

Monmouthshire Local
Development Plan (LDP)

Sustainability Appraisal Report of the
Monmouthshire County Council Deposit
LDP (June 2011)

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1 Introduction

- 1.1 This document provides the joint Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Deposit Monmouthshire Local Development Plan (LDP). The report summarises the appraisal process to date.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.2 The Planning and Compulsory Purchase Act (2004) sets out the requirement for each Local Planning Authority (LPA) to produce a Local Development Plan (LDP). In accordance with the Planning Act (2004), all LDPs are also required to be subject to a Sustainability Appraisal (SA). The role of the Sustainability Appraisal is to assess the extent to which the emerging planning policies will help to achieve the wider environmental, economic and social objectives of the LDP. In the Local Development Plan Manual (2006) produced by the Welsh Assembly Government, it is suggested that the SA should be an *'integral element of each stage of LDP production'* (para 2.3.1).
- 1.3 The LPA must also produce a Strategic Environmental Assessment (SEA) in accordance with the European Strategic Environment Assessment Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. These require the *'environmental assessment'* of certain plans and programmes prepared by local authorities, including LDPs. The SEA Directive focuses specifically on the effects of the LDP on the environment.
- 1.4 The Welsh Assembly Government (2006) has produced guidance on undertaking the SA of LDPs and recommends Local Authorities to integrate the SEA into the SA. Such an integrated approach will help to avoid unnecessary confusion and duplication. The SA therefore incorporates the requirements of the SEA. Throughout this document and in the accompanying Appendices where reference is made to the term 'SA' it should therefore be taken to incorporate the requirements of the SEA Directive. In line with the Directive the SA will give consideration to the likely environmental effects of the plan, including those of strategic alternatives. The SA also has a role to help identify ways of reducing potential adverse impacts through suitable mitigation measures.
- 1.5 The SA provides an enabling role in the promotion of sustainable development as an integrated part of the LDP preparation process. This includes an imperative role to consider the sustainability impacts of the LDP, including any proposed alternative approaches, at an early stage and throughout the LDP preparation. The SA can also provide the basis for monitoring the sustainability of the LDP during implementation as part of the wider LDP monitoring process.
- 1.6 The outputs of the combined SA and SEA are sustainability reports that detail the appraisal process followed, and include results of impact assessment, together with recommendations on how the sustainability performance of the LDP could be improved.
- 1.7 This report is the Sustainability Appraisal Report of the Deposit LDP.
- 1.8 Baker Associates have been appointed as planning consultants to provide professional assistance in the undertaking of the SA. The consultants are providing

advice and guidance to the Council on SA throughout the LDP preparation process and are also carrying out an independent appraisal of the plan to provide an objective view on its sustainability implications. Baker Associates have prepared part of Section 3, Sections 8 -15 and Appendices 1 -8 of this Report.

Process

- 1.9 The ODPM produced guidance in 2005 on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents and suggests Local Authorities adopt the following stages when conducting SA, starting with Stage A, the preparation of the scoping report, which the Council produced in March 2008:

Stage A- Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B- Developing and refining options and assessing effects.

Stage C- Preparing the Sustainability Appraisal Report.

Stage D- Consulting on the preferred options of the Development Plan Documents and Sustainability Appraisal Report.

Stage E- Monitoring the significant effects of implementing the Development Plan Document.

- 1.10 Section 3 of this report sets out the approach to the sustainability appraisal of the Monmouthshire LDP.

Habitats Regulations Assessment

- 1.11 In accordance with the requirements of the Habitats Directive, Habitats Regulations Assessment (HRA) should be undertaken during the preparation of the LDP. The purpose of HRA is to assess whether the plan proposals would have any significant adverse effects on designated sites defined under Regulation 10 of the Habitats Directive; which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The HRA should not be incorporated into the SA or SEA. It should run alongside parallel to the process. Enfusion have undertaken the HRA of the Deposit Plan, this document can be found on the Councils website or viewed at the Councils offices.

The Local Development Plan

- 1.12 The purpose of the Deposit LDP is to provide an overarching and comprehensive land use planning framework for the County, setting out the vision, objectives and strategy for Monmouthshire, along with the strategic and detailed policies and proposals to implement these. It provides for the development and use of land, for the protection of the environment, it facilitates investment decisions and also provides for the delivery of services and infrastructure.
- 1.13 The purpose of the combined SA and SEA is to test the emerging LDP for its contribution towards sustainable development, and to identify where there may be impacts on achieving greater sustainability to help inform the decisions made on the emerging LDP. It is the intention of the SA to not only look at how sustainability matters have been included in the LDP, but also to check whether the approach being taken is in keeping with 'good plan making'. The reason being that whatever the good intentions for sustainable development of the LDP, benefits can only be realised if the plan can be successfully delivered and development properly implemented to achieve its aims of greater sustainability. This process of independent verification of

plan making is a valuable role of any SA helping in the preparation of a better, more effective, LDP.

- 1.14 The SA has already progressed through a number of stages. The Scoping Report to provide the background to the SA process was prepared in April 2008 and was made available for public consultation for 5 weeks, the responses received at this stage were documented in a report of consultation which was submitted to Full Council in November 2008. Although the Council has not produced a revised Scoping Report, the Sustainability Framework was revised as a result of comments received and endorsed by Council. A SA was undertaken for the Strategic Options in February 2009 to feed into the Preferred Strategy Process. In May 2009 the Initial Sustainability Appraisal Report (ISAR) was produced. The SA of the hybrid option was subsequently undertaken in February 2010. These earlier reports provide a useful background to the SA process undertaken and can be accessed on the Councils website or viewed at the Councils offices.

2 Content of the sustainability appraisal report

- 2.1 The Sustainability Appraisal (SA) report has been prepared in line with the requirements of the Strategic Environmental Assessment (SEA) Regulations. The SA report follows on from a number of other SA documents produced throughout LDP preparation thus far; these documents include the Scoping Report and Initial Sustainability Appraisal Report which provide useful background on the process undertaken. These documents are available to view on the Councils website or at the Councils offices.
- 2.2 **Section 3** – This section provides information relating to the methodology used in the SA process and the stages of appraisal that have been completed so far.
- 2.3 **Section 4** – Identifies the objectives of other strategies and plans relevant to the LDP and SA.
- 2.4 **Section 5** – Provides details of the baseline information collated and its essential role in the consideration of environmental, social and economic issues.
- 2.5 **Section 6** – Describes the identification of the main sustainability issues through the analysis of baseline data and ‘scoping’ undertaken early in the SA process.
- 2.6 **Section 7** – Presents the sustainability framework, identifying the sustainability objectives that define sustainable development for the LDP and appraisal.
- 2.7 **Section 8** – Refers back to the earlier stages of SA on the appraisal of strategic options, this section is supported by Appendix 2 and 3 showing outputs of the earlier appraisals.
- 2.8 **Section 9** – Comprises the SA of the Vision and Objectives of the LDP, the matrices of which are located in Appendix 1.
- 2.9 **Section 10** – Provides an SA of the spatial strategy including the SA of the strategic policies, supplemented by Appendix 4.
- 2.10 **Section 11** – This contains the appraisal of the site allocations, assessing the compatibility of the selection process with objectives for sustainable development. The detailed findings of the appraisals are located in Appendix 5 and 8.
- 2.11 **Section 12** – Provides the appraisal of the plan policies, Appendix 6 relates to the SA of the Development Management policies.
- 2.12 **Section 13** – Summarises how potential impacts of the LDP on sustainable development could be mitigated against.
- 2.13 **Section 14** – Sets out the monitoring proposals for the SA.
- 2.14 **Section 15** – Provides a summary of findings of the SA.

3 Approach to the Sustainability Appraisal

Introduction

- 3.1 The purpose of the combined SA and SEA is to test the emerging LDP for its contribution towards sustainable development, and to identify where there may be impacts on achieving greater sustainability to help inform the decisions made on the emerging LDP.
- 3.2 Figure 1, from the LDP Manual for Wales (WAG 2006), shows how LDP preparation, SA and consultation fit alongside one another, this is the approach to be followed in the SA of Monmouthshire LDP. The area highlighted by the red box shows where Monmouthshire are currently in respect of the SA. Integration of SA into LDP preparation is essential as it allows the appraisal to guide plan making at each stage, and the proposed approach to SA allows appraisal to respond to the stages of LDP preparation, providing input and information whenever it is needed. The SA can then provide a useful verification and testing process of each stage of the emerging LDP.

The principles of SA

- 3.3 A key premise of the approach to SA/SEA for Monmouthshire is the need to ensure the stages of LDP preparation and appraisal are properly integrated. This serves the purpose of allowing efficient feedback between plan preparation and consideration of sustainability matters for the effective incorporation of ideas and recommendations.
- 3.4 The SA is not simply the preparation of a report that identifies the sustainability implications of the LDP, but instead a process of appraisal that feeds directly into the LDP during preparation. This means the consultation reports that are produced as part of the SA are to document the process that has been followed, to allow feedback from interested people and organisations on the SA findings and what this has meant to LDP preparation.
- 3.5 It is the intention of the SA to not only look at how sustainability matters have been included in the LDP, but also to check whether the approach being taken is in keeping with 'good plan making'. The reason being that whatever the good intentions for sustainable development of the LDP, benefits can only be realised if the plan can be successfully delivered and development properly implemented to achieve its aims of greater sustainability. This process of independent verification of plan making is a valuable role of any SA helping in the preparation of a better, more effective, LDP.

Stages of SA/SEA

- 3.6 **The scoping stage:** As stated in Section 1, the scoping stage has been undertaken by the Council and provided a valuable opportunity to gain an understanding of the plan area, both for plan makers and the SA team, in order that the process of SA could be well informed by a full appreciation and understanding of local

circumstances. Central to this scoping process is giving opportunities for those with specialist knowledge of sustainability issues and the area to have an input in the SA.

- 3.7 **Sustainability Appraisal of LDP Options:** Following the scoping stage, the Options for the LDP were appraised and a report was produced by the consultants Baker Associates in the form of a Sustainability Appraisal of the Monmouthshire LDP Options Report, this is found in Appendix 2. The SA at this stage had an essential role to play in setting out the main sustainability implications for implementing the three options for housing growth and the four options for the spatial strategy set out in the LDP Options Report, helping define and refine the strategic and spatial options that will guide development in the plan area.
- 3.8 One of the main impacts the LDP can have over achieving more sustainable development is by setting and reinforcing a level and distribution of development around the County that looks to the future. The SA of the Options used objectives drawn from the sustainability framework (Appendix 6) developed for the process as the basis of assessment. The SA considered how each option performed against each of the selected objectives.
- 3.9 The SA stakeholder working group (refer to paragraph 2.19) were involved in the appraisal of options, using their expertise to help in identifying relative sustainability impacts of implementing the alternative strategy approaches.
- 3.10 It was important at this stage to keep the appraisal to a strategic level, with consideration of more detailed matters such as policies guiding development form and layout and the exact locations of new development left for the appraisal of more advanced LDP stages. It was therefore not possible to see exactly how each option would be implemented, such as the location of growth or the development control policies that will be in place. The SA therefore, had to make broad predictions of sustainability impacts, based on a set of assumptions.
- 3.11 **The Initial Sustainability Appraisal Report stage:** This was the previous stage of the SA Report, showing the outcomes of the appraisal process to the Preferred Strategy stage. The ISAR included the recording of the results of the appraisal work undertaken to get to Preferred Strategy, including predicting and evaluating the effects of the LDP options on the social, environmental and economic objectives (WAG 2006).
- 3.12 The purpose of this stage was to give an indication of what the relative sustainability implications would be of implementing the alternative spatial strategy and growth options as set out in the initial policies. Each of the policies was appraised against the sustainability objectives using a standardised matrix to ensure a systematic appraisal.
- 3.13 This version of the SA Report was put out to consultation alongside the Preferred Strategy LDP consultation; the comments that were received were taken into account when moving forward with the SA process.
- 3.14 **Current stage: SA of the Deposit version:** This stage of the SA is the appraisal of the Deposit stage LDP. At this stage the additional detail added through completed strategic policies, new development management policies and site allocations are

subject to sustainability appraisal. Many of the spatial policies of the Pre-Deposit consultation stage remain the same as they appear in the current Deposit stage. Therefore, the comments previously made remain valid and are repeated in the SA.

- 3.15 An initial SA of the deposit LDP was completed to allow sufficient time for any matters raised to be considered by the LDP team/officers of the Council and change made if necessary. The Council have prepared a summary of the influence the SA has had on the content of the final Deposit LDP, this can be found on the Council's website as a background document to the LDP.

Consultation

- 3.16 Gaining the views of those with knowledge and with specific areas of expertise within the County has aided the SA, both in defining the issues to be addressed through appraisal, and in helping identify sustainability impacts of the LDP.

- 3.17 So far there have been three stages of formal consultation on the SA process. These consultation stages are:

- Consulting on Scoping Report to agree the content and method for the SA
- Consultation on the ISAR of the Preferred Strategy
- This stage of consultation on the SA Report of the Deposit LDP.

- 3.18 In addition to the statutory consultation on SA Reporting stages a stakeholder working group was established to gain the views of others early on in the SA of the LDP. The workshop events allowed input into the method of SA and helped inform both the SA and the LDP.

- 3.19 There were two meetings of this group, these were:

- A workshop to discuss the key sustainability issues in Monmouthshire to help set the sustainability framework for the SA. This workshop was held in Abergavenny on 6 March 2008.
- A workshop to discuss the strategic options, both growth and distribution of development to feed into the ISAR. This workshop took place in Abergavenny on 14 January 2009.

