"*. The delivery of Option H therefore has the potential to impact upon the important qualities of this area, with the potential for long term negative effects.

A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>69</sup> Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Monmouth. However, looking specifically at the Options in turn:

- **Option G** is categorised as high to medium landscape sensitivity to residential development.
- **Option H** is categorised as high/medium sensitivity to residential development.
- **Option I** is categorised as having a high/medium sensitivity to residential development.

Overall, Option G is less sensitive in terms of the landscape, and development in this area is therefore less likely to result in a residual negative effect compared to the other Options. Given uncertainties no significant differences between Options H and I in terms of the nature and significance of effects could be identified at this stage, and will likely be dependent on the precise scale, layout and design of growth. Furthermore, both options are identified as having high/medium sensitivity to development through the Landscape Sensitivity Update Study (2020), and are both constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance'). Options H and I are therefore ranked

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<sup>68</sup> Welsh Government (2018) Planning Policy Wales

<sup>69</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

equally, with the potential for negative effects. For all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

## Climate change (including flood risk)

Options	Option G – Land west of Monmouth	Option H – Land in central Monmouth	Option I – Land north east of Monmouth
<b>Rank</b>	=	=	=
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure, and as such all Options perform equally in this respect.

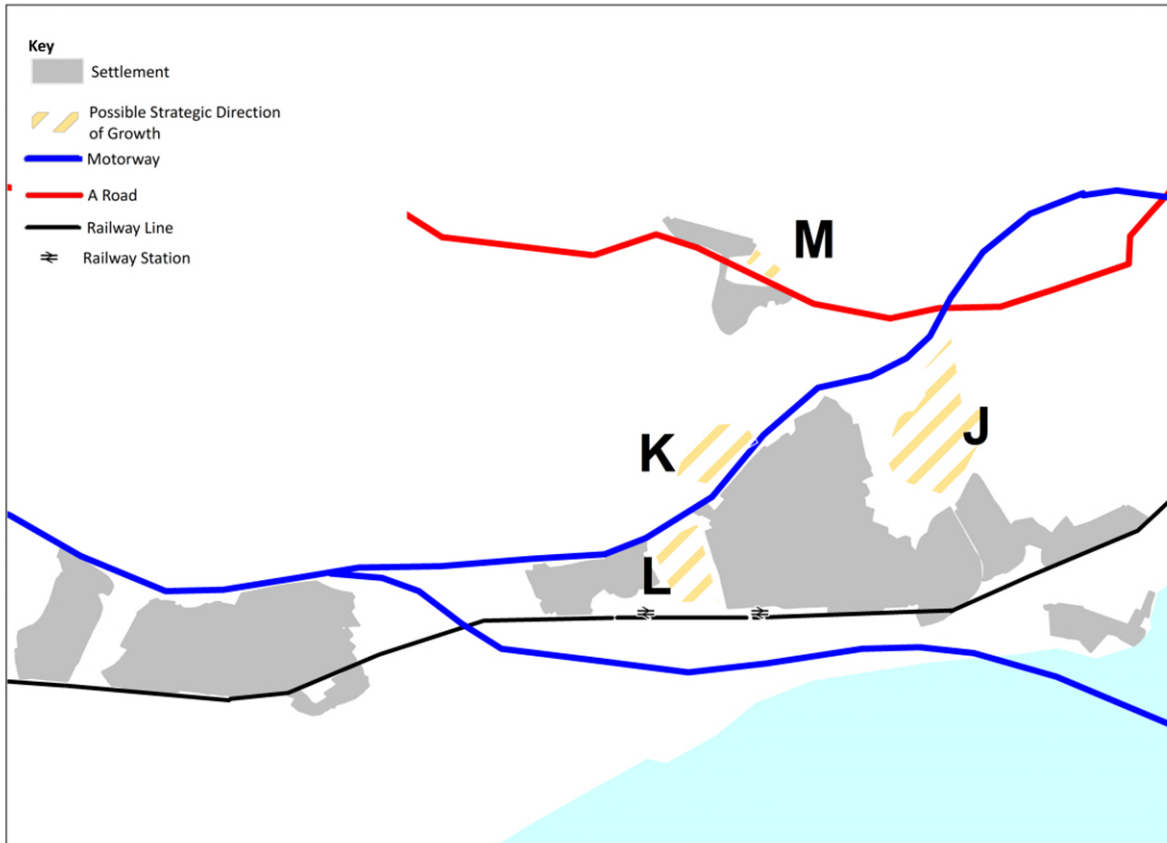
It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform reasonably well in this respect through directing growth towards a Tier 1 settlement; however, given the absence of a railway station, the existing high levels of congestion in the town and the presence of the often congested A40 and A466, there may be a continued reliance on the private vehicle for travel.

