



# Monmouthshire County Council Replacement Local Development Plan (2018-2033) Preferred Strategy Representation Form

The Monmouthshire County Council Replacement Local Development Plan (RLDP) Preferred Strategy is available for public consultation for 8 weeks from **05 July 2021 to 31 August 2021**. All comments made should be restricted to the content of the Preferred Strategy and should address the questions included in this form which are designed to assist with your representation. Please use this form to respond to the consultation using additional sheets as necessary. Further copies of the form can be obtained from the Planning Policy Team, the Planning Policy website, your local Community Hub / library via the request and collect service,<sup>1</sup> or you can photocopy this form.

## PART 1: Contact details

Your/ your Client's details		Agent's details* (if relevant)
Title:	Mr	
Name:	Dick Cole	
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\*Note if agent's details are included, all correspondence will be sent to the agent and not to the persons/organisations given in Part 1.

You should include all your comments on this form. If you wish to submit them electronically please use the following link: <http://monmouthshire.planning-register.co.uk/>

### Office Use Only

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<sup>1</sup> <https://www.monmouthshire.gov.uk/community-hubs-and-libraries/>

## PART 2: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help us to understand the issues you raise.

### Key Issues, Vision and Objectives: (Paras 3.1-4.3 / Pgs 30-43)

*Do you have any comments on the key Issues, Vision and Objectives?*

The Issues are fairly summarised, except that the need to respond to climate change by planning policies is given insufficient weight when there is a need to address the emergency that is under way. As they are unquantified, we agree that the stated Objectives are sufficiently aspirational yet also achievable within a spatial planning context. Thus we note that Objective 1 merely seeks economic growth; Objective 9 relates only to the retention of young people, not to population growth by in-migration; Objective 10 refers only to local housing needs. The Vision is similarly acceptable, as is the unquantified spatial implication that by 2033 'Monmouthshire [sic] will have grown sustainably'.

Our quarrel is with the scale of the preferred measures to deal with the issues and objectives. The Council's economic development ambition is unsurprising, but the scale of this indicated in the RLDP is not supported by convincing evidence, especially the assumption that it will be achieved by housebuilding; the development plan should enable job creation rather than assume it will occur.

### Preferred Strategy – Sustainable and Resilient Communities Strategy (Paras 4.4-4.9 / Pgs 44-47)

*Do you have any comments on the Sustainable and Resilient Communities Strategy?*

**We object, for the reasons below and for those set out in response to Strategic Policy S1.**

The strategy relies on the dated belief that the more growth you achieve the more you achieve your objectives. While growth in some sectors (the 'green economy') may assist combating the climate emergency, the consumption of fossil fuels and many other resources to achieve growth is no longer considered sustainable. Even if the belief in accelerated growth is accepted, success would rely on all the elements being in place at the same time. In this case that means the extra housing (market and affordable), the extra jobs, and the extra infrastructure. Without that coincidence the county's settlements will be less sustainable and resilient than they are now. A strategy that relies primarily on maintaining a rate of housebuilding that is more than twice the rate of the past fifteen years in the belief that a corresponding number of jobs will materialise in the right places is especially risky at a time when the economic, environmental and social future is extremely uncertain.

As has been the case with the Adopted LDP, land allocated for housing is eventually taken up, substantially by or because of the net in-migration into the county of unsustainable long-distance commuters. The local growth of employment appears to have been slight. We have seen no evidence to refute this. Other uncertainties will include the demographics of the newcomers, whether the necessary affordable housing will be achieved, the viability of housing sites unless normal S106 requirements are forgone, and whether roads, sewerage, schools and health services can cope without reduced quality.

As there is substantial provision for further housing within the present LDP, we repeat our

recommendation that the council takes a precautionary approach to its replacement, perhaps with a shorter time horizon and based on recent housebuilding rates but with strenuous efforts to create jobs around the county. Progress on the Strategic Development Plan, the results of the 2021 Census and post-Covid trends should provide better evidence on which to base a sound plan. We also believe that UK and Welsh Governments will have to introduce new planning policies that will contribute more to the delivery of the net-zero carbon by 2050 target, or something more ambitious.