- 3.20 The working group is based on the Environment Partnership Board for Monmouthshire. In attendance for either or both of the workshops were:

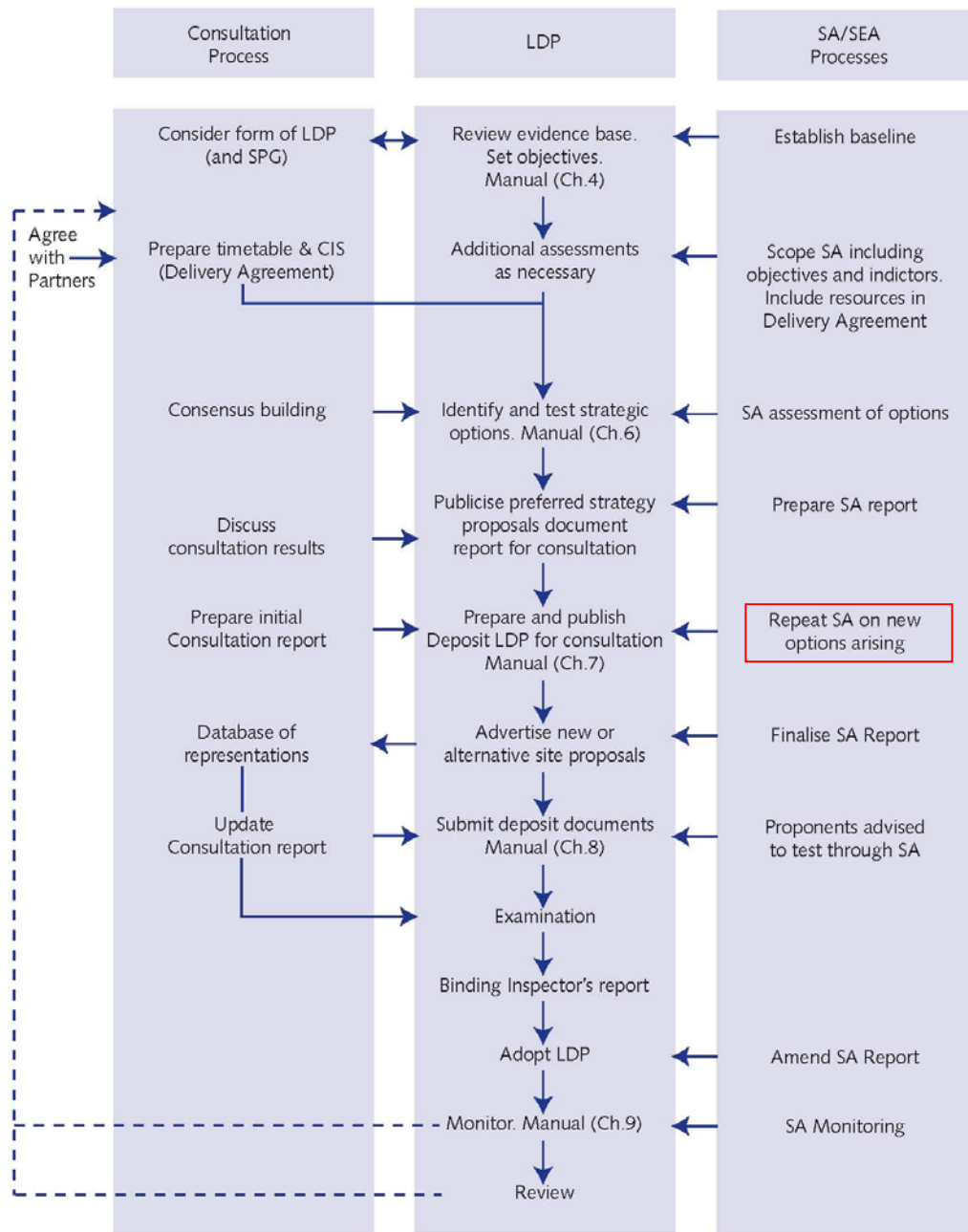
- Monmouthshire GreenWeb
- Abergavenny Cycling Group
- South East Wales Energy Agency
- Countryside Council for Wales
- Community Council Clerk/ Local Service Board
- Abergavenny Friends of the Earth
- Monmouth Friends of the Earth
- Glamorgan-Gwent Archaeological Trust

- Gwent Wildlife Trust
- CPRW
- Wye Valley AONB Partnership
- Environment Partnership
- Environment Agency
- Rural Community Action, Monmouthshire

3.21 The following departments within Monmouthshire County Council were also represented:

- Biodiversity
- Countryside
- Economic Development
- Highways
- Housing
- Sustainable Development.

Figure 1: LDP preparation stages, showing SA/SEA processes (LDP Manual, WAG 2006)



N.B. Plan preparation, SA and consultation should be undertaken in an integrated manner.

SA methodology for policy appraisal

- 3.22 This SA report considers each section of the LDP in turn aiming to identify what may be the likely sustainability effects of implementing the strategy and policies of the plan. This is supplemented by the SA matrices in Appendix 4, 5 and 6. These matrices are an essential component of the appraisal, and should be read in conjunction with the relevant text.
- 3.23 The appraisal matrices for the **strategic policies** include a symbol summary of the likely impact of the policy on each of the sustainability objectives developed for the SA. However, due to the very strategic nature of the decisions being made and the high level of uncertainty this entails, this results in many impacts being identified as 'uncertain' and marked with a question mark. Therefore this appraisal is supplemented by text to indicate the process and thinking involved in deciding on the impact. These comments may be more useful in understanding impacts than the symbol summary alone.
- 3.24 Each matrix also contains a summary of the main impacts identified and if these may be significant. Where impacts are identified the matrix contains recommendations on how impacts could be avoided or mitigated against. The majority of strategic policies have already been assessed in some form as part of the SA of the Preferred Strategy. A final section of the matrix shows how the policy has changed and what this means for sustainable development.
- 3.25 The appraisal of the **development management policies** uses a slightly different matrix. The matrix does not include a commentary on each symbol score, as the relationship of the policy to objective is normally more straightforward. Again the matrix includes a commentary of the overall sustainability, as well as recording if there are likely to be any significant impacts and recommendations on mitigation. These policies are new to the Deposit LDP, therefore there is no audit trail section.
- 3.26 Some policies are also combined in a single matrix where it is identified that the matters covered are largely the same and sustainability impacts will be similar. The combination of policies in the SA matrix also indicate that these policies could be combined for a more succinct plan.
- 3.27 The LDP also contains site allocation policies. These are appraised as they appear, with the SA making comments on the chosen locations. The choice of sites amongst alternatives is not part of this SA. The choice of sites was carried out by the Council using a set of criteria that included sustainability considerations. The SA consultants reviewed the methodology to ensure method would address sustainability issues.
- 3.28 It is also evident for the appraisal that several sustainability objectives are closely related, so effects against one will result in effects against the other. For example objectives of accessibility, air quality and energy use are all closely related particularly in terms of policies relating to the need to travel and therefore are often appraised similarly.

Meeting the requirements of the Strategy Environmental Assessment Regulations

3.29 In order to satisfy the Strategic Environmental Assessment Regulations it is necessary for the SA report to fulfil certain requirements. Table 1 shows how these requirements are being met through this SA report, both as part of the main text and thorough appendices. For further detail on some matters, such as the appraisal of alternatives, the SA reports of previous versions of the LDP will also provide a useful resource.

Table 1: Requirements of the SEA Regulations and how they are met through the SA report

SEA Requirements	Covered in the SA report at:
a) An outline of the contents, main objectives of the plan or programme and relationships with other relevant plans and programmes.	Section 1 and 4
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping report Section 6
c) The environmental characteristics of areas likely to be significantly affected.	Scoping report Section 6
d) 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.	Scoping report Section 6
e) The environmental protection objectives, established at international, community or national 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.	Section 5 and 6
f) 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. These effects should include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative	Section 10, 11 and 12 Appendix 4, 5 and 6
g) 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.	Section 12 Appendix 4, 5 and 6
h) 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.	Section 8 Appendix 2 and 3 (previous SA reports)
i) A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 14 Appendix 7
j) A non-technical summary of the information provided under the above headings.	Non-technical summary
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).	Monmouthshire SA/HRA Changes Log- Separate Report

4 Other plans, policies, programmes and strategies informing the Sustainability Appraisal

- 4.1 The review of relevant plans, policies, programmes and strategies previously undertaken at the Preferred Strategy stage informed the preparation of the SA framework. The review was undertaken to show the relationship between other plans, policies, programmes and strategies relevant to the LDP and also to help establish sustainability objectives.
- 4.2 For this to be achieved the Council identified and reviewed International, European, National, Regional and Local Plans, Policies, Programmes and Strategies. A number of additional documents were examined and added to the initial review following the public consultation exercise. This has since been updated further to reflect the changes made since the publication of the ISAR at the Preferred Strategy stage. The full details and list of plans, policies, programmes and strategies that have been reviewed can be found as a background document to the LDP on the Council's website. The list is not exhaustive and does not provide a definitive account of their contents; however, it is considered that it provides a sufficient review of those relevant to the preparation of the LDP and identifies any social, economic and environmental objectives that should be considered within the SA.
- 4.3 Each of the plans, policies, programmes and strategies were researched to develop an understanding of:
- The relevant objectives, targets and indicators
 - The implications for the LDP and SA

Key Findings

- 4.4 The review of plans, policies, programmes, strategies produced the key findings shown in table 2.

Table 2- Key findings of Plans, Programmes and Policies Review

Building Sustainable Communities	
<i>Key policy documents</i>	<i>Key messages</i>
<p>The Wales Spatial Plan 2008 Update (WAG 2008) Planning Policy Wales Edition 4 (WAG 2011) European Sustainable Development Strategy (2006) Securing the Future: UK Sustainable Development Strategy (DEFRA 2005) Manual for Streets (Department for Transport 2007) and Manual for Streets 2 (Chartered Institution of Highways and Transportation 2010) National Housing Strategy- 'Improving Lives & Communities – Homes in Wales' (WAG 2010) TAN 1- Joint Housing Land Availability Studies (WAG 2006) TAN 2- Planning and Affordable Housing (WAG 2006) South East Wales Regional Housing Apportionment-Memorandum of Understanding (SEWSPG 2007) Play in Wales: Play Policy Implementation Plan (WAG 2006) Climbing Higher- a strategy for sport and physical activity (WAG 2007) TAN 16- Sport, Recreation and Open Space (WAG 2009) Monmouthshire 2020 Our Community Strategy 2008-2012 (Monmouthshire LSB 2008): Monmouthshire Health, Social Care and Wellbeing Strategy (Monmouthshire County Council 2008) Older Peoples Strategy 2005-2008 (Monmouthshire County Council 2005)</p>	<p>Provision of good quality housing in safe neighbourhoods and sustainable communities.</p> <p>Ensure a greater choice of the type and location of housing recognising the needs of all including a sufficient amount of affordable housing in both urban and rural areas.</p> <p>Improve access to a range of community facilities, employment and open/green space.</p> <p>Increase opportunities for walking and cycling for work-related journeys and leisure.</p> <p>Contribute to the protection and improvement of people's health and well-being as part of sustainable development.</p> <p>Promote strong communities with a genuine sense of involvement and equality.</p>
Promoting a Sustainable Economy	
<i>Key policy documents</i>	<i>Key messages</i>
<p>The Wales Spatial Plan 2008 Update (WAG 2008) Planning Policy Wales Edition 4 (WAG 2011) European Spatial Development Perspective (1999) Securing the Future: UK Sustainable Development Strategy (DEFRA 2005) Wales: A Better Country (WAG 2003) Economic Renewal: A New Direction (WAG 2010) South East Wales Regional Development Strategy (SEWEF 2005) Adventa Local Development Strategy- Rural Development Programme 2007-2013 (Adventa in partnership with Monmouthshire County Council 2007) Welsh Coastal Tourism Strategy (WAG 2008) TAN 13- Tourism (WAG 1997) Draft revised TAN13- Tourism (WAG 2006) Minerals Planning Policy Wales (WAG 2000) MTAN Wales 1- Aggregates (WAG 2004)</p>	<p>Sustainable economic and employment growth should be promoted. Encourage diversification in the local economy. Development should be guided to locations that reduce the need to travel.</p> <p>Develop a diverse, competitive, high added-value economy, with high quality skills and education that minimises demands on the environment.</p> <p>Promote and increase sustainable tourism which can play a small but significant part in rural diversification.</p> <p>Mineral resources should be provided to meet society's needs. The efficient and sustainable use of minerals should be encouraged.</p>
Valuing our Environment	
<i>Key policy documents</i>	<i>Key messages</i>
<p>The Wales Spatial Plan 2008 Update (WAG 2008) Planning Policy Wales Edition 4 (WAG 2011) The Ramsar Convention (1971) The EC Habitats Directive (1992) UK Biodiversity Action Plan (1994) The Conservation (Natural Habitats, &c.) Regulations (as</p>	<p>Protect and enhance biodiversity, natural habitats and wild flora and fauna including; international, national and locally designated sites; protected species and habitat types identified as priorities for biological conservation.</p>