In terms of managing flood risk to address climate change, it is recognised that the floodplain of the River Wye is a constraint throughout the centre of the town and in parts of Over Monnow. However, all Options are located away from areas at high risk of flooding, within Flood Zone A.

Overall, development proposed at the individual Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options perform on a par in terms of potential flood risk and seek to support the uptake of sustainable travel where possible. However, given the presence of the A40, A466, and absence of a railway station, there is likely to be a continued reliance on the car as the primary mode of travel. Effects on climate change are therefore uncertain.

## Severnside options

- Option J: Land north-east of Caldicot.
- Option K: Land north-west of Caldicot.
- Option L: Land west of Caldicot/ east of Rogiet; and
- Option M: Land east of Caerwent.



## Economy and employment

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Caldicot is classified as a Primary Settlement within the RLDP settlement hierarchy and has functional transport links with the smaller settlements of Rogiet, Caerwent, Portskewett, Sudbrook and Crick, which together are considered to share characteristics to make up the identifiable group of Severnside. The Severnside area has an important role as the ‘Gateway to Wales’, with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, and as a whole is well located for the nearby employment markets of Newport, Cardiff and Bristol. There are key rail links to these employment markets with stations at Rogiet and Caldicot connecting with the key settlements of Cardiff in the West and Bristol /Cheltenham/Midlands in the east. There are also good road links to the M4 and M48 motorways, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the west, and Chepstow to the east. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.

In terms of facilities and services present, Caldicot and Magor and Undy are identified as higher tier settlements and therefore provide the greatest range of services and facilities of all the Severnside settlements. Option L therefore performs most positively of the options, given it is 1 mile/ 19-minute walking distance from Caldicot town centre. Following this, Option K is approximately 1.4 miles, a walking distance of 26 minutes; and Option J is approximately 1.9km and approximately 22-minutes walking distance. Option M is 2.1 miles from Caldicot town centre, although it is appreciated there are some limited facilities, such as a Post Office, in the nearest settlement of Caerwent.

Employment sites are present throughout the Severnside area. Notably, Severnside Industrial Estate is located to the south east of Caldicot, which is a significant employment base and separates Caldicot from neighbouring Portskewett. Options J and L are best performing in terms of access to this employment site, given these Options would extend the built settlement of Caldicot, south of the M48. Option K followed by Option M is less well located in this respect; however, they are still considered to be able to access the site. There is also land allocated for employment to the North West of Magor/ Undy with the established Magor Brewery site and Wales One Business Park. These sites are relatively distant from all Options; however, they still have the potential to be capitalised upon via the M48/M4 corridor.

All Options have the potential to include employment land and infrastructure delivery to support the town, encouraging inward investment and supporting local economic growth. It is considered that all Options would be able to deliver a similar level of infrastructure, and therefore Options cannot be differentiated between in this respect. Nonetheless, it is considered that the delivery of infrastructure alongside development has the potential to lead to positive effects against this ISA theme, although this is uncertain at this stage.

Overall, all Options are anticipated to lead to long-term positive effects against this ISA theme. Option L is best performing as it is most centrally located in terms of access to services and facilities in Caldicot town centre, has good access to road links to the M4 and M48 motorways to access outside employment markets, and is within reasonable distance of employment opportunities to the south of the town. Option M performs least well of the Options given its poor access to Severnside centres, poor access to employment sites within Severnside, and limited potential to capitalise upon the strategic road network.

## Population and communities

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>

All Options perform equally in terms of providing sufficient housing to meet the identified housing needs of the community, as it is assumed that all Options could deliver the same quantum of growth. Long term significant positive effects are predicted in this respect.

All Options will lead to positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic economic links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the south of the County. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway station immediately to the south. Option M is the least well connected given its location along an A-road, furthest away from the M4 corridor and rail line.