### **Strategic Policies S1 – Strategic Sustainable and Resilient Growth (Paras 4.10-4.27 / Pgs 47-54)**

*Do you have any comments on Strategic Policy S1 – Strategic Sustainable and Resilient Growth?*

**Policy S1 in effect restates the council's preference for Growth Option 5 in the consultation earlier this year. We objected to that preference and continue to do so, for reasons summarised below.** It disappoints us that the council has opted for a strategy supported mainly by landowners and developers rather than the lesser growth favoured mostly by those representing county residents' views.

The 7,605 extra homes arise mainly from the conclusion that this level of growth will best achieve the council's demographic, affordable housing and travel reduction objectives. We have argued broadly against this conclusion in our answer to the previous question.

Additionally:

- The Welsh Government's Population and Household Projections should be the starting point for plan-making, but the planning authority may alter some of the underlying assumptions if supported by evidence. The latest projections for Monmouthshire in 2033 anticipate an increase of between 1,942 and 3,381 households. The dwelling requirements would be somewhat higher, but far short of 7,605 and no more than an average of around 230pa. We recognise that there may be reasons to provide more than that projected in order to secure affordable housing and reduce out-migration, but encouragement of accelerated in-migration is discretionary and the case for the preferred scale of this is rejected for reasons described throughout this response.
- We question the need to add a 10% flexibility allowance. This inevitably becomes the 15-year target regardless of need; there is little likelihood that sites will be deleted because they are not required.
- Up to 8,366 extra homes could mean an average completion rate of 558pa or about 500pa excluding the flexibility element. Paras 5.30/31 state that the average completion rate for the past ten years has been 300 and it has been about 400 in the last three years<sup>2</sup>. Over 500pa has not been reached since 2001/02, casting considerable doubt on the capacity or wish of the construction industry to sustain such levels.
- An average delivery rate of about 300pa may be acceptable if it is the result of a marked acceleration of the delivery of affordable housing, but we await evidence that extra resources will be available or that 50% provision rates are deliverable.
- We do not agree with the council's opinion that this level of growth is in general

<sup>2</sup> StatsWales figures are rather different, with an average of about 230pa over the past ten years.

conformity with Future Wales 2040. On a pro rata basis FW2040 says that SE Wales will need about 50,000 extra homes by 2033. It is not clear whether that figure relates to a period starting in 2018 or whether it includes a flexibility allowance, but MCC's Preferred Strategy would mean that 16-18% of the regional need would be in a county that has about 6% of the region's population.

- That share would seriously threaten the success of FW2040's Policy 1 which defines Cardiff, Newport and the Valleys as National Growth Areas. The government strategy recognises that the rural areas of Wales have a variety of local needs and aspirations, but clearly states that efforts to meet these should 'complement rather than compete with efforts to grow cities and towns in National and Regional Growth Areas'.
- Monmouthshire is clearly a rural area as far as FW2040 is concerned, but we reject the council's somewhat disingenuous opinion that the planned extent of growth conforms with Policies 4 and 5. We consider that the planned growth goes well beyond reasonable provision to 'secure sustainable economic and housing growth which is focused on retaining and attracting working age population'. Monmouthshire is certainly losing young people, largely because of a need for more employment opportunities and affordable housing; the death rate exceeds the birth rate and net in-migration accounts for modest past and projected growth. But encouraging markedly more in-migration without assurance of sufficient new jobs is high-risk and not consistent with the spirit or intentions of FW2040.
- The council's concern about the age structure of the county's population, which is similar to that of Powys, Herefordshire and the Forest of Dean, is a consequence of administrative boundaries. If the administrative unit was Gwent the demographics would be more normal, as would be the ability of the council to support services. Reliance on planning policy to improve the age structure is misuse of the system; there should be other mechanisms to correct this imbalance of funding.
- While the council accepts that a c16% increase in the county's built-up area will be at the expense of environmental quality and some of the best and most versatile agricultural land, as we have said, it does not need to adopt a strategy that has this result.