<p>amended 2007) Environment Strategy for Wales (WAG 2006) TAN5 – Nature Conservation and Planning (WAG 2009) Monmouthshire Local Biodiversity Action Plan (2005) TAN6- Planning for Sustainable Rural Communities (WAG 2010) Wye Valley AONB Management Plan 2009-2014 (Wye Valley AONB Joint Advisory Committee 2009) Monmouthshire LANDMAP Volumes 1-6 (2001) Monmouthshire LANDMAP Volume 7 (2003) The Air Quality Framework Directive (1996) The Kyoto Protocol (1997) One Wales: One Planet The Sustainable Development Scheme of the Welsh Assembly Government (WAG 2009) TAN 8- Renewable Energy (WAG 2005) The Water Framework Directive (2000) EU Nitrates Directive (1991) TAN 15- Development and Flood Risk (WAG 2004) Severn Estuary Shoreline Management Plan (Severn Estuary Coastal Group with DEFRA and NAW 2001) and Review (Severn Estuary Coastal Group 2010) Local Air Quality Management Progress Report (Monmouthshire County Council 2010) The EU Waste Framework Directive (1991) Wise about Waste: The National Waste Strategy for Wales (WAG 2002) TAN 21- Waste (WAG 2001) South East Wales Regional Waste Plan (WAG with local authorities 2004) Draft Municipal Waste Management Strategy for Monmouthshire (Monmouthshire County Council 2004) South East Wales Regional Waste Plan (WAG with local authorities 2004) First Review of South East Wales Regional Waste Plan (SEWRWG 2008) South Wales Regional Aggregates Technical Statement (SWRAWP 2008)</p>	<p>Promote farm diversification and sustainable rural development and reduce unnecessary development within the open countryside.</p> <p>Conserve and enhance the unique landscape and natural beauty of the AONB, the setting of the Brecon Beacons National Park and the Special Landscape Areas.</p> <p>Minimise the potential impacts new developments can have on air quality by guiding development to sustainable locations.</p> <p>Contribute to climate protection and promotion of renewable energy.</p> <p>Minimise the risk of flooding on all new developments.</p> <p>Implement a sustainable integrated approach to waste production, management and regulation which minimises the production of waste and its impact on the environment.</p> <p>Maximise waste prevention, recovery, recycling and composting and minimise incineration and disposal of waste to landfill.</p> <p>Contribute towards addressing the region's waste requirements through identification of appropriate locations for waste management facilities.</p>
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Achieving Sustainable Accessibility	
Key policy documents	Key messages
<p>The Wales Spatial Plan 2008 Update (WAG 2008) Planning Policy Wales Edition 4 (WAG 2011) TAN 18- Transport (WAG 2007) South East Wales Transport Alliance: Regional Transport Plan Final Draft (SEWTA 2008) Monmouthshire Local Transport Plan (Monmouthshire County Council 2000) TAN 4- Retailing and Town Centres (WAG 1996)</p>	<p>The demand for travel should be minimised to reduce the reliance on the private car and the consequent impact of carbon dioxide emissions. Transport facilities should be improved to create accessibility for all.</p> <p>Development should be guided to locations that reduce the need to travel.</p> <p>Efficient, competitive and innovative retail provision should be secured in accessible locations.</p>

Respecting Distinctiveness	
Key policy documents	Key messages
<p>The Wales Spatial Plan 2008 Update (WAG 2008) Planning Policy Wales Edition 4 (WAG 2011) European Spatial Development Perspective (1999) TAN 20- The Welsh Language (WAG 2000) TAN 12- Design (WAG 2009)</p>	<p>The needs and interests of the Welsh language are important to the cultural identity of the nation.</p> <p>The design process should promote the</p>

	<p>efficient use of resources, including land.</p> <p>The historic environment and cultural heritage should be preserved, enhanced and foster local diversity.</p>
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5. Baseline Information

- 5.1 Task A2 of the Scoping process related to the collection of baseline data, a requirement of the SEA regulations. The collection of this data is essential in providing an evidence base for considering environmental issues when establishing the impacts that the Local Development Plan (LDP) is likely to have on the existing situation in the County. It provided a baseline for predicting the effects of alternative LDP strategies at the strategic options stage and it also provides a benchmark against which future monitoring can take place. The SEA Regulations (Schedule 2) require that information is gathered on *'the relevant aspects of the current state of the environment and the likely evolution thereof.'*
- 5.2 The baseline data provides a collection of the key information relating to Monmouthshire's environmental characteristics, population, economic characteristics and infrastructure. In accordance with SEA regulations, this reports on the unique aspects of Monmouthshire and where available provides trends and comparator data at an all Wales level, South East Wales and at a local level for example with neighbouring authorities. The baseline can be adjusted or amended as new details become available during the production of the component parts of the SA. The baseline data was therefore updated and amended following consultation responses to the Scoping Report, prior to the production of the Initial Sustainability Appraisal Report and has subsequently been updated prior to the production of this Sustainability Appraisal Report to ensure the most comprehensive and up to date data and information is made available.
- 5.3 The revised baseline data has not been produced as an appendix to this document but can be found as a background document to the LDP on the Council's website.
- 5.4 The following environmental issues were covered in the assessment process as set out in the SEA Regulations:
- biodiversity
 - population
 - human health
 - fauna
 - flora
 - soil
 - water
 - air
 - climatic factors
 - material assets
 - cultural heritage, including architectural and archaeological heritage
 - landscape
 - the inter-relationship between the issues
- 5.5 However, as the Sustainability Appraisal (SA) is encompassed within this process the issues to be covered needed to be widened to include social and economic matters as well:
- economy
 - education and skills
 - health and wellbeing
 - services and infrastructure
 - social fabric

- sustainable development

5.6 The baseline data for Monmouthshire has been structured according to the five guiding themes of The Wales Spatial Plan:

- Building Sustainable Communities.
- Promoting a Sustainable Economy
- Valuing our Environment
- Achieving Sustainable Accessibility
- Respecting Distinctiveness.

6. Sustainability Issues

- 6.1 Sustainability issues were identified within the Initial Sustainability Appraisal Report following an exercise undertaken in the Scoping process, through analysis of the baseline data along with the key messages from the review of the relevant plans, policies programmes and strategies. They were not derived however necessarily to be the only issues that the LDP will need to address. Further issues were identified by the community itself through the public consultation process on the Scoping Report and therefore the sustainability issues have been updated and amended where necessary.
- 6.2 The identification of sustainability issues was a key component in influencing the emerging SA Framework in particular through identifying targets and indicators.
- 6.3 The sustainability issues vary to some extent to the key issues set out to be addressed in the LDP.

1. BUILDING SUSTAINABLE COMMUNITIES

Population

- Monmouthshire is a predominantly rural county with only 45% of the total population living in wards defined as being in urban areas (i.e. with a population of more than 10,000)
- The population of Monmouthshire has been showing a steady increase, all of this growth being fuelled by in-migration, although it appears that some rural areas have actually been experiencing out-migration.
- Monmouthshire has a relatively higher proportion of older age groups and a lower proportion of young adults compared with the United Kingdom average.
- Assembly projections indicate that the number of households in South East Wales will increase by 18.6% (108,900) between 2003 and 2021. Monmouthshire will have to accommodate a share of this growth, both to fulfil its regional obligations and ensure the viability of its own communities.

Housing

- House prices are high in relation to earnings and there is a pressing need for additional affordable housing in the County in both urban and rural areas.

Health and Well-Being

- Monmouthshire generally performs well on indicators relating to such issues as deprivation, health and crime, although there are small pockets of deprivation in some of its urban area.
- Poor access to community facilities and declining local service provision is an issue for rural communities.

Community Facilities and Recreation

- Some communities in Monmouthshire experience a shortfall in the provision of the community and recreational facilities.

- Most of Monmouthshire's residents have good access to the countryside, which can have positive effects on health, social progress and general well being.

2. PROMOTING A SUSTAINABLE ECONOMY

Employment and Economic Development

- There has been a slow uptake of allocated employment land in the past that has led to pressure for it to be used for other purposes such as housing and retail.
- Generally employment rates are good in Monmouthshire but there are some small pockets where unemployment rates are high.
- There are high levels of out commuting from the County.
- Distances travelled to work are relatively high.
- Jobs in Monmouthshire are characterised by low average wages.
- Traditional industries like agriculture are in decline and there is a need to sustain and regenerate the County's rural economy.

Tourism

- Tourism plays a significant part in the Monmouthshire economy particularly in assisting in the diversification of the rural economy.

Minerals

- Minerals extraction plays a limited role in the economy of Monmouthshire but the County has to make an appropriate contribution to the sustainable supply of aggregates to the South Wales economy as a whole.

3. VALUING OUR ENVIRONMENT

Biodiversity, Flora and Fauna

- Monmouthshire is a largely rural County and has major biodiversity resources, a number of which are internationally recognised. The Severn Estuary off its southern coastline, in particular, is a European Special Protection Area, Ramsar Site and candidate Special Area of Conservation. The Rivers Usk and Wye, the Wye Valley bat sites and Wye Valley woodlands are also significant internationally recognised sites, being Special Areas of Conservation as well as Sites of Special Scientific Interest.
- There are 49 nationally designated Sites of Special Scientific Interest within the LDP area.
- There are numerous European and Nationally protected species in Monmouthshire.
- Monmouthshire has a significant number of locally important habitats and species including Local Nature Reserves, Sites of Importance for Nature Conservation and Local Biodiversity Action Plan habitats and species.
- There is a need to improve connectivity within the landscape through protecting and improving existing wildlife networks and corridors and creating new linkages to allow species to move and adapt to climate change impacts.

Air

- Air pollution is not a significant problem in Monmouthshire, although there are two Air Quality Management Areas in the County at Usk and Chepstow.
- As in the rest of the country greenhouse gases are continuing to rise, conditions in business, transport and housing all contributing to the problem.

Water Resources

- Water quality and quantity are generally good in Monmouthshire, although there are nine ground water source protection zones in the LDP area that need to be safeguarded from pollution.
- Parts of the County are vulnerable to flooding, a risk that is increasing through climate change and rising sea levels. Such flooding represents a considerable risk to human health and property.

Soil and Land

- There is a relatively high percentage of grade 3 agricultural land in Monmouthshire (grades 1 to 3a being the best and most versatile land), although the data does not distinguish between 3a and 3b land.
- The proportion of land in Monmouthshire that is farmed is considerably higher than the Welsh average.
- The average percentage of housing completions on brownfield land has been around 40% over the past seven years. The limited supply of brownfield land is a significant issue in Monmouthshire.

Landscape

- Monmouthshire has a rich and diverse landscape, which incorporates part of the Wye Valley Area of Outstanding Natural Beauty and part of the Brecon Beacons National Park.
- Approximately 55% of the LDP area is designated as Special Landscape Area in the adopted UDP and recent work has suggested that a much larger area could be considered to be of such 'outstanding' or 'high' quality as to also justify Special Landscape Area status.

Waste

- Monmouthshire has made good progress in the promotion of the recycling and composting of waste. There is a pressing need, however, to reduce the reliance on landfill (particularly as the majority of the County's waste that is destined for landfill is transported some considerable distance outside the County), the amount of waste generated and the long distances travelled for the disposal of waste. Monmouthshire also has to make an appropriate contribution to the regional requirement for waste management.

Climate Change

- The use of energy derived from burning fossil fuels for transport and in buildings gives rise to emissions that are changing the balance of the atmosphere, contributing to global warming. There is an urgent need to reduce our levels of greenhouse gas emissions in order to prevent further damage to the atmosphere and significant rises in global temperatures

4. ACHIEVING SUSTAINABLE ACCESSIBILITY

Transport

- Within the overall national context of increasing levels of car ownership and traffic volumes, Monmouthshire has relatively high levels of long travel to work distances and of usage of the private car.
- Heavy reliance on the private car and limited opportunities for the use of public transport is a particular issue in rural areas.

Retail

- Achieving sustainable accessibility requires that retail and other service provision takes place in existing centres that have good access to public transport. Generally the Council's town centres are reasonably healthy, although they are vulnerable to out of town developments. There are concerns in Abergavenny in particular relating to 'leakage' of food shopping outside the County.

5. RESPECTING DISTINCTIVENESS

Language and Ethnicity

- Statistics show that the Welsh language and minority ethnic communities do not play a significant role in the make up of Monmouthshire's population.