In terms of integrating with existing communities/ settlements, Option L performs most positively as it would infill between Rogiet to the west and Caldicot to the east. Option J would also perform positively in this respect through extending Caldicot to the north east. However, while Options J and L have the potential to deliver positive effects in terms of promoting the growth of existing communities; Option L may also lead to the coalescence of Rogiet and Caldicot, with the potential for negative effects in terms of settlement/ community identity.

Option K performs less well given the Option is detached from Caldicot by the M48, and therefore would likely be isolated to some extent from the existing settlement to the south. Residents would likely be reliant on the car to access services and facilities in Caldicot and would perform less positively than Options J and L in terms of supporting sustainable communities. This is also likely to be the case through growth at Option M, however, this option is arguably least well performing as it is in a less sustainable location, north of the M4 corridor. Option M would however likely positively integrate with Caerwent; delivering positive effects to this settlement through infrastructure delivery and subsequent improved accessibility.

Overall, it is therefore considered that Option L, followed by Option J perform most positively in terms of enhancing the Severnside area, integrating with key settlements, and the opportunity to utilise opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option K, while adjacent to the M48/ M4 strategic transport network and in close proximity to Caldicot, performs less well as it is severed from the community by the motorway. Option M performs least well given its relative detachment from the M4 corridor and the main town of Caldicot; and subsequent reduced potential to deliver sustainable communities.

## Health and wellbeing

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

There are two GP surgeries located within the Severnside area within close proximity to the Options; Gray Hill Surgery and Portskewett Surgery. Options J, K and L are all within 1km / 20-minute walk of a GP practice, while Option M is 2.4 miles (drive) from Portskewett Surgery.

In terms of wider health facilities, the Grange University Hospital, is located in Cwmbran, is approximately 24.7km from Options K and L, 24km from Option M, and 26.4km from Option J. Option M is worst performing in terms of access to a GP, while all Options perform on a par in terms of access to a hospital and wider health services.

Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements which have functional transport links. The Severnside area, has an important role as the 'Gateway to Wales', with the area immediately adjacent to the Second Severn Bridge (Prince of Wales Bridge) crossing, providing access to Newport, Cardiff and Bristol. Railway stations at Rogiet and Caldicot connect with the key settlements of Cardiff in the west and Bristol/ Cheltenham/ Midlands in the east. Option L is best located in terms of access to

Caldicot railway station and the Severn Tunnel Junction at Rogiet; being 0.5 miles/ 10-minute walking distance from the Caldicot station. Option K is 800m from Caldicot station, however this would involve crossing the M48. Option J is 1.1 mile / 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245m detached by the Country Park.

While not sustainable transport options, it is worth noting that there are good road links from the Options to the M4 and M48 motorways; including the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with settlements in Newport to the West, and Chepstow to the East. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 and railway stations immediately to the south.

Options located in close proximity to the motorway also have the potential to perform negatively against this ISA theme as a result of potential impacts on residents' health (i.e., through atmospheric and noise pollution). The Department of Transport's Transport Analysis Guidance outlines that, within 200m, the contribution of vehicle emissions from the roadside to local pollution levels is significant.<sup>70</sup> Options L and K perform most negatively in this respect given their location adjacent to the motorway. However, it is noted that the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

Overall, Option L performs particularly well in terms of proximity to health services and supporting healthy forms of transport to reach health (and wider) services/ facilities /employment. Options J and K perform relatively on a par against this ISA theme, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from health facilities and sustainable travel opportunities in the key Severnside settlements (namely Caldicot).

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<sup>70</sup> <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>



## Equalities, diversity, and social inclusion

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>4</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Within the Severnside area, Caldicot and Magor and Undy have been classified as higher tier settlements and as such, expanding upon built form through all Options will lead to positive effects in terms of supporting and sustaining a hierarchy of vibrant centres across the County, focussing development in accordance with recent population growth data. Positive effects are predicted for residents' quality of life, creating more positively integrated communities.

None of the growth options fall within areas of significantly high deprivation. As highlighted above, development at all Options will support equal communities with improved accessibility to services, employment, and affordable housing; however, it is considered that by targeting the most deprived communities through Option L, positive effects are likely to be enhanced to some degree.

Option J itself is the least deprived of the Options and will likely deliver increased positive effects through reducing inequalities between sub-urban and urban areas; expanding upon Portskewett village located to the east of Caldicot.