The figure of 7,215 new jobs is derived from modelling job growth arising from the demographic and housing-led projection. The trend projection of 783 new jobs is consistent with the modest employment growth of the past fifteen years, as evidenced by government figures, a period when an average of about 280 extra homes (MCC figures) have been added annually. The conclusion that doubling the housebuilding rate will result in a ninefold increase in the number of jobs stretches credibility. It can only reflect a belief that the economic development aspirations of the council, Cardiff Capital Region and the Welsh Government will result in such growth. On past experience this seems unlikely and risky, with unsustainable consequences in terms of commuting.

We note that the 7,215 jobs are expected to be spread widely between sectors including construction, retailing, tourism, professional etc services and health and social work, rather than manufacturing, and agree that is likely, though not on such a scale. We also suggest that many of these jobs will be low paid and unlikely to appeal to the in-migrants. The suggestion that working-from-home will contribute sustainably to this growth is of course relevant but unpredictable (see comments on Policy S13).

**Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy (Paras 4.28-4.46 / Pgs55-65)**

*Do you have any comments on Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy?*

Any strategy for the spatial distribution of development must, at this stage, be somewhat speculative in the absence of more information on the capacity of settlements to accept growth consistent with the ‘sustainable and resilient’ objective. The phasing of dealing with the phosphate pollution issue, for example, could impact greatly on the distribution of development.

**We argue for much less growth than indicated in Policy S1 and favour its distribution in much the same way as the present LDP or Policy S2 – with only modest new allocations of land for housing expected, but hopefully local job opportunities throughout the county.**

If Policy S1 growth and the council’s interpretation of conforming with Future Wales 2040 prevail, Policy S2 (previously Spatial Option 2) or something more like the previous Spatial Option 1 (the policy of the present LDP) is acceptable *as long as there is a reasonable balance of homes and job opportunities at the local level*. In the event that the amount of growth is accepted but the spatial distribution has to fit more closely with the growth areas indicated in Future Wales 2040, we suggest a shift of a substantial proportion of that growth towards the south of the county and close to the Newport and Torfaen boundaries – in effect a variation of Spatial Option 3. Homes and jobs are more likely to be balanced in that way, and public transport services are more likely to improve.

**Strategic Growth Areas (Please State which Strategic Growth Area you are commenting on) (Paras 5.45-5.55 / Pgs 88-95)**

*Do you have any comments on the potential Strategic Growth Areas? If you would like to suggest site specific allocations, please submit these as part of the Second Call for Candidate Sites process which is running alongside this consultation.*

**Our response to this question is provided on the basis that our comments in no way prejudice our opinion that the Preferred Strategy relies on excessive housing growth and that the allocation of strategic growth areas is unnecessary, especially at Abegavenny/Llanfoist.**

**Abergavenny and Llanfoist**

We continue to see no need for substantial new allocations of housing land in the Abergavenny area – certainly not on the scale implied in Strategic Growth Areas. Completions 2018-2021, commitments and rollover, small sites and windfalls could provide about a thousand homes, an increase of around 10% on the present stock, but we acknowledge that some may not materialise and that the need for affordable homes may justify one or more small new sites where 50% or more affordable provision will contribute to that need. Some candidate sites outside the Strategic Growth Areas might then be acceptable to us.

Without prejudice to that position and subject to access to the extensive further information

required about candidate development sites, we offer the following comments:

#### **Option A**

- We have proposed option A as a candidate site for development-free protection as a Green Wedge buffer between the development area and the National Park boundary. This buffer has been protected for decades and is justified in the interests of the setting of the Park on landscape grounds, and our proposal is maintained here.
- It is regrettable, even prejudicial, that our Green Wedge proposal is not mentioned in Appendix 4 and in the Review of Candidate Sites against the Preferred Strategy, where sites in this area should have been coloured 'yellow' not 'green' (as in the Gavenny valley).
- We also consider it misleading to deal with option A as a single site when this has not been the position adopted elsewhere, leading to incorrect assumptions about the sustainability of any development. For example, whilst the eastern extremity of the site is adjacent to primary and secondary schools, the western part of the site is at a greater distance (1.5 miles) from schools where places are available.
- We note that much of this option is also proposed by developers as candidate housing sites. Apart from the above, the reasons why these are unacceptable vary from section to section. They include highway access, landscape impact, agricultural land quality (high?), elevation (up to 150m) and gradients (up to 12%) (15 minutes to the town centre by active travel, but not always in reverse), biodiversity value and impact on the conservation area.
- Should we accept the need for a small allocation of more land in the Mardy area, there may be some scope if the remainder of option A is designated as a Green Wedge.

#### **Option C**

- This area is likely to be high quality agricultural land. Landscape sensitivity is less than A or B, but 8ha of development here would add considerably to the never-ending expansion of Llanfoist which the council has previously indicated would be resisted. Integration with Abergavenny by active travel and by road needs more than just the projected new active travel bridge over the Usk.

#### **Option B**

- Proposed for mixed development, this 65ha site is larger than the needs of Abergavenny by 2033 under any strategy. Development here breaches the long-standing A465/railway barrier to the town's growth and climbs the slopes of the Little Skirrid increasingly steeply to about 140m (it might be confined below 125m, the present limit on the slopes of the Deri). The value of the agricultural land may be high. Given accessibility, proximity to the rail station is a significant advantage.
- At some time in the future the needs of Abergavenny may justify housing east of A465 and an employment site, or sites, could be sympathetically considered now. Whether a substantial housing allocation is needed in this replacement plan depends greatly on the final growth strategy.
- The placemaking challenge of development east of A465 is integration with the rest of the town. An active travel link over A465 and the railway might be associated with the provision of a station car park, though this would be awkward to access by road from the town as access to the entire site by car might only be via the Hardwick A40/A465 junction. We have previously suggested that development in the vicinity of the Ross Road junction would be more easily accessible to the A465 and, less satisfactorily, the town. Unfortunately, that option, also more acceptable in landscape terms, has not been put forward as a candidate site for housing.
- Regardless of the actual site allocated, development east of A465 will have high up-

front infrastructure costs and should be developed in line with growth in local job opportunities – probably slowly. A variety of housing providers and tenures should be required. If viable, development here will at some time present a welcome opportunity for masterplanning a new community.

The question may arise whether option B, in whole or part, can be the single new allocation at Abergavenny, thereby increasing its viability. Other candidate sites may claim to be acceptable and more viable, and some may be so. At this point we remind you that we proposed parts of the Gavenny Valley for Green Wedge protection from development.

We are very conscious that the council's resolution of all these matters will not be public until the Deposit Plan is recommended for submission. We believe that there would be mutual value in a degree of joint working on Abergavenny/Llanfoist matters during the period leading to November 2022. This could involve town and community councils and local groups such as ourselves. While Chepstow has embarked on a Place Plan that will presumably involve such liaison, we and others at Abergavenny have felt that a comprehensive Place Plan is premature until the future of the town is clearer. But joint working should start before then.

**Strategic Policies S3 – S18 (Please State which Strategic Policy you are commenting on)  
(Paras 5.4-5.146 / Pgs 67-132)**

*Do you have any comments on the Strategic policies?*

Some of the Strategic Policies and the accompanying text might usefully be condensed bearing in mind that the Management Policies will provide more detail.

**S3** – An overarching Placemaking and Design policy is welcomed, though we would prefer 'development must' to 'should'. The 'should' in the present LDP policy may have prevented the poorest quality but often resulted in design of only mediocre quality. We are unclear how development would 'include and promote' high quality design - 'be of...' would be clearer and better. 'Connectivity' between uses (and with adjacent development?) may need explanation – perhaps better combined with (ii) where 'co-location' is not a clear term to use. We do not necessarily agree that the approach to design should be *led* by Green Infrastructure, important though this will often be; good design responds to all aspects of the context, opportunities and needs of the site.