Cultural Heritage

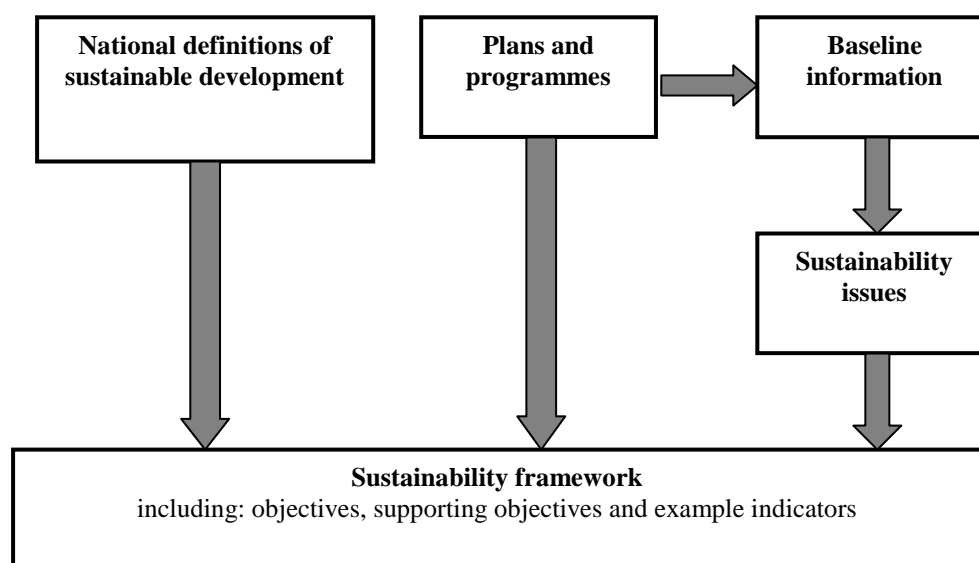
- Monmouthshire has a rich cultural heritage, including 31 Conservation Areas, 44 Parks and Gardens of Special Historic Interest, 3 Landscapes of Outstanding Interest, 13 Archaeologically Sensitive Areas, 195 Scheduled Ancient Monuments and approximately 2200 Listed Buildings (within the planning administrative area at the time of baseline data collection).
- An integral element of Monmouthshire's distinctive settlement pattern arises from its historic towns and villages and their relationship with the surrounding rural areas.
- The County has experienced substantial suburban expansion, particularly around the M4 'corridor' in the south and much recent development has a bland, standardised appearance that does little to create any distinctive sense of place.

7. The Sustainability Framework

Introduction

- 7.1 In order for a successful sustainability appraisal to be carried out it was essential at the Scoping stage to set up a standard definition of what is required for sustainable development in Monmouthshire. This was then used as a constant against which LDP performance is assessed. The definition is set out in a 'sustainability framework' for the SA of the LDP.
- 7.2 The framework shows the diverse range of issues that are encompassed by the term 'sustainable development', with an objective set for each issue that shows what type of change would represent a movement towards more sustainable development.
- 7.3 The development of the sustainability framework was an essential output of the SA scoping exercise. The process of defining the framework began with a generic understanding of what sustainable development means for delivering development through a LDP. This understanding was then used to establish a set of 'headline' matters for the framework. Using the 'sustainability issues', derived from information gathered on the baseline data and review of relevant plans, policies, programmes and strategies, the objectives and supporting objectives were then tailored to the specific characteristics of Monmouthshire; which are shown in Table 3 and in full in Appendix 6.

Figure 2: Approach undertaken to develop the sustainability framework



Defining sustainable development

- 7.4 The starting point for the sustainability objectives is the basic understanding of sustainable development based on intergenerational equity in the use of resources and assets; where what we do now does not harm the ability of people in the future to have at least the same standard of living as we do now. Inherent, also, to the concept of sustainability is of seeking to ensure that within each generation there is equity in use of resources and no one group has their quality of life compromised due to the actions of another.

7.5 The four objectives of sustainable development from the UK Government sustainable development strategy, 'A Better Quality of Life' (May 1999), set out simply the main ideas of sustainable development, these are:

- social progress which recognises the needs of everyone
- effective protection of the environment
- prudent use of natural resources
- maintenance of high and stable levels of economic growth and employment.

7.6 This approach was updated following the publication of the UK strategy for sustainable development 'Securing the Future' in 2005. This was produced in conjunction with the UK shared strategy framework 'One future – different paths' (March 2005) which gives the purpose of sustainable development as a goal that:

'...will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well-being. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible'

7.7 'Securing the Future' the new Sustainable Development Strategy sets out five guiding principles that will replace the four aims of the previous strategy, as quoted in paragraph 6.5. The strategy defines sustainable development as:

- living within environmental limits
- ensuring a strong and healthy and just society
- achieving a sustainable economy
- promoting good governance
- using sound science responsibly

7.8 Further to this a Wales wide sustainable development scheme was published in May 2009 'One Wales: One Planet - The Sustainable Development Scheme of the Welsh Assembly Government'. This scheme sets out the vision of the Welsh Assembly Government and highlights the priority attached to sustainable development for Wales:

'In Wales, sustainable development means enhancing the economic, social and environmental wellbeing of people and communities, achieving a better quality of life for our own and future generations:

- *in ways which promote social justice and equality of opportunity; and*
- *in ways which enhance the natural and cultural environment and respect its limits using only our fair share of the earth's resources and sustaining our cultural legacy.*

Sustainable development is the process by which we reach the goal of sustainability'

The sustainability framework

7.9 The sustainability framework attempts to identify those matters of environmental, economic and social capital that are basic to achieving more sustainable development. The sustainability framework in table 2 identifies these basic elements together with a main sustainability objective that clarifies what it is being sought from development that would represent a movement towards greater sustainability. The

diverse range of issues considered demonstrates the complexity and scope of issues covered in seeking more sustainable development.

- 7.10 Appendix 6 shows an additional level of detail in the sustainability framework. The main objectives are explained through an indicative set of supporting objectives. These are not intended to be an exhaustive list and simply aim to add clarity to the main objective by defining the measures an LDP could take to achieving more sustainable development. These objectives are also closely related to the specific plans and strategies that cover the local Monmouthshire Area, including the Community Strategy, and those covering countryside, health and wellbeing and the local economy, as identified in the background document of the review of Plans, Programmes, Policies and Strategies, available on the Councils website.
- 7.11 The more comprehensive framework in Appendix 6 also contains possible indicators that could be developed into a suitable set to monitor the sustainable implementation of the LDP. These indicators express a 'direction of change' that the Plan could bring about to make a positive step towards achieving more sustainable development. Many are based on the information from the baseline characterisation, whilst others identify matters on which data could be gathered in future. In some instances it is not possible to identify an indicator, reasons for this include where there is no reliable way of gathering data on an issue as it is more qualitative than quantitative, or where an indicator is of no use as the reasons for change are more likely to be attributable to the implementation of strategies other than the LDP.
- 7.12 The sustainability indicators are set out in a separate framework to the monitoring indicators in the Deposit LDP. The sustainability indicators will be used as a tool for monitoring sustainable development in the plan area and will be monitored once the plan is adopted.

Developing the sustainability framework

- 7.13 The sustainability framework was developed using the scoping process and included:
- **the baseline data collection:** which helped to identify the main sustainability issues facing the County so that these were able to be incorporated into the sustainability framework as objectives or supporting objectives. In addition the quantified information was used to help identify possible indicators for monitoring.
 - **the review of plans, programmes, policies and strategies:** this helped to find other sustainability objectives for the area that this sustainability appraisal will need to recognise and incorporate into the report
 - **stakeholder input-** two workshops were held to discuss the main issues in the Monmouthshire area that need to be addressed through the sustainability objectives.
- 7.14 Further to the above, a Report of Consultation was submitted to Full Council on 20 November 2008 relating to the results of the responses to the Sustainability Framework. The consultation responses were collated and divided into different sections according to the comments made for each headline. The Councils response was summarised with the resulting changes being set out at the end of each topic. The Council endorsed the revised sustainability framework. The Report is available on the Council's website.

Table 3: Sustainability framework

In the table the * symbol indicates a climate change related objective

Cross-cutting objective for Climate Change	
Ensure development responds to the impacts and causes of climate change by integrating mitigation and adaptation approaches in new development	
Headline	Objective
Accessibility*	Allow equitable access for all to jobs, services and facilities they need, in a way that reduces reliance on car use
Housing	Provide a range of types and tenures of housing that allows people to meet their housing needs
Health, safety and security*	To improve health and wellbeing by encouraging more healthy lifestyles, and protecting people from risk that may impact on their health and/or safety
Community	To support and promote the distinctive character of local communities and community cohesion
Biodiversity*	Protect, value, manage and enhance healthy functioning ecosystems, habitats and natural species diversity, valuing nature conservation interests wherever they are found
Landscape*	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements
Built environment*	To maintain and enhance the built environment for both its visual character and distinctiveness and to create a better living environment.
Historic heritage*	Understand, value, protect and restore, where necessary, the historic cultural heritage of the area, including features of the built and semi-natural environment
Air*	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere to protect from climate change
Water quality	To maintain and improve the quality of ground, surface and coastal waters
Water supply*	To maintain the quantity of water available including potable water supplies, and ground water and river levels
Flood risk*	Ensure that new development is designed and located to avoid the risk of flooding, and ensure the risk of flooding is not increased elsewhere
Minerals and waste*	To ensure that primary materials and minerals are managed in a sustainable way, by safeguarding mineral areas, encouraging re-use and recycling and avoiding final disposal of resources
Land / soil	To use land efficiently by prioritising development on previously developed land where possible, and using existing land efficiently by tackling contamination and protecting higher grade agricultural soil
Energy*	To secure energy efficiency improvements in all new buildings and encourage energy generation from renewable sources.
Employment	Provide a range of jobs within Monmouthshire that help meet the needs of the resident workforce
Wealth creation	Raise prosperity and quality of life by developing a more self-sustaining local economy encouraging indigenous growth

8 Sustainability appraisal of options

- 8.1 An essential component of Local Development Plan (LDP) preparation is considering alternative of ways of delivering development to meet the plan objectives. Alternatives or options as they are often referred to, can be generated for a variety of issues. However, the main issues where options generation is essential are:
- setting the level of development growth for the County, most importantly the number of new homes
 - setting the strategic distribution for new development around the County
 - policy alternatives for key policy issues, such as affordable housing thresholds.
- 8.2 The sustainability appraisal (SA) has a role to play in testing these options, to help refine the alternatives to identify a sustainable choice.
- 8.3 Considering alternatives in this way is a requirement of the Sustainability Appraisal (SA), and particularly the Strategic Environmental Assessment (SEA) process. That requires, *'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' (paragraph 12(2)), are appraised and documented in the SA report'*.
- 8.4 This is reiterated through 'Local Development Plans Wales' (WAG 2005) which states that to be effective Sustainability Appraisal should be fully integrated in the plan making process and should provide input at each stage when decisions are taken. Paragraph 3.6 of the document makes clear that, 'alternative policies, proposals and locations for development should be evaluated wherever appropriate'.
- 8.5 The sustainability appraisal (SA) has helped to form and refine the options that have developed the chosen strategy for the LDP. The SA has been influential through the appraisal of earlier stages of the LDP. Initially Baker Associates prepared an SA report on the options for growth and the distribution of development¹. The purpose was to feed into the process of selecting a preferred option and the sustainability matters that needed to be considered. The findings of the SA of this option appraisal are referred to in LDP background documents on how the levels of growth and spatial distribution of development were derived.
- 8.6 Following this early assessment of the options for growth and distribution a SA was undertaken of the Preferred Strategy, which considered alternatives. The full SA report is available on the LDP website and provides background to this SA. The report, jointly produced by the County Council and Baker Associates is titled, *Initial Sustainability Appraisal (incorporating Strategic Environmental Assessment) Report (May 2009)*. The earlier appraisal of options for growth and development distribution is an Appendix in the 2009 SA report.

¹ Monmouthshire County Council (December 2008) – Monmouthshire Local Development Plan Option Report

SA of options generation

- 8.7 The SA of the Monmouthshire LDP has been through several stages of options generation and appraisal. This started with an assessment of options of an initial options report prepared by Monmouthshire County Council. The SA assessed the sustainability impacts of low, medium and high housing growth and four basic spatial distribution options. A SA report was prepared in February 2009 to feed into the preparation of the Preferred Strategy.
- 8.8 The SA continued to appraise options as part of the assessment of the preferred strategic approach. This was reported in May 2009. This stage of the assessment included stakeholder workshops on the sustainability of the proposed options.

Sustainability appraisal of growth options

- 8.9 An initial simple assessment of growth options allowed the main sustainability differences between different levels of annual housing growth to be highlighted.
- 8.10 The assessment looked at indicative levels of growth of 250, 350 or 475 dwellings a year – as low, medium and high. The SA drew out some clear differences. This includes that the benefits of fewer new homes would be that:
- Less land is required for development;
 - Greenfield sites can be protected with more development accommodated on previously developed sites;
 - Less resources, such as water, energy and materials would be consumed in building development and occupation;
 - Increase in the amount of land that is available for economic development;
 - Insufficient levels of new housing to deliver benefits to new communities from new services; and
 - Biodiversity, landscape and heritage assets could be protected.
- 8.11 However, fewer homes would not necessary mean less homes overall and may simply displace impacts to other parts of Wales or England.
- 8.12 Conversely, the assessment of growth options identified that higher growth levels, could:
- Provide more affordable homes to support diverse communities in Monmouthshire towns and villages;
 - Provide a critical level of population to support local services;
 - Achieve levels of developer contributions necessary to support new services;
 - Create a better match between the location of new housing and the location of employment to help reduce the need to travel; and
 - Help support the local economy.

- 8.13 The actual levels of growth proposed for the LDP has been through several iterations from the first options appraisal. This has been the result of changed population projections from WAG and as a result of further consultation and evidence gathering as part of plan making. This has factored in considerations such as population and household change, previous housing completions and capacity.
- 8.14 The final figure that has been decided for growth relates to the 'medium' level of 350 homes a year. However, due to the market downturn there are less homes being built in recent years, than this 350 target, therefore there is a need to deliver 400 homes a year.
- 8.15 The SA does not review the evidence on which this is based, although in terms of seeking sustainable development it should help in delivering more affordable housing than a lower figure. However, the Council will need to ensure that this figure is not too low to provide sufficient economically active people to meet the economic potential of the County.
- 8.16 Economic growth options for the County were not part of the earlier SA, as no detailed figures were provided on these. The LDP does have quite a large landbank of sites for employment growth, especially in the south of the County where available land is more plentiful. A review of employment allocations from the Unitary Development Plan was undertaken for the LDP, allowing those sites with little hope of coming forward for employment to be removed. In helping to achieve sustainable development this is a positive step by allowing land to be reallocated for more appropriate uses, including housing.