Options that are well located in terms of sustainable settlements also perform positively through ensuring access to services for more vulnerable or immobile groups in the community, particularly elderly residents and young families, and especially those without access to private vehicles. Option L is best performing in this respect given its location nestled between two existing communities that are well supported in terms of infrastructure provision and sustainable travel opportunities. Options J and K also perform positively in this respect; however, it is noted that Option J is slightly detached from the main centre, and Option K is detached from existing communities by the M48. Option M performs least positively given it is not well connected with sustainable centres, services and facilities.

Overall, it is considered that all Options perform positively against this ISA theme through supporting the growth of and regeneration of existing communities, improving access to housing, jobs and services. However, positive effects are likely to be less significant through Option M, given its comparative detachment from the Severnside area. Option L is predicted to lead to positive effects of greatest significance through targeting deprived areas to the east of the Option. This will promote equality, developing more inclusive communities in a sustainable location.

## Transport and movement

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

In terms of the strategic transport network, the Severnside area has an important role as the gateway to Wales on the M4, with the M4 Junction at Magor and Undy. The A48 also runs across the north of the Severnside region connecting settlements along the A48 with Newport to the West, and Chepstow to the East. Levels of self-containment throughout the Severnside area are very low, holding the characteristics of a 'dormitory' area with high amounts of out-commuting and reliance on the car as the primary mode of travel. There are however, more recently, significant employment bases present at Magor, Undy, Rogiet and Portskewett; increasing traffic levels throughout the settlements and across the M4 corridor. It is considered that Option L is the most well connected in this respect, with access to the M48 immediately to the north, and M4 to the west of Magor Undy. Option M is the least well connected given its distance, comparatively, from the M4 corridor.

Given the location of all Options to the south of the County, it is considered that development under all Options is likely to result in increased vehicular use throughout the Severnside area, with the potential for long term negative effects. However, it is noted that all Options will deliver long term positive effects through capitalising upon the recent removal of the Severn Bridge Tolls and the ambitions and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Utilising these strategic transport links will contribute positively towards delivering sustainable communities, achieving infrastructure improvements/ provision in the South of the County.

Access to sustainable transport throughout the Severnside area is good. Caldicot and Rogiet (at Severn Tunnel Junction station) have rail links to Newport and Cardiff to the west and Bristol/ Cheltenham/Midlands in the east. Option L is best located in terms of access to Caldicot station, being 0.5 miles/ 10-minute walking distance away. While Option K is within 800m of the station, this would involve crossing the M48, and is therefore not seen to be particularly accessible. Option J is 1.1 mile/ 22-minute walk from the station; and Option M is furthest away, 2.5 miles to the north. In terms of bus services in the area, Options L and M are well located; Option L is located adjacent to bus services on Rogiet Road and Longfellow Road, and Option M is within 400m of a bus stop just off the A48. Options K and J are however less well located; Option K is detached from bus services extending through Caldicot by the M48, and Option J is distant from bus services on the B245 detached by the Country Park. Option L therefore performs most positively overall given its location in close proximity to the

railway station, and subsequently the increased opportunity to encourage modal shift for shorter journeys both within Caldicot and Rogiet, and for wider commuter journeys.

All Options are assumed to have the potential to include enhancements/ improvements to services/ facilities and public transport. As set out above, the level of infrastructure delivery is expected to be equal under all Options, and therefore none of the options are better performing in this respect.

Overall, all Options perform well against this ISA theme, directing growth towards the south of the County and more specifically around the M4 corridor, capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot and Rogiet) and the wider M4 corridor.

### Natural resources (air, land, minerals, and water)

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>

While air pollution is not a major problem in Monmouthshire it can cause significant problems for people's health. The greatest problems associated with air quality in the County are caused by vehicle emissions, and therefore Options perform positively where they seek to utilise sustainable transport opportunities; such as active travel networks, improved public transport and electric charging point infrastructure. This will help to reduce the impact of transport-based emissions and improvements in air quality. Option L is best performing in this respect, given its sustainable location nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure (such as the Severn Tunnel Junction station) and encourage modal shift. Option M performs least positively given it is detached from sustainable transport along the M4 corridor and within/ surrounding Caldicot, with high reliance on the car for travel anticipated.

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. Detailed agricultural land quality

surveys will be undertaken by site promoters as part of the candidate site process, and therefore at this stage ALC at each of the Options has been based on the Predictive ALC model for Wales (2019).<sup>71</sup> The area of all Options is predominately Grade 1 agricultural land. The exception to this is approximately 1/3 of Option K which is Grade 3b land; and Option L includes areas of Grade 2, Grade 3b and Grade 4 land to the north east of the Option. Options L and K are therefore best performing in this respect as they would necessitate the least amount of loss of BMV land.