**S4** – While a strategic policy response to climate change is welcome, the requirement to 'make a positive contribution' needs further thought. Only developments such as renewable energy, One Planet holdings and flood prevention works are likely to be net-positive; housebuilding and most other development are not (retro-fitting of homes being outside the planning process). What you are presumably seeking is that all developments reduce their impact via the listed (or other) means, but the difficulty is in defining what level of reduction will be required. For example, will it be enough for a developer to simply provide PV panels on a roof? Development management policies will of course need to be more specific, but the wording of this strategic policy needs more thought.

Criterion viii) the reference to flooding here needs to be stronger. The term 'avoid' should be replaced by 'not locating highly vulnerable development', to ensure the policy is in conformity with national planning policy guidance and advice.

**S5** – While this policy conforms to normal practice, the cost of satisfying these planning obligations can result in a reduction in design quality. The list of possible obligations includes some design matters but we would like to see a statement that the planning authority does

not expect meeting the requirements of S5 to be at the expense of meeting the requirements of S3 or S4.

**S6** – The policy itself seems to add nothing to S1, to which we have already objected, though the subsequent text does contain some extra information. Could this policy add something about the intention to provide a range of sites for all sectors and types of house builder, as expected by para 4.2.12 et seq of PPW11? We note that Government guidance seems thin on how this might be managed and await the RLDP management policies, but hope that the Council will contribute via its own Development Company.

We continue to doubt whether the average of over 500pa can be achieved over the fifteen-year period, especially as a fifth of that time has elapsed and the slow start of the present LDP may well be repeated.

**S7** – Assuming these figures ignore the 10% flexibility allowance, the target of 2,450 affordable homes consists of 961 via ‘committed’, windfall and small sites (about 23% of 4,237 (4,708 less 10% flexibility)) and 1,489 via new allocations (45% of 3,292 (3,658 less 10%)). The strategy is now sensibly less specific about how this will be achieved, though the indication in para 5.41 that only about 775 will be delivered on 50/50 sites does not appear to square with the 45% average for all new sites above. These figures should be clearer in the Deposit Plan. The policy and its explanation are also not now specific about the types of tenure to be achieved; we hope that the emphasis will be on rented social housing for which the LHMA shows there is the greatest need.

Our strong reservations about relying on building unnecessary market housing to achieve the target have been made earlier, and we also emphasise our concern that, in the light of sometimes disappointing performance via the present plan, the Council will find it difficult to deliver the county’s needs via this policy. We look forward to seeing more details in the Deposit Plan and are encouraged by the recent Welsh Government commitment to provide 20,000 new low-carbon rented social homes by 2026, which pro rata could mean up to 700 in Monmouthshire.

**S8** – Our reservations have already been expressed about the need for strategic sites at Abergavenny. We await the outcome of this consultation and para 5.45 et seq. The phosphate pollution issue could markedly affect the strategy, especially in the period while the Strategic Development Plan is being prepared, which might lead to a review of this Replacement Plan.

**S10** – As you know, Integrated Network Maps are now Active Travel Network Maps. This bullet point should read ‘...through providing, safeguarding, enhancing and expanding the Active...’ (While most provision may rely on the Local Transport Plan programme, provision can also be via development management). ‘Minimising the adverse effects of parking’ could mean the refusal of home extensions likely to lead to more on-street parking, a decision that rarely seems to happen.

**S11** – We are pleased to read that the more detailed shopping policies of the present LDP are to be reviewed with the aim of sustaining multi-function town centre viability and vibrancy by more flexibility. It will be important that policies do not obstruct the adaptation of centres to changing circumstances; non-commercial uses, including residential, can play an important part in sustaining vital activity. There is a need to review the opportunities for development in town centres, perhaps via Place Plans, with guidance to achieve high quality placemaking. There are a number of sites which could be considered for redevelopment within town centres during the plan period, perhaps with the relocation of some businesses to sites on the edge of the town, releasing central brownfield sites for housing. The Society would be keen to work with the planning authority and the Town Council on such work.