Distribution of development

- 8.17 The other principle issue on which options were developed is the distribution of the development growth around the County, in order to meet the LDP objectives. Initially an SA was completed of four spatial options as part of the LDP Options Report in February 2009. This report can be found in Appendix 2.
- 8.18 The SA of the options identified several potential sustainability differences between the four basic approaches.
- 8.19 Option A was to focus development within or adjoining the three main towns. The sustainability implications included:
- Better accessibility to a range of services for future residents;
 - Better potential for reducing car use and promoting more sustainable transport choices;
 - Supporting the economic role of these towns;
 - Limiting availability of affordable homes in other settlements;
 - Preventing the needed housing growth to support employment in the Severnside area and the rural economy; and

- Greater greenfield land requirement to accommodate growth, with possible adverse impacts on sensitive environments, especially at Abergavenny where land is limited.

8.20 Spatial Option B was to focus development on the 'Sevenside' area around the M4 corridor. The sustainability implications of this option included:

- High levels of new housing is likely to be most effective in delivering and supporting new community services to the area;
- New housing may help stimulate further economic growth in the area, as a large proportion of the new employment land is available here;
- Higher quality greenfield sites in other parts of the County would be protected from change;
- Focus of development here may exacerbate current low levels of self-containment for work and encourage increased levels of longer distance car commuting;
- Lack of town centres in this area with high levels of service provision may result in increase in car use for shopping, leisure and access to health services;
- Would limit availability of affordable homes in other settlements; and
- No previously developed sites available in this location with the majority of growth having to be on greenfield land.

8.21 Spatial Option C was to focus development proportionally across rural and urban areas to meet housing needs evenly throughout the County. The sustainability implications of this option included:

- Some accessibility advantages by helping create or maintain a population level to support local services in medium sized and smaller settlements;
- Accessibility disadvantages as more development may take place in locations with poor access to services and public transport;
- Pattern of development is unlikely to be sustainable in the long-term with increasing private transport costs;
- Would help to meet affordable housing needs throughout the County, including in rural areas;
- Distributed development is most likely to be able to choose the sites with least environmental impact, as all development sites would be smaller;
- Would help protect the existing character of settlements; and
- Levels of development will be insufficient to deliver new community, transport and other infrastructure.

8.22 Spatial Option D was to focus development on sites and settlements where opportunities exist for large scale mixed development. The sustainability implications of this option included:

- Mixed use development can help provide accessible jobs and services, reducing the need and distance travelled and helping reduce car dependence;

- Large development sites present greater opportunities for sustainability, including creating sustainable communities, opportunities for low carbon energy from combined heat and power, integration of ecology, new services etc;
- Such sites may be attractive to some employment types, such as offices, although less attractive to industrial development;
- If urban extensions are of an insufficient size the potential sustainability advantages could be lost;
- Towns and villages not selected for growth would suffer from lack of investment and provision of affordable new homes;
- Large urban extensions could adversely impact on the character of smaller settlements; and
- Does not address currently unsustainable travel patterns elsewhere in the County.

8.23 The Preferred Strategy chose a hybrid of these four options. This choice was in some way influenced by the SA as well as the needs of the plan area. The advantage of the hybrid approach was it allowed most development to be focused in the main towns, supporting greater accessibility. While some development in other settlements allows the affordable housing to be provided elsewhere in the County, helping to support sustainable communities. In addition the 'Severnside' area needs sufficient new housing to support the delivery of new community services and employment in these locations. Therefore out-commuting and car travel could be reduced in these locations. The SA of the hybrid option undertaken in February 2010 can be found in Appendix 3.

8.24 The SA identifies that the preferred strategy does have risks associated with it. The desired approach will help in making a pattern of development that could reduce commuting by providing a better match of jobs and homes. However, the characteristics of jobs and resident workforce in Monmouthshire will always mean that self-containment is a difficult objective to achieve. Development in the Magor/Undy area, in particular, needs to be matched with a growth in available local services to reduce car travel and help support stronger community character.

9 Sustainability appraisal of the vision and objectives

9.1 The Deposit LDP provides:

- a summary of the policy framework which places the LDP in context, explaining its role, the scope available for what it can say, its chain of conformity and its status.
- a profile of the County, which performs the useful role of identifying and summarising the needs that the LDP should have some role in addressing. This description includes issues that are central to the pursuit of greater sustainability through the way change is managed and development provided for.
- a Vision, together with a set of objectives identifying those things that will have to be brought about if the place characterised in the vision is to come about.

9.2 The presence of these components in the document is supported by the sustainability appraisal (SA), as they all assist in demonstrating what the plan is seeking to achieve and how. Some aspects could be better – for instance, the objectives are generalised statements of what most reasonable people would agree would be ‘a good thing’, rather than being particular and evidently appropriate to the place. However, there is no suggestion that the plan is heading in the wrong direction on sustainability issues.

Vision

9.3 The Vision for the LDP has been developed from a public consultation exercise and is based on what have been identified as the main issues facing the County, which the LDP can help to address.

9.4 The Vision is positive in terms of creating a better place to live, and addressing principle sustainable development considerations in the area. This includes reducing car travel and improving access to services, while at the same time aiming to reduce impacts on the natural and built environment.

9.5 The Vision includes elements that break the overall aims down into spatially specific statements on how the Vision will be achieved. The difference between these statements and the objectives that follow is not clear.

Objectives

9.6 Appendix 1 shows an appraisal of the LDP objectives against the objectives for sustainable development developed as part of the SA. The appraisal shows the proposed LDP objectives are compatible with meeting sustainability objectives. They demonstrate a positive approach to delivering development in Monmouthshire that should aid sustainability.

9.7 The objectives should also aim for a consistent level of detail in how they present issues. For instance, only two of the objectives are spatially specific, some contain

detail of delivery and others are very brief. Therefore, although the objectives cover the range of sustainability issues, there may be scope for adjusting their wording to add a layer of spatial detail and a consistent approach to help deliver a more coherent set of objectives for the development of Monmouthshire.

9.8 By including more specific spatial matters in the vision and objectives it could help in choosing the most suitable strategic growth and development distribution options for the LDP, and therefore help to deliver sustainable development. Therefore, objectives could contain spatial elements, such as:

- the towns and villages should be protected from development, due to the character of their built or natural environment
- the towns or villages in need of regeneration or diversification of services, and/or
- towns and villages could be the focus of economic activity.

10 Sustainability appraisal – the spatial strategy

Introduction

- 10.1 Getting the strategy right, in terms of its contribution to sustainable development, is essential in helping to create a sustainable LDP that will shape the future pattern of development and contribute to more sustainable ways of living.
- 10.2 One of the principal roles of a spatial strategy is to deliver more sustainable development by reducing reliance on car travel. This can be done through policies which support public transport improvements, walking and cycling routes. However, more important than this is a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place. This includes frequency and number of trips and access from homes to jobs, schools, shops, health services and other community facilities.
- 10.3 In Monmouthshire high levels of commuting in and out of the County for work are identified as having a major impact on sustainable development. Some settlements of the County suffer from a very large proportion of working age residents leaving the area for work every day by car. This means little of their day-to-day business is conducted, such as working, shopping, socialising or partaking in leisure activities, near where they live. Therefore, reducing the length of trips for work should help reduce car reliance, as well as the length of commuting trips.
- 10.4 There are many sustainability impacts of high levels of commuting. For example, lack of links between where people live and work can impact on community character and peoples quality of life. There will also be the inevitable impacts from increased car use, such as contribution to climate change, air pollution, and health impacts. Road congestion, exacerbated by commuter travel, can also have socially adverse effects on communities, health and adverse effects on the economy.

The SA of policies

- 10.5 The LDP contains seventeen strategic policies covering all policy areas of the plan. The SA Report shows the appraisal of these policies against the objectives for sustainable development, this is shown in appendix 4. The policy appraisal provides the detailed analysis of the performance of strategic policies, with this section of the SA reporting on the sustainability implications of strategic decisions.

The LDP housing strategy

- 10.6 The LDP strategy is to seek a shift in the balance of population a little towards the main settlements, whilst also providing for some development to take place in more important (in terms of their service role) smaller settlements.
- 10.7 The Main Settlements that are to be the focus for development were identified for their particular characteristics. These characteristics include the amount of

employment that is available, the level of services and facilities, as well as the need for regeneration and improvement. Chepstow and Abergavenny are also identified through the Wales Spatial Plan as principal towns in Monmouthshire. These settlements offer the greatest prospect of shortening the trips people make, reducing the transport related environmental, social and economic impacts.

- 10.8 A decision has also been made to focus the new allocation of land in the Main Towns on individual large sites, rather than distributed around the settlements. This will help make sure that developer contributions will be at a level that will be able to provide new infrastructure and community facilities. The sustainability benefits of this will be to help in creating sustainable communities, with good local services, rather than simply new peripheral housing estates.
- 10.9 Development is also permitted in larger and some smaller rural villages. Allowing development to take place in these types of settlement, subject to the type of housing provided, gives the prospect of maintaining those communities. This can be achieved by addressing housing needs where they arise and bringing new demands on existing facilities making it easier for them to survive. Therefore, allowing development in these locations secures social benefits and potentially reduced car use by having accessible local services.
- 10.10 There is proposed to be a proportional shift in the relative sizes of different settlements. Policy S2 sets the strategy for housing provision and Policy S1 identifies the hierarchy of settlements for housing growth. For example by 2021 the share of dwellings:
- In the main settlements of Abergavenny, Chepstow and Monmouth are to be an additional 0.2%;
 - In the 'Severside' towns and villages of Cadicot/Portskewett, Caerwent, Magor/Undy, Rogiet and Sudbrook would see their proportional share increase by 0.61%; and
 - In the rural area (including Main Villages) is anticipated to decrease its share of dwellings by around 0.8%. A large proportion of these new homes will be to meet affordable housing needs.
- 10.11 The selection of the exact locations for growth followed an assessment of the sites put forward for development in the Candidate Site Assessment process, in addition, sites that the Council were already aware of were considered.
- 10.12 The site assessment process is covered in greater detail in section 11 of this SA Report. This section considers if the process used to select sites for allocation would help identify those that were best able to accommodate sustainable growth. Part of this consideration for more rural areas is also the choice of settlements to include either as Main or Minor Villages.
- 10.13 These villages were decided by the plan makers based on:

“detailed analysis of their ability to accommodate development at the chosen locations - the environmental and infrastructure capacity of the individual settlements - and an assessment of different site options that have come forward.”

10.14 These detailed analyses are set out in individual settlement reports provided as background papers. The evidence on the ability of a settlement to accommodate growth is vital for achieving social sustainability. If new homes in rural areas are allocated in villages with poor access to services and residents would almost entirely be reliant on car travel there is a real risk of rural isolation. Many of the new rural homes will be to meet affordable housing needs. The costs of private travel are increasing, so there is a real risk that rural households or members of households could become cut-off from services to meet their day-to-day needs and access to employment. The elderly are also at risk from rural isolation.

Affordable housing

10.15 Affordable housing is included as part of the spatial strategy. The approach that the plan takes to affordable housing can have impacts on creating more sustainable patterns of movement in and out of Monmouthshire for work.

10.16 The pattern shows that a large amount of people move out of the area everyday for work, travelling to areas including Newport, Cardiff and outside Wales. However, there are also a large amount of people moving into the area each day for work, coming from nearby towns and villages.

10.17 One of the causes of this high level of in-commuting is likely to be the lack of affordable housing in the County, and the fact that jobs in Monmouthshire are characterised by lower wages. This means many people who want to work in Monmouthshire may be priced out of the County, finding homes more affordable outside Monmouthshire whilst continuing to work in the County.

10.18 The high quality natural environment and good links to cities such as Cardiff and Bristol mean more people choose to live in the area because of a perceived higher quality of life, but remain working in jobs outside the County.

10.19 Therefore, the provision of new affordable homes in proximity to the jobs that exist in the County is essential to help reduce the distance that people commute. This is in addition to providing new employment sites that could provide new jobs to match the skills of the resident population.

10.20 The longer-term sustainability goals may be to improve the skills and value of jobs available in Monmouthshire, rather than provide more affordable housing to meet current job provision. However, for the near and medium future providing more affordable housing in Monmouthshire is a realistic way to help reduce commuting.

10.21 Policy S4 of the strategy covers affordable housing, setting the standards for provision. Through the adoption of low thresholds for affordable housing Policy S4, as drafted, is ambitious and progressive in its approach. For all parts of the County

targets are quite ambitious and should help deliver a quantity of housing that will help meet local needs. The greatest need for affordable homes will be in rural areas and the highest targets are set for these locations. There is an ambitious 60% target for providing affordable housing on allocations in rural areas. Furthermore, small developments in Minor Villages will need to provide up to 75% affordable. These proportions clearly show that there is an expectation that rural housing is for affordable needs, while allowing some market housing to help deliver these sites that is necessary to achieve sustainability benefits.

- 10.22 Background evidence is required to show that these levels of affordable housing can be provided and ensure the policy can be implemented successfully. It should help to ensure that it is possible to support this policy through to LDP adoption and then on a case-by-case basis in implementation through development management decisions.