All Options comprise entirely greenfield sites and consequently it is not possible to differentiate between them in terms of promoting the use of previously developed land. In this context it is possible to say that Options L and K perform better than Options J and M in relation to protecting the County's soil/ and resource.

Monmouthshire's mineral resource is focused to the south of the County, with part of Option M and Option K falling within a limestone minerals safeguarding area. Options J and L are therefore best performing in terms of protecting the County's mineral resource; however, in accordance with national and regional policy requirements, it is considered that a sustainable approach will be adopted to development within mineral safeguarding areas.

All Options are considered to perform equally in terms of demand for water, and impact on water quality.

Overall, all Options perform negatively against this ISA theme given development at each option would result in the loss of BMV agricultural land, and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing given it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage; and is not located within a minerals safeguarding area. It is difficult to differentiate between all other Options at this stage.

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<sup>71</sup> The Predictive ALC model for Wales (2017) is based on the principles of the Agricultural Land Classification System of England & Wales, the Revised Guidelines & Criteria for Grading the Quality of Agricultural Land (MAFF 1988).

## Biodiversity and geodiversity

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>1</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

In terms of European sites, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA)/ Ramsar site are located 900m south of Option L, 1.2km south of Option J, and over 2km from Options K and M. The Severn Estuary is the largest coastal plain estuary in the UK with the second highest tidal range in the world. The site covers the southern extent of the County, and contains habitats listed under Annex I of the Habitats Directive. These include estuaries, mudflats and sandflats. In addition to Annex I habitats present, primary reasons for designation are species listed under Annex II of the Habitats Directive including Sea lamprey, River lamprey and Twaite shad.

- Primary reasons for the SPA designation is that the site qualifies as an area of Internationally Important Assemblage of Birds, under Article 4.2, where over the winter the area regularly supports 84,317 waterfowl.
- Primary reasons for Ramsar designation is that there are eight criteria that are within the Ramsar designation. This includes the immense tidal range creating diversity of the physical environment and biological communities, and due to unusual estuarine communities, reduced diversity and high productivity.
- This site is also designated due to the importance for the run of migratory fish between sea and river via the estuary. It is also of particular importance for migratory birds during spring and autumn.

HRA Screening (2019) of the Preferred Strategy policies found that there is the potential for development to significantly affect the Severn Estuary SAC through atmospheric pollution, recreation, water quality and water quantity, level and flow; and for development to affect the SPA/ Ramsar site through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow. As such, the Severn Estuary, and potential impact pathways, will be considered in more detail through the Appropriate Assessment stage. It is therefore considered that all Options have the potential to indirectly impact upon the SAC/ SPA/ Ramsar site. Potential strategic growth areas have been identified as needing to be screened in for further detailed consideration through the HRA process. However, given the distance of the Options to the SPA/ SAC/ Ramsar site; it is considered that only Options L and J have the potential to lead to significant effects.

There is a range of nationally and locally designated biodiversity located around the Severnside area. Some of these designations fall within or have the same boundaries as the European sites considered through the HRA and outline above, although they may have different designated features and sensitivities in some cases. Despite this, the impact pathways identified earlier for European sites are also applicable/ relevant to nationally and locally designated sites and wider biodiversity interests. Notably, as discussed above, Options have the potential to impact on the Severn Estuary SSSI through atmospheric pollution, recreation, loss of functionally linked land, water quality and water quantity, level and flow.

Options J and K are constrained by Ancient Woodland at Farthing Hill (adjacent to Option J) and Woodland Valley (to the north east of Option K). There is the potential for development at Options J and K to adversely impact upon biodiversity present at Farthing Hill and Woodland Valley through increased disturbance, noise, light and air pollution. There is also the potential to deliver positive effects through biodiversity net-gain, this may include creating ecological corridors and aiding connectivity between sites.