**S12** – You are aware of the shortage of allotment/community gardening facilities at Abergavenny and we hope to see a land allocation in the Deposit Plan.

**S13** – While we have no objection to the wording of this policy as the county needs to be



ready for sustainable economic development, for reasons set out in our response to Policy S1, we do object to the assumption that the Preferred Strategy will promote higher employment growth and reduce the net outflow of workers on the scale assumed. Paragraphs 5.84-87 are now a large part of the council's defence of its employment policy. We agree that working from home/remote working has increased since March 2020 and that it reduces the need to commute, but the future extent of this, and the mitigation it seems to offer to relax the need to bring homes and job opportunities closer, are yet more uncertainties that make the strategy high-risk and unsound. If incoming home workers choose to live outside large towns, they may even increase their car mileage accessing local services, and the consequences for public transport and city centres should be part of the analysis. The Welsh Government ambition is not a forecast or even a target that it can greatly influence

Unfortunately non-B Class uses have taken up most of the prime employment site previously allocated at Abergavenny/Llanfoist. While some jobs have been created there, the town can no longer offer such opportunities for the better-quality employment needed. It is a particular fear that employment sites, especially in mixed use developments, will be released for other uses, including unnecessary housing, if not taken up within a few years - they should be safeguarded and Policy S13 needs to be clear on this.

**S14** – If sufficient employment to meet plan objectives cannot be created in towns, the potential role of modest rural enterprises, accessibly near towns and collectively providing a substantial number and variety of jobs, must be harnessed. We hope that the Deposit Plan will strike a careful balance between a positive approach to rural enterprise and safeguarding rural qualities. The re-use or adaptation of existing buildings and the siting of new buildings in existing groups should be emphasised.

**S18** – We suggest that the policy itself should indicate that a net benefit for biodiversity will normally be required.

While we welcome Policy S18 and commend MCC for its recognition of the importance of Green Infrastructure, it is disappointing not to see a comparable strategic policy for maintaining, protecting and enhancing the built fabric of the county, especially the heritage features. The overarching Policy S3 refers to both GI and the built environment, but only the former is supported by a further strategic policy. There is a need for a strategic policy such as:

*In order to achieve better places to live, work or visit development proposals must respect and where possible improve the quality and distinctiveness of the built environment and heritage of the county including:*

- i) Having regard for the character of the buildings and spaces of urban and rural settlements, especially in conservation areas and their settings;*
- ii) Protecting and/or enhancing the architectural and/or historic qualities and value of ancient monuments, listed buildings or other structures of merit;*
- iii) Making provision for necessary archaeological or historical investigation;*
- iv) Considering the effect of development on cultural assets.*

(We note that Policy HE1 of the adopted LDP refers to the 'landscape setting' of conservation areas which suggests a more restricted interpretation of 'setting' than in, say, para 6.1.15 of PPW11).

**Review of Existing Adopted LDP Development Management Policies Options (Please State which Development Management Policy you are commenting on)**

*Do you agree with the recommendations with regard to the existing Adopted LDP Development Management Policies?*

Generally we do, though we await sight of the many amendments intended. Policies RET1, LC6, DES1, and SD2 particularly interest the Society. Policy SD2 is especially weak at a time of Climate Emergency, merely permitting low carbon measures if sought and requiring development to incorporate 'efficient resource use' – a requirement that we suspect is little enforced, if only for lack of expertise and SPG.

The omission of Policy E3 (Working from Home) may be unwise at a time when this may be increasing and dealing with complaints may require clarity of rights and policy. The policy should be worded to cover all business use, including that for a business based elsewhere.

We presume that a management policy will be needed for the indicative Green Belt.

**Any other Comments**

*Do you have any other comments on the Preferred Strategy?*

We are concerned that the Second Call for Candidate Sites expects these to be in conformity with the Preferred Strategy. This prejudices the outcome of the present consultation and rules out the possibility of more suitable non-conforming sites being submitted at this stage. We believe that even the 'Review of Candidate Sites against the Preferred Strategy' suggests that the strategy is not to be changed, and a review 'against Key Constraints' would have been more appropriate.