Employment

- 10.23 The link between jobs and homes is an important one. It would be unrealistic to imagine that in Monmouthshire very high levels of self-containment could be achieved for any town. However, seeking to improve levels of self-containment for jobs and homes should be an objective of the LDP. Part of this will be directing new employment and jobs to areas where there is a current lack of provision, or where housing growth has outstripped employment growth in recent years.
- 10.24 There is also a problem in Monmouthshire in providing jobs that match the skills of residents. Many of the resident population of the County have more qualifications than the average for Wales. However, the jobs on offer in Monmouthshire are characterised by low wages. To plan sustainability for the County a strategy needs to be put in place to bring higher quality jobs to the County.
- 10.25 The LDP allocates over 50 ha of new employment land, well beyond the need based on past take-up rates. Much of this land is in one location which already has planning permission. Therefore, additional sites must be allocated to provide a range of sites and premises to meet diverse employment needs throughout the County. This allocation figure has also been reduced from earlier proposals following a review of employment land. This review considered sites to make sure they are fit for current business needs. This has resulted in some sites being re-allocated for more suitable land uses. This review is supported in terms of finding the most suitable, and sustainable, use of land.
- 10.26 The plan does not very effectively address new job creation and its relationship to housing. For instance the LDP does not explicitly show how the strategy is addressing the need to provide a better balance of homes and jobs in any of the settlements. A better balance would have environmental and social sustainability benefits from reducing the need to travel longer distances to access employment.
- 10.27 A large amount of the new employment land is allocated in the M4 corridor, particularly in the Magor/Undy area. There is already a large amount of residential

development in the area with more land allocated. Many residents commute out of the area by car for work. Development of employment in these locations may have some impact on reducing out-commuting in the surrounding area, with benefits for reducing car use. However, the scale of the allocations (39ha at Magor Europark) and the M4 location does mean that if the site is fully developed it is very likely to increase car travel, encouraging inward commuting.

- 10.28 The site may perform a regional role in Wales. However, development of this site may not perform very well in creating a pattern of development that will contribute to long-term sustainability.
- 10.29 New employment allocations in other parts of the County are more limited. This may have an impact on self-containment of jobs and homes in these areas. However, for all of the Main Towns of Abergavenny (including Llanfoist), Chepstow and Monmouth new housing and employment land is allocated. For instance, there are allocations for 400 new homes in Monmouth matched by 6.5ha of new employment land. This could help retain employment self-containment in the town, which already has one of the highest levels in the County.
- 10.30 Protection of existing employment land is also covered in strategic policy S9, with the details of implementation in development management policy E1.
- 10.31 The LDP could contain more information on the match between homes and jobs and how this relates to the overall strategy and objectives for the LDP. Phasing release of some housing sites in line with new employment delivery would help to ensure that new homes are not built in areas of poor employment or create, or exacerbate, 'commuter towns' with high levels of car commuting for work and local services. The risk of this approach is that housing delivery is slowed down, potentially pushing up housing costs.

Retail

- 10.32 The location of new retail development can have an impact on the strategic pattern of development by helping reduce the need to travel by car. Policy S6 sets out the strategic policy approach to retail development, with the overall objective of continuing to support town centres. This is compatible with sustainable development as these are likely to be the locations that are most accessible to people with best public transport connections. In addition, having many services in one location can help reduce the overall number of trips people need to make.
- 10.33 The policy in the LDP will need to ensure that it contains sufficient detail to prioritise retail development in town centres. This will include the need to make sure that policy criteria provides the tools to refuse retail development in locations where it could have an adverse impact on town centre viability.

Infrastructure

- 10.34 Provision of all types of infrastructure is an essential part of making a sustainable place. Policy S7 covers infrastructure provision, setting out the financial contributions which may be required to contribute towards a range of infrastructure types, these include:
- Hard infrastructure such as utilities networks and road;
 - Green infrastructure such as new planting and open space; and
 - Community infrastructure such as schools and health centres.
- 10.35 The policy helps to show developers the range of issues where contributions may be required, so these can be part of discussions on planning applications and financial decisions. However, more detailed information may need to be gathered on these issues to help define anticipated contributions. This may make up part of a Community Infrastructure Levy in the future.

Sustainable Development and Flooding

- 10.36 Policy S11 of the LDP tackles issues related to delivering development that is more sustainable in its construction, and avoids flood risk. These are important considerations to help reduce the impact of the development growth to be delivered through the LDP. More information on these issues could be included in this strategy section of the LDP, rather than having all the information in the development management policies.

Nature Conservation and Landscape

- 10.37 Monmouthshire has a very high quality natural environment. In and directly adjacent to the County (including within the Brecon Beacons National Park area) there are eleven sites designated for their international importance for nature conservation, many of which are made up of multiple smaller sites.
- 10.38 Two stages of screening for a Habitats Regulations Assessment have been carried out to identify if there is a potential risk to these sites by new development proposed through the LDP. The screening of the LDP is confident that subject to careful policy wording and the need for site specific assessment, as necessary, significant impacts on the internationally designated nature conservation sites can be avoided.
- 10.39 The policy is worded well and should help make sure that all of the green spaces of the County are a consideration of planning decisions, and their multi-functional role is recognised. Further work on the existing and potential for the Green Infrastructure network in Monmouthshire could help in the implementation of this policy.

Waste

- 10.40 The strategic policy on waste is quite simple and seeks to reduce waste to final disposal. The plan does not allocate any sites but identifies the need for 5.6 ha of land to meet identified needs.
- 10.41 There is a real need in Monmouthshire to keep reducing the quantity of waste sent to landfill. The Council needs to allocate sites near to the source where it can be managed more sustainably according to the waste hierarchy, discouraging final disposal of recoverable resources.
- 10.42 Ideally, the LDP should identify sites for specific types of waste, especially landfill. This would allow people an opportunity to comment and respond to the suitability of allocations. Waiting for sites to come forward through the planning application process may hinder the delivery of sites.

Minerals

- 10.43 The LDP states that no new mineral abstractions are required over the plan period, so there will be no additional impacts from land based mineral abstraction.
- 10.44 In sustainability terms there is no real sustainable way of exploiting limited mineral resources. However, policy S15 supports safeguarding these resources for future use, which means they will not be made unavailable for later exploitation by inappropriately located development.
- 10.45 The SA and HRA screening note that new sand and gravel dredging in the Severn Estuary could have an adverse impact on this internationally designated nature conservation site. It will not solely be the role of Monmouthshire County Council to manage these impacts, but ways of identifying and mitigating impacts will need to be found through working with neighbouring mineral authorities in Wales and England along the Severn Estuary.

Transport

- 10.46 Several of the policies of the Preferred Strategy include measures to promote more sustainable travel. This is in addition to reducing car use through the spatial strategy, supporting development patterns that lessen the need to travel and the length of trips.
- 10.47 Policy S16 deals directly with issues of transport. The aim of promoting alternatives to car use on all sites is strongly supported in helping achieve more sustainable development. Ideally, all new development should have good access by a variety of travel modes, providing real and attractive alternatives to travelling by car.
- 10.48 The policy also lists road improvements that are to be supported through the Regional Transport Plan and the LDP. These will often be beyond the direct control of the Council, driven instead by the Welsh Government. Although, road improvements can have sustainability benefits, including for the economy, their long-term sustainability is poor. New roads can encourage car use, and in the end

congestion reaches current levels. Increased car use can also have a range of adverse sustainability impacts, including on air quality, health and climate change.

- 10.49 There will always be a need for personal transport in Monmouthshire. It is a rural County, with many villages and parts of the countryside being located quite some distance from essential shops, service and jobs. Therefore, in Monmouthshire it would not be possible to provide scheduled bus services to all villages and hamlets.
- 10.50 However, the LDP strategy and policies should aim to change the future patterns of development so more homes are built in more accessible locations, avoiding growth in villages with very little potential of a bus link. Except in very limited circumstances, no new development should be built in Monmouthshire where there is not some affordable alternative to car use for making medium to long-distance trips, essential in reducing rural isolation. In the towns every attempt should be made to limit people's reliance on car, as in part trips within their town and travel to work. In towns and locations that have the population to support local services, reducing car use is essential in delivering sustainable development.
- 10.51 The new M4 (Magor to Castleton) is a scheme that is led by the Welsh Government, and therefore beyond the control of the Monmouthshire LDP. However, this scheme performs poorly in sustainability terms. Environmental and social impacts could be significant, including on the internationally designated Severn Estuary and the nationally designated SSSI on the Gwent Levels. New communities that will be near the route of the new road will also be adversely impacted on, with potential health and noise impacts and some communities becoming increasingly cut-off and suffering proportionally more than other communities from the impacts of road development.

General comments

- 10.52 The LDP is a lengthy document with a large number of policies, many of which contain similar policy criteria and cover similar issues. This does not mean that the plan will necessarily perform any worse in achieving sustainable development. However, a more succinct plan may be easier to use and therefore make sure all aspects of sustainable development are taken into account.
- 10.53 The plan is arranged so that strategic policies are separated out from the development management policies. For some issues this separation is useful, for instance those showing the strategic distribution of development. However, for others combining the strategic policies with the sections containing development management policies may make for a more useable plan.
- 10.54 Examples of where the strategic and other sections could be combined are for the natural environment, enterprise, waste, minerals and transport. In the LDP some of the strategic policies take the form of a generalised introduction to the topic with the later development management policies covering the same issues. A single section

would help avoid duplication of policy criteria coverage and may help create a more useable plan.

- 10.55 Another way to create a more succinct plan would be to change the way the policies are written. This would see the style of the policies change from their current form, where policies, often containing very similar criteria, are created to respond to different type of development. For example the plan contains polices on golf courses, employment in the countryside, residential in the countryside, caravan sites etc. The alternative would be to have a fewer number of policies written to include criteria that state what is wanted from development. Policies in this style would cover single topic areas, such as natural environment protection, provision of community services and public transport accessibility. This style of policy would enable all proposals to be tested against the same set of criteria to determine whether they would make the place more or less like what is sought by the LDP vision and greater sustainability.
- 10.56 This method of writing policies could significantly reduce the length of the plan and therefore its legibility. Improvements to clarity of what is wanted can only have benefits for implementation and therefore achieving more sustainable outcomes. Policies could contain a combination of:
- Policies identifying the main elements of provision, dealing with the housing primarily;
 - Policies dealing with specific components of development; and
 - Policies setting criteria for the consideration of development proposals according to their fit with the overall strategy.

11 Site allocations

- 11.1 The LDP contains sites allocated for housing, employment, waste and tourism. This includes five strategic sites that will accommodate a mix of uses. These sites have been selected following a site selection process by the Council.
- 11.2 The choice of site allocations was the responsibility of the plan-makers and the method for site selection is shown on the Monmouthshire LDP website¹. The sustainability appraisal only considers the method that was used in site selection, including selection criteria, for its suitability in helping select the more sustainable sites.
- 11.3 The policy appraisal in Appendix 5 shows the SA of the site allocations policies. This reviews the information identified in the site selection process to identify what the main sustainability issues might be of delivering the allocated sites. With the aim of identifying what particular mitigation may be required to deliver sites sustainably.
- 11.4 It is not the intention of the SA to review the findings of the selection process nor comment on the accuracy of information, it is simply to assess the compatibility of the selection process with objectives for sustainable development.

Site selection

- 11.5 As part of the pre-deposit stage of preparation, land-owners, developers and the public were asked to nominate 'Candidate Sites' for consideration for inclusion within the Monmouthshire Local Development Plan (LDP). Submissions were collected from January 2008 until April 2009 during the time the preferred strategy was being prepared.
- 11.6 A long list of sites were submitted to the Council that the plan-makers had to refine down to a set for allocation.
- 11.7 The process of site selection was through several stages and was different for identifying strategic site allocations and then the smaller site allocations. Following agreement on the preferred strategy and choices made on the rural settlements that could accommodate growth it was then possible to further assess site suitability. Sites that did not conform with the preferred strategy were excluded from further consideration. This is compatible with finding sustainable sites, as the preferred strategy was assessed as part of the SA and found to be effective in helping move towards more sustainable development.
- 11.8 Sites were all subject to assessment against criteria to assess the suitability of the site. The criteria used for assessment are shown in Appendix 8, they have been compared to the sustainability objectives established for the SA.

¹ Monmouthshire County Council (April 2009) *Candidate Sites Assessment Process and Criteria Sustainability Appraisal Report of the Monmouthshire County Council Deposit LDP (June 2011)*

11.9 The comparison shows that the site assessment criteria are compatible with the sustainability objectives. There are site selection criteria that relate to the majority of sustainability objectives, thereby helping in choosing sustainable sites, although there are some gaps. However, gaps predominately relate to sustainability objectives that are not closely related to the location of development and will be more influenced by the delivery and type of development. This includes sustainability objectives relating to water quality and supply, air quality, housing, waste, minerals and employment.

11.10 Sustainability objectives that have a strong relationship with the location of development are covered well in the site selection criteria. These objectives include:

- **Accessibility:** Several criteria seek to assess how accessible sites will be to existing services, including shops, schools and public transport. Sites that have worse access are rated more poorly than those with good access. Accessibility is also addressed in criteria to protect rights of way and access to local 'good neighbour' employment.
- **Impacts on biodiversity:** The criteria cover various aspects of biodiversity protection, including impact on designated sites (international, national and local) and protected species. Landscape criteria also are likely to be useful in identifying natural features that link habitats.
- **Impacts on landscape:** The criteria cover various aspects of landscape protection, including impact on designated sites. However, recognising that much countryside of the County is of a high landscape quality the sensitivity of landscapes and capacity for change has also been assessed. This allows sites to be identified that may be in designated areas but could accommodate development without significant detriment to the wider landscape.
- **Impact on historic heritage:** This sustainable issue is covered through identifying relationship with protected areas and buildings, as well as archaeological potential.
- **Health:** Protection of people's health and wellbeing is well covered by site selection criteria related to access to non-car modes of travel. Criteria that helps to identify where a site may put people at risk also will protect health.
- **Wealth creation:** The high quality built and natural environment within the County has an important role to play in making the area attractive to inward investment and for tourism. Therefore, criteria that helps to identify and protect these assets will have a benefit for the economy. Similarly, good transport access will be favoured by investors, so these criteria also are compatible with the sustainability objective on wealth.
- **Land:** There are several criteria that relate well to the sustainability objective on land. These criteria identify if the site is brown or greenfield and also the agricultural land quality.

11.11 Information was gathered on the site criteria for all sites with strategic potential and smaller sites that were compatible with the Preferred Strategy. Completed site

assessment matrices are available on the Monmouthshire LDP website that demonstrate the performance of each site.

- 11.12 The site assessment matrices did not use a scoring system for evaluating the relative performance of sites. Instead, a 'traffic light' colour was attributed for each site against a pre-determined criteria. For example, a site in a designated area will be 'red', adjacent to a designated area it would be 'orange' and no relationship with such an area would be 'green'. This system is preferable to a quantified scoring system as it clearly shows where a site performs poorly against certain criteria, rather than generating a final score that averages out the positives and negatives from any site. A comments section in the matrix allows for complexities and uncertainties in site evaluation to be recorded to provide a full evidence base on which to select sites.
- 11.13 In addition, to the site selection criteria evaluated other criteria are used in the assessment of sites, these relate to site availability and financial viability. This is essential as a site should only be allocated where there is reasonable confidence it can be developed in the plan period. Making sure sites are available and development costs will not make the site unviable are an essential part of making sure allocations can be delivered and LDP development targets are met.
- 11.14 The final choice of sites by the plan-makers was based on a weighing up exercise of the positives and negatives of the sites. It was considered how it would fit within the chosen strategy, such as ensuring that development is not concentrated in any one smaller village. Resulting in the final allocation of sites as shown in the Deposit LDP.

Selected sites

- 11.15 Appendix 5 shows the SA matrices of the site allocation policies. These show that there will be matters that need to be addressed in the development of all the allocations to ensure potential sustainability adverse impacts are mitigated.
- 11.16 The majority of sites are on greenfield land and therefore loss of open space and some high quality agricultural land will be inevitable. There is no way to mitigate against these impacts fully, even where topsoil is reused elsewhere and development is screened. Of the strategic sites only Fairfield Mabey in Chepstow is a previously developed site. Therefore, it is essential that this land is used efficiently with housing densities helping to create attractive places to live that will support the development of community identity.
- 11.17 Several of the sites have the potential to have impact on nature conservation. The Habitats Regulations Assessment does not identify the potential for significant adverse impacts of allocations on internationally designated nature conservation sites. However, there will be changes to the habitat character of many sites and new development will have to be designed and delivered in a way that avoids impacts or helps create new or replacement habitats. Some sites may also require

site specific appropriate assessment under the Habitats Regulations, depending on the type and scale of development proposed. Sites where nature conservation impacts may need specific mitigation, include:

- **Strategic sites:** SAH1 Deri Farm, Abergavenny; SAH2 Fairfield Mabey, Chepstow, SAH4 Wonastow Road, Monmouth.
- **Housing sites:** SAH6 Tudor Road, Wyesham; SAH 7 H7(i) Usk; SAH8 H8(ii) Devauden; SAH8 H8(vii) Llandogo; SAH8 H8(viii) Llanellen; SAH8 H8(x) Llanishen; SAH8 H8(xi) Llanfair Kilgeddin;
- **New employment sites:** SAE1b Quay Point, Magor; SAE1c Gwent Europark, Magor; SAE1f Newhouse Farm, Chepstow; SAE1g South Woodside, Usk

11.18 Due to the high landscape quality of much of the countryside in the County quite a few of the sites will need to be screened through landscape planting. The positioning of new buildings on sites can also help reduce the visual impacts of development. Sites where design and layout may need specific mitigation to avoid adverse impacts include:

- **Strategic sites:** SAH2 Crick Road, Portskewett; SAH5 Rockfield Farm, Undy
- **Housing sites:** SAH6 Tudor Road, Wyesham; SAH H7(i) Usk; SAH H7(ii) Raglan; SAH H7(iii) Penperlleni; SAH8 H8(i) a&b Cross Ash; SHA8(ii) Devauden; SAH8 H8(iii) Grossmont; SAH H8(vi) Llanddewi Rhydderch; SAH8 H8(vii) Llandogo; SAH8 H8(viii) Llanellen; SAH8 H8(ix) Llangybi; SAH8 H8(x) Llanishen; SAH8 H8(xi) Llanfair Kilgeddin; SAH8 H8(xiii) Penallt; SAH8 H8(xiv) Pwllmeyric; SAH8 H8(xv) Shirenewton; SAH8 H8(xvi) Trellech
- **New employment sites:** The majority of the sites have the potential to have landscape impacts as they are on the urban periphery – with the exception of sites in South Woodside, Usk and Pill Row, Caldicot.

11.19 There is much historic heritage in the County, both as built heritage and as part of landscapes. The design and layout of buildings on allocated sites will need to consider impacts on protected areas. This can be achieved through high quality design that respects the setting whilst protecting views and vistas. Sites where impacts on historic heritage will need to be taken into account include:

- **Strategic sites:** SAH2 Crick Road, Portskewett; SAH2 Fairfield Mabey, Chepstow; SAH4 Wonastow Road, Monmouth
- **Housing sites:** SAH7H7(ii) Raglan; SAH8 H8(iii) Dingestow; SAH8 H8(iii) Grosmont; SAH8 H8(vii) Llandogo; SAH8 H8(viii) Llanellen; SAH8 H8(ix) Llangybi; SAH8 H8(xi) Llanfair Kilgeddin; SAH8 H8(xii) Mathern; SAH8 H8(xiv) Pwllmeyric; SAH8 H8(xv) Shirenewton; SAH8 H8(xvi) Trellech
- **Tourism sites:** The sites allocated for possible future use as tourism all have the potential for impact on the historic built and/or landscape heritage.
- **New employment sites:** SAE1h Pill Row, Severnbridge IE, Caldicot

11.20 New development must not be delivered where it puts vulnerable uses at undue risk of flood. This includes areas allocated for housing, sites include:

- **Strategic sites:** SAH2 Fairfield Mabey, Chepstow, SAH4 Wonastow Road, Monmouth

11.21 Employment sites also have the potential to impact on residential amenity, and this will need to be taken into account in the type of development permitted and the layout of development on site. Sites where the impact may be greatest include:

- SAE1d Westgate Business Park
- SAE1g South Woodside, Usk

11.22 Other sustainability issues identified in the site assessment process included:

- the need to avoid contamination impacts
- compensation or retention for the loss of the routes of existing Rights of Way
- avoiding direct pollution impacts on surface waters, especially from several employment allocations near rivers, streams and ditches.

11.23 Other sustainability issues that the majority of allocations will need to address as part of their development include securing good quality non-car access. Many of the housing and employment allocations are in peripheral locations. To help people get access to town/village and local centres new footpaths and cycleways will be needed. To encourage people to walk or cycle, routes should be of a good of good quality design in terms of landscape features or points of interest, be safe and more importantly be as direct as possible. For larger sites that will attract many new trips, new public transport routes or stops will need to be integrated into development. Strategic sites where walking/cycling and/or public transport improvements will be essential include SAH5 Rockfield Farm in Undy, that is some distance from services and SAH4 Wonastow Road in Monmouth that is separated from the main urban area by a business park.

11.24 Some of the smaller housing allocations have very poor accessibility to services and will therefore not meet sustainability objectives relating to equitable access. These housing sites are: SAH H8(i) a&b Cross Ash; SAH8 H8(vi) Llanddewi Rhydderch; SAH8 H8(xi) Llanfair Kilgeddin; SAH8 H8(xiii) Penallt.

12 Sustainability appraisal of policies

- 12.1 Appendix 4 contains the full sustainability appraisal (SA) of the strategic policies of the LDP and appendix 6 contains the SA of the development management policies. The matrices show a comparison of the policy with the sustainability objectives to provide a systematic assessment of impacts.
- 12.2 The matrices also contain a commentary on the main impacts identified in the policy and possible ways of mitigating any impacts. Mitigation can be through a variety of means including implementation of other policies, through other plans and strategies or through developer contributions. Mitigation is covered in greater detail in section 13.
- 12.3 This section of the SA report looks at the relationship of the plan with each of the objectives for sustainable development, which were developed specifically for the SA. The purpose is to identify where there is the potential for policies to have a positive or negative impact on achieving sustainable development. Appendices 4 and 6 containing the full policy appraisals should be read in conjunction with this text for a complete report on the assessment, impacts and recommendations.
- 12.4 This summary of impacts against sustainability objectives does reveal the potential for policies to have both a positive and negative impact against the same objective. It is also evident that some policies that will help meet one objective will have negative implications for meeting another.

Allow equitable access for all to jobs, services and facilities they need, in a way that reduces reliance on car use

- 12.5 An objective of the plan is to provide better link between where people live and work, the benefits of achieving better access to employment. Policies also address better sustainable transport access to new development. However, the LDP also has the potential to deliver development with less good access to services, such as that in rural areas.
- 12.6 Potential positive impacts:
- Locational policies of the plan set out this strategy including Strategic Policies S1 and S2 and development management policies H1, H2.
 - Policies of the plan set out the need to retain and enhance retail offer in the County. Policies RET1, RET2 and RET3 all seek to focus retail in accessible town centres and protect local shops.
 - The plan contains policies aimed at creating new employment opportunities in the County. There are also specific policies (S10 and RE1, RE2) that encourage rural enterprise that could help improve access jobs for rural communities.
 - Policies that help protect and enhance walking and cycling routes could have benefits for access. MV3 relates to Public Rights of Way and MV4 to cycleways. Green Infrastructure improvements may also improve walking and cycling routes, through policy G11. Policy MV6 seeks to protect the routes of canals and old

railway lines from inappropriate development to protect their use for sustainable transport.

- Movement and transport policies include the need to ensure improvements to non-car access. Strategic policy S16 lists transport improvements and promotes sustainable access. The strategic policy is backed up by several development management policies, including MV2 on non-car access and MV5 on transport interchanges.

12.7 Potential adverse impacts:

- Anticipated large employment growth in the Severnside area may mean northern parts of the County do not have so many employment opportunities.
- Employment growth allocations in the 'Severnside' area outweigh planned housing growth, this could lead to delivery of jobs that are only really accessible to car users.
- Policies of the plan permit development in rural villages, some with poor access to facilities. Residents in these locations may have difficulty accessing essential services if they cannot drive.
- The re-use of buildings in the open countryside is permitted for employment use subject to conditions, these locations will have poor access to services.
- Policy EP4 on telecommunications systems could harm delivery of these systems, broadband and mobile communication are essential for home-working and easy access to services, especially in rural areas.

12.8 Recommendations for mitigating impacts:

- If employment is permitted in the open countryside or rural areas it must provide evidence of why a rural location is necessary and be of a scale suitable to its location in order to limit un-sustainable commuting patterns.
- The potential for phased release of housing to match employment growth (or vice versa) could be used to prevent numbers of jobs and homes becoming mismatched.
- Preparation and implementation of site specific transport plans can help make sure sustainable transport access to development is part of site design
- Implementation of other transport plans and strategies, such as the Regional Transport Plan, will help deliver more sustainable travel options
- SPG will provide additional evidence to support sustainable transport, such as by retaining shops.

Provide a range of types and tenures of housing that allows people to meet their housing needs

12.9 Providing homes is one of the main roles of the LDP. Many policies of the plan set out criteria for housing delivery in the County.

12.10 Potential positive impacts:

- Strategic policy S2 sets the overall housing growth for the County. This is based on evidence of what level of provision is required to meet needs.
- The strategic policy S4 on affordable housing will help make sure a proportion of new housing is provided to be affordable to lower income households. Policy H7 should also help provide new affordable housing in rural areas.
- The plan allocates specific sites for housing, this includes several large sites to accommodate large numbers of housing growth, S3.
- The policy on Gypsy and Traveller site provision should help in securing new pitch sites to meet the housing needs of these communities, H8.

12.11 Potential negative impacts:

- None

12.12 Recommendations:

- SPG on affordable housing may help secure delivery to meet identified needs. SPG could address issues such as the types and tenures of affordable housing required, design of housing, and how financial contributions will be managed.

To improve health and wellbeing by encouraging more healthy lifestyles, and protecting people from risk that may impact on their health and/or safety

12.13 This objective covers a variety of issues. Creating a healthy place includes encouraging healthy lifestyle choices, for example by supporting walking and providing open space. It also covers protecting people from harm, for example avoiding pollution and flood risk. Making sure everyone has access to a health centre by a choice of transport is also essential.