Options are not constrained by locally designated sites; however, it is recognised that all sites are greenfield, and may have the potential to hold biodiversity value. Notably, Option K includes scattered pockets of hedges/ dense scrub and linear tree/ hedgerow habitats. It is noted that Dewston Garden and Grottoes Park is located adjacent to the site to the west, which is rich in biodiversity and may hold connectivity with biodiversity present within the Option. In terms of Option M, mature trees/ hedgerows densely line the site boundary to the south along the A48, and there is a patch of woodland to the east of the site further along the A48 extending north. Option L also has hedgerows lining the field parcels within the Option, and there are sparse mature trees present throughout Option J. There is the potential for development across the Options to lead to negative effects on biodiversity through direct loss of habitats and any associated species. Development should seek to retain and enhance these habitats where possible, ensuring no net loss, and seek to deliver significant positive effects through biodiversity net gain. Notably Options have the potential to strengthen connectivity across the Options and with the wider biodiversity network.

Overall, all Options have the potential to lead to adverse effects in terms of the biodiversity ISA theme. Options L and J have the potential to lead to significant adverse effects on biodiversity, given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. In terms of wider biodiversity effects, it is considered that Option K performs less well than other Options given the close proximity of Woodland Valley (Ancient Woodland), the presence of Dewston Garden and Grottoes Park adjacent to the Option, and the variety of biodiversity present within the Option itself. Option J is also constrained in terms of Ancient Woodland located adjacent to the Option at Farthing Hill, however, holds limited biodiversity within the Option. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value. It is however also noted that there is the potential for Options to deliver positive effects through biodiversity enhancement/ net gain.

## Historic environment

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>2</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

There are no designated heritage assets within Option M; however, it is in close proximity to the Caerwent Conservation Area, Caerwent Roman City Scheduled Monument and a number of listed buildings. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area. However, this is uncertain at this stage. The Option is separated from the heritage assets by the A48 and is also adjacent to existing residential development, which should help to reduce impacts as a result of development in this area.

Development at Option K would extend the settlement of Caldicot to the North West, which would cross the boundary of the M48 motorway and encroach upon designated heritage settings in Caerwent, including the Caerwent Conservation Area. The Dewstow House Historic Park and Garden, which contains four listed buildings is located adjacent to the growth area in the south-west and development here has the potential to directly affect its setting, particularly through loss of greenfield land which is likely to contribute to the character of this area. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed, and the layout takes account of any important views into and from the Caerwent Conservation Area and Dewstow House Park. However, this is uncertain at this stage.

Development at Option J would likely lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument covering the unoccupied parts. Development within this growth area would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. On this basis, the potential for a permanent significant negative effect on the historic environment as a result of strategic development in this area is identified; however, there is some uncertainty at this stage.

There are no designated heritage assets within Option L, which is also largely contained by the M48 in the north, railway line in the south and existing urban areas in the east and west. It's possible that the site could accommodate development without any significant residual negative effects on the historic environment as long it is sensitively designed.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.

It is recognised that Monmouthshire's cultural assets also include the use of the Welsh language. The RLDP is not considered likely to have a significant effect on the Welsh language, and therefore no significant differences have been identified between the Options in this respect.

In summary, Option L is less sensitive in terms of the historic environment and development in this area is therefore less likely to result in a residual negative effect compared to the other options. Whilst uncertainties exist, Option J is considered to have greater potential for significant residual negative effects. It is not possible to identify any significant differences between Options K and M at this stage and the nature and significance of effects are uncertain and dependent on the precise scale, layout and design of growth.

## Landscape

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>1</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Uncertain</b>	<b>Uncertain</b>

As a largely rural county Monmouthshire has major landscape resources and is home to internationally and nationally designated landscapes. Looking specifically at the Severnside area, while the area is not constrained by international or national landscape designations, it is noted that the west of Caldicot is separated by an important Green Wedge from Rogiet. This Green Wedge covers Option L, and it is therefore considered that development at this location could lead to coalescence between these two settlements; affecting the degree of physical and visual separation, as well as the visual impact upon the surrounding landscape.

Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) has compiled a non-statutory Register of 58 Landscapes of Outstanding or Special Historic Interest in Wales. None of the Options fall within, or adjacent to these Landscapes of Outstanding or Special Historic Interest.



A Landscape Capacity Update study has been carried out for the County (2020), which identifies Local landscape Character Areas (LLCAs) and provides an overall analysis of each LLCA's sensitivity to residential development.<sup>72</sup>

Overall, the study has found that there is capacity for housing in Monmouthshire focussing on the larger settlements; which includes Caldicot and Magor & Undy, as higher tier settlements within the Severnside area. However, looking specifically at the Options in turn:

- **Option J** is categorised as having a high-medium sensitivity to residential development.
- **Option K** is categorised as having a high-medium sensitivity to residential development.
- **Option L** is categorised as having a medium sensitivity to residential development.
- **Option M** is categorised as having a medium-low sensitivity to residential development.