The Preferred Strategy is also deficient in that it makes no strategic proposals for the Future Wales 2040 Green Belt or Green Wedges. We recognise that only the indicative Green Belt area can be shown in the RLDP, but expected the promised Green Wedge Review to inform the Preferred Strategy rather than be an afterthought.

The Review of Sites states that there is no need for One Planet sites to be considered for allocation in the RLDP. However, these are permanent structures, with a change in land use so it would be quite appropriate for such development to be included as allocations and within the total number of residential units. A policy of allocating an area for One Planet dwellings on the perimeter of selected rural settlements, perhaps on public land, with rent and purchase price levels constrained, would be a positive measure. Such sites need not

necessarily come forward as windfalls assessed against national policy; a more proactive attitude would be welcome.

### Welsh Language

*We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?*

No observations.

*Please also explain how you believe the proposals could be improved so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?*

No observations.

### Initial Integrated Sustainability Appraisal

*Do you have any comments on the Initial Integrated Sustainability Appraisal Report?*

The Appraisal, prepared by consultants commissioned by the council, unsurprisingly generally endorses the Preferred Strategy. Most of the report restates the history and conclusions of the council's plan-making process and it is difficult to find any criticism of policies. Unfortunately it does not address the basic question of whether accelerated growth is sustainable in the context of the Climate Emergency and Government zero-carbon targets, or even achievable. It also fails to consider the magnification of risk associated with this growth if the interdependent elements do not coincide. Tables 6.1 and 10.1 simply support the council's conclusion that high population and employment growth is best for the county.

There are interesting hints in, for example para 9.27, that a strategy that put more emphasis on development in Severnside, close to Newport, would be more in line with Future Wales 2040.

References to the 'cumulative positive effects likely in relation to the economy and employment from growth at Abergavenny and growth along the Heads of the Valleys corridor' do not fit well with recent history. Despite its strategic location Abergavenny has probably suffered a net loss of jobs in recent years, partly because of incentives to provide

jobs further west, most of them effectively only accessible from the town by car.

We question the conclusion that the strategy is positive in terms of the Transport and Movement theme when additional development will add to urban traffic volumes and active travel networks do not exist. There is unlikely to be significant improvement of the capacity and frequency of public transport services beyond the south of the county until late in the plan period.

Closer study would probably give rise to other comments, but our main concern remains the failure of the Appraisal to question whether the consumption of resources to achieve substantial growth is the most sustainable option and whether the risks of failing to achieve all the council's main objectives have been assessed in terms of the requirements of the Appraisal.

### Habitat Regulations Assessment

*Do you have any comments on the Habitats Regulations Assessment?*

No – we have little expertise in this area and leave comment to those that have.

Please note that due to the Covid-19 pandemic the Planning Policy Team are all working from home. Therefore, to assist with the efficient processing of responses we would encourage you to submit your comments via email to: [planningpolicy@monmouthshire.gov.uk](mailto:planningpolicy@monmouthshire.gov.uk). If this is not possible, completed forms can be sent to Planning Policy Team, Monmouthshire County Council, County Hall, The Rhadyr, Usk, NP15 1GA. All responses must be received by **midnight on 31 August 2021**.

Please note that comments submitted will be available for public inspection and cannot be treated as confidential.

On 25<sup>th</sup> May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. The Planning Policy Privacy Notice is available via the following link on the Council's website: <http://www.monmouthshire.gov.uk/your-privacy/your-council>

The GDPR applies to our RLDP Consultation Database which is used to send information to those who have been in contact with Planning Policy at Monmouthshire County Council.

Please check the box to confirm that you are happy for your details to be retained on the RLDP Consultation Database. **YES**

It would be helpful if you are able to receive future RLDP correspondence by email. Please check the box if you are happy to receive future correspondence by email and provide your email address in Part 1. **YES**