12.14 Potential positive impacts:

- Several policies relate to retaining and provision of new community facilities. These include outdoor recreation sites, leisure facilities and allotments, through policies CRF2 and CRF3.
- Relating to accessibility objectives improving non-car access can have health benefits. Most importantly those policies that encourage cycling ;M4. and Public Rights of Way M3. Policies S16 and M2 also encourage non-car access to all new development.
- Flood protection policies, SD3, and environmental protection, EP1, should help protect people from harm.
- Protecting green infrastructure can have benefits for wellbeing, especially where these allow access or views of greenspace in urban environments ie. policies GI1 NE1 and DES2.

12.15 Potential negative impacts:

- New industrial development has the potential to harm health and potential for impact will need to be investigated prior to any permissions being granted.

- There are also potential risks to health from policy and strategy. The large amount of new development is likely to give rise to new car trips. This could have adverse effects on air quality with associated health impacts and on wildlife. This may be exacerbated by new employment development in the M4 corridor.

12.16 Recommendations and mitigation:

- Design policies and policies on footpaths could include more detail on design. This could include design help improve safety and perceptions of safety on these routes. As well as designing routes to ensure direct links between places, they should also respect 'desire lines' of those travelling by foot. Helping more people walk for short trips is an essential component of encouraging healthy lifestyles. More people walking will also mean more people on the streets, helping deter crime and encourage interactions in the community.
- All new industrial development will require control measures on operation to avoid risk to health and wellbeing
- Environment Agency Wales advice needs to be followed to ensure new development is not put at unacceptable risk of flood.

To support and promote the distinctive character of local communities and community cohesion

12.17 The design of places has a great deal of impact on creating and supporting more cohesive communities. Designing places with a mix of uses so people can live, work and spend their leisure time in the local area is part of this. Also, development that encourages walking can help make places vibrant with greater opportunities for community interaction. Provision of community facilities is also essential. This objective strongly relates to accessibility.

12.18 Potential positive impacts:

- Several policies deal with protecting and enhancing community facilities CRF1 and CRF2.
- Some of the strategic sites promote mixed use developments
- Supporting rural economic development (RE2, 3 and 4) and provision of affordable housing (S4 and H7) in rural areas will help to support demographically diverse rural communities.

12.19 Potential negative impacts:

- Policies on strategic sites may not provide sufficient detail on how to deliver a mix of uses to meet communities needs, for example what type of facilities may be required.
- There is the risk that development in the Severnside area will lack good quality local services. Development of residential and employment development may be outward looking with new residents and employees travelling longer distances on the M4 to access jobs/homes.
- There is the risk that housing may come forward at a greater rate or in very different locations to employment development, due to the large quantity of

employment land allocated. In particular there may be a disparity in the Severnside area. This may create a mismatch of jobs and homes, increasing work commuting distances. A large proportion of residents commuting out of an area daily may have an adverse impact on building a cohesive community.

12.20 Recommendations and mitigation:

- Additional policies on design of new development may help deliver development that helps create communities. For example, ensuring that the policy on density is enforced in a way that promotes a vibrant built environment and that encourages walking and use of outside spaces that will help people meet and interact with the neighbours to facilitate community cohesion and identity.
- Using development briefs to guide the development of strategic sites may help create higher quality mixed use areas of a cohesive design. This can help make new local community hubs that are a focus for community life.
- Section 106 agreements will be necessary to benefits for the community from new development.

Protect, value, manage and enhance healthy functioning ecosystems, habitats and natural species diversity, valuing nature conservation interests wherever they are found

12.21 The LDP oversees the delivery of a large amount of growth in the County, land requirements may mean biodiversity impacts. The LDP has a role to play in protecting biodiversity from harm, both on designated sites and in the wider County.

12.22 Potential positive impacts:

- Policies of the LDP directly relate to protecting and enhancing biodiversity. These include the strategic policy on the natural environment S13 and development control policies NE1.
- Protection of green infrastructure in policy GI1 should also have benefits for biodiversity.
- Several policies on specific types of development contain criteria to ensure the protection of the natural environment. These include the policies on development in the open countryside, H4 and 6 on residential, and RE2 and 3 on rural enterprise and the general policy LC1. In addition policy T3 on Golf Courses contains requirements for ecological assessment.
- The environmental protection policy EP1 should help ensure pollution impacts do not harm biodiversity.
- The landscape protection policy LC5 includes criteria that should help protect landscape features of importance for biodiversity, including hedges, ponds and trees.

12.23 Potential negative impacts:

- A large amount of the development that will be delivered through the LDP will be on greenfield land. There will be inevitable impacts on nature conservation due to development of these sites.

- Specific allocations include some sites that are partly designated as important for local nature conservation.
- Increased car travel and use of water may put some biodiversity at risk from deterioration in the air and water quality as well as water quantity that habitats rely on.
- The plan area contains and is near many sites designated as of international importance for biodiversity. Development of new sites will need to demonstrate no significant harm to these sites alone or in combination.

12.24 Recommendations and mitigation:

- Where necessary individual ecological appraisals will need to be completed to demonstrate existing nature conservation assets and how development will protect and support wildlife. There is the potential for built development to increase the biodiversity of sites.
- Site specific appropriate assessment under the Habitats Directive will be necessary of some sites to demonstrate no significant harm to internationally designated nature conservation sites.
- New parks and open space is anticipated to be delivered over the plan period. The LDP should recognise the multifunctional potential of all open space. This should include protecting or incorporating features that enhance biodiversity and the landscape. A Green Infrastructure plan for the County should include biodiversity protection and enhancement.
- Policies relating to these requirements should be strictly enforced, avoiding the species poor landscaping that can often characterise landscape planting.
- Pollution impacts on water will need to be controlled through building practices, ensuring there is sufficient sewage treatment capacity to accommodate growth, and management of the water environment by Environment Agency Wales and utilities companies.

To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements

12.25 The majority of the County contains high quality landscapes. The LDP oversees the delivery of a large amount of growth in the County. Therefore, there is the need for new development to fit in to the landscape as well as is possible to minimise landscape impacts. The LDP has a role to play in protecting landscape from significant harm, with associated biodiversity and heritage benefits.

12.26 Potential positive impacts:

- Several of the LDP policies deal directly with protection of the landscape from harm. This includes the strategic policy S13 and development management policies LC5 on the protection of the wider landscape.
- Use of LANDMAP as promoted through policy should help protect features of the landscape that contribute to its quality.
- Protection and enhancement of designated landscape areas are covered through policies LC3 and LC4.

- Several policies on specific types of development contain criteria to ensure the protection of the landscape. These include the policies on development in the open countryside, H4 and 6 on residential, RE2 and 3 on rural enterprise and the general policy LC1. Policy T3 on golf courses also seeks to prevent adverse landscape impacts.
- The green infrastructure policy GI1 should help in landscape protection.
- Environmental protection policies EP1 and EP3 should help avoid some adverse landscape impacts, including through the control of lighting.
- Choice of site allocations has included landscape assessment, with sites in the most sensitive areas where mitigation is not possible not included for development.

12.27 Potential negative impacts:

- A large amount of the development that will be delivered through the LDP will be on greenfield land, with inevitable impacts on the landscape.
- Any of the proposed development on the periphery of towns and village areas will have to be of a high quality design to protect the landscape quality.

12.28 Recommendations and mitigation:

- Implementation of a Green Infrastructure strategy for the County will help identify areas of landscape in need of enhancing as part of multifunctional greenspace. New parks and also open space is anticipated to be delivered over the plan period.
- New development, especially in peripheral locations, will need to be designed to avoid significant adverse impacts on the landscape. Particular care will need to be taken to avoid creating unattractive 'urban fringe' development.

To maintain and enhance the built environment for both its visual character and distinctiveness and to create a better living environment.

12.29 The large amount of development proposed by the LDP has the potential to have an impact on the built environment character. There will be a need to make sure the design of individual buildings is visually of a high quality. In addition, to achieve a variety of sustainability benefits, such as encouraging walking, safety and reducing energy demand, the layout of development needs to be carefully considered.

12.30 Potential positive impacts:

- Policy DES1 sets the criteria for design of development, requiring these matters to be a consideration of all development.
- Policies on specific development types include criteria to secure good design, in particular the design of development in the open countryside requiring use of suitable building materials. The main policy setting controls is LC1 on new buildings in the countryside, and replacement dwellings; H5
- Policies on the protection of conservation areas should encourage good design HE1.

- A minerals policy, M1, allows small quarries for the extraction of local building stone, this has the potential to support the development of buildings in vernacular materials.

12.31 Potential adverse impacts:

- The large amount of development proposed in the County will need to be carefully planned to ensure that the built environment is enhanced wherever possible.
- The LDP contains little detail on the need for high quality design in new development.

12.32 Recommendations and mitigation:

- Design/Development Briefs or masterplans will help to ensure that development is designed in a cohesive way. A coordinated approach to urban layout will help make areas aesthetically more attractive and create a better living environment, to aid creation of sustainable places.
- The LDP could contain more detail on the design of new development.
- Design and Access Statements required by national policy will help make sure developers consider the quality of their design for development and its context.

Understand, value, protect and restore, where necessary, the historic cultural heritage of the area, including features of the built and semi-natural environment.

12.33 There are areas of high historic heritage value in the County, policies have been developed to help protect and enhance these assets wherever possible.

12.34 Potential positive impacts:

- The LDP contains specific policies on the protection of the historic environment. This includes policies on the protection and enhancement of listed buildings and conservation areas, HE1, HE2 and HE3, as well as the Blaenavon Industrial Landscape World Heritage Site, LC2.
- Policies on the re-use of rural buildings also address the need to protect the heritage value of these structures, H4 and H6.
- Landscape policies LC5 includes protection of features of the landscape that may have an historical heritage value.
- The site allocations policy for tourism includes Piercefield House, Chepstow for use as a hotel. If a new use for this building could be found it could help restore this heritage asset.

12.35 Potential negative impacts:

- Development of historic buildings will need to be of a high quality to ensure the value of these heritage features are not lost.
- Policies do not recognise the potential for buildings outside conservation areas to be of local significance and therefore should be protected from harm.

12.36 Recommendations and mitigation:

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- Up-to-date conservation management plans can be used to ensure new development in these areas help enhance the local character.
- Site allocations containing historic heritage features, including the potential for buried archaeology and for historic landscape features, may require site assessment and measures implemented to mitigate impacts.
- The LDP may need to ensure buildings of local importance and future heritage are protected from harm where possible.

To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere to protect from climate change

12.37 The majority of additional air pollution in the County is likely to come from transport, although new industrial development also has the potential to reduce air quality. Air quality deterioration can have wide-ranging impacts on health and the natural environment. Air quality impacts of policies relate closely to impacts against the accessibility criteria.

12.38 Potential positive impacts:

- Improvements to non-car access to jobs and services will help reduce the overall impact of new development. These issues are covered in paragraphs 12.15 – 12.18 and include spatial strategy and movement policies.
- Policy EP1 seeks to ensure new development does not have air pollution impacts.
- Planning applications for the development of strategic sites require feasibility assessments on potential for renewable and low carbon energy generation, policy S2. This could have benefits from reducing the air quality impacts of fossil fuel generated energy.

12.39 Potential negative impacts:

- The quantity of development to be delivered in the County, policies S2 and S9, will create additional traffic with likely impacts on air quality.
- Some of the transport proposals relate to large road projects, this will encourage road travel. Schemes include improvements to the M4 although this is a WAG project and largely beyond the control of the County Council.

12.40 Recommendations and mitigation:

- Helping people choose more sustainable alternatives to car travel will help reduce the air quality impacts created by new development. Helping implement the Regional Transport Plan and mixed use development will therefore be of benefit to the area. Promotion of mixed use development through the spatial strategy may also help avoid large increases in car travel.
- Controls on some industrial development types will help protect local air quality.
- Helping developers deliver more energy efficient and renewable energy technologies.

To maintain and improve the quality of ground, surface and coastal waters

To maintain the quantity of water available including potable water supplies, and ground water and river levels.

12.41 Protecting the quality of water is essential for the protection of wetland and river biodiversity. It is also important in providing a potable water supply. The quality of water can be directly effected through pollution as well as a result of low flows in rivers due to over-abstraction or drought. Policies of the LDP are quite brief on specific controls, but water efficiency and flood control measures can also have an impact.

12.42 Potential positive impacts:

- Reducing water demand in new development is essential. Policies on sustainable construction and EP2 on water source protection should help protect supply.
- Policy SD4 on sustainable drainage may help protect water quality.
- Policy EP1 on the need to protect the natural environment including water quality. EP6 requires that new development be connected to the foul sewer where possible and this will help protect ground and surface water quality.

12.43 Potential negative impacts:

- The level of development proposed through the LDP has a potential impact on the availability of water in the County, policies S2 and S9.
- Sufficient sewage treatment and waste water infrastructure must be in place to deal with the additional demands of new development.
- New waste treatment sites and industrial development could have adverse impacts on ground and surface waters. Suitable controls and licensing will be necessary to ensure impacts are avoided.
- Mobilisation of contaminants for previously developed sites can adversely impact on surface and groundwater quality.

12.44 Recommendations and mitigation:

- Making sure that increased capacity for water and sewerage infrastructure is phased with development, to ensure it is in place prior to occupation of development sites. This include delivery of the water utility company asset management plans.
- Development sites will need to be managed to ensure that during construction there is no contamination to service waters from site run-off.
- Implementation of water utilities companies strategic plans.
- Environment Agency Wales advice needs to be followed on protecting watercourses