Development of Option M would likely extend the settlement of Caerwent to the east, north of the A48. Development would significantly increase the size of Caerwent, altering the character of the settlement and village identity, and may set precedent for further growth to the east, along the A48.

Given uncertainties no significant differences between the Options in terms of the nature and significance of effects could be identified at this stage. They could all potentially affect the character and setting of the settlement and wider landscape, depending on the design and layout of development. Despite this, it is possible to rank them; assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity and Capacity Study (2009) findings. Option J and Option K are identified as worst performing of the Options, given both have medium-high sensitivity to housing development. Option K would likely lead to negative effects through extending development northwest of the M48 into the open landscape, which currently acts as a physical barrier to development. Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L performs more strongly than Options J and K as it is considered to have medium sensitivity to residential development. However, development of Option L could lead to coalescence between Caldicot and Rogiet, which may result in the loss of a multi-functional open space and designated 'Green Wedge'. Option M may also set precedent for further development in the open landscape to the east along the A48, however is of medium-low sensitivity to development, and therefore is best performing of the options.

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<sup>72</sup> White Consultants (2009) Monmouthshire Landscape Sensitivity and Capacity Study

It is noted that for all Options, mitigation (which reduces the extent of development to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects. However, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.

## Climate change (including flood risk)

Options	Option J – Land north east of Caldicot	Option K – Land north west of Caldicot	Option L – Land west of Caldicot	Option M – Land east of Caerwent
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

Monmouthshire's rurality, limited public transport, high levels of car ownership and the subsequent reliance on the private car, combined with high energy consumption can all contribute to carbon emissions. Monmouthshire County Council declared a climate emergency in May 2019, and as such growth Options will be required to contribute positively towards meeting the Council's aim of reducing its net carbon emissions to zero by 2030.

In relation to climate change adaptation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO<sub>2</sub> emissions associated with development. There are no significant differences between the Options in terms of opportunities to design-in low carbon infrastructure, i.e., given there is no difference in quantum of housing growth between Options.

All Options also present an opportunity to support adaptation to the potential effects of climate change through providing improvements to the local green infrastructure network. As above, it is considered that all options are able to deliver a similar level of infrastructure. However, it is noted that Option L is an area of open green space, defined as a 'green-wedge'. The loss of this area of green infrastructure has the potential to lead to negative effects in terms of climate change adaptation.

It is considered that there is the potential to reduce greenhouse gas emissions by reducing the need to travel and encouraging the use of sustainable transport modes. Notably, the Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. All Options perform well in this respect, directing growth towards the South of the County; capitalising upon strategic transport links and opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet with good access to the town centre, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Options J and K perform

relatively on a par in this respect, with Option M performing least positively. This is given that in comparison to other Options, Option M is detached from sustainable travel opportunities in the key Severnside settlements (namely Caldicot) and the wider M4 corridor. It is however noted that the utilisation of the M4 itself will result in continued high car use in the County.

In terms of managing flood risk to address climate change, it is recognised that the Severn Estuary is located along the south of the County. While the majority of Options are not constrained in this respect, the southern extent of Option L is located within Flood Zones B and C. It is however noted that development of Option L could avoid the highest flood risk areas and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere.

Overall, development proposed at the individual Growth Option scale is not likely to have a significant positive or negative effect on climate change when considered in isolation. It is anticipated that this will be addressed through the RLDP policy framework. All Options seek to support the uptake of sustainable travel where possible, capitalising upon strategic transport links to the south of the County; however, it is noted that the utilisation of the M4 corridor will result in continued high car use. As such, effects on climate change in this respect are uncertain. While Option L is best performing in terms of access to sustainable travel, Option L performs poorly due to high risk of flooding, with the potential for long term negative effects. However, it is considered that areas at high risk of flooding would be avoided where possible in line with higher tier planning policy and guidance via the PPW and Technical Advice Note 15. Option M also performs less well than other Options given its detachment from sustainable transport opportunities surrounding Caldicot and Rogiet, and subsequent likely reliance on the private vehicle for travel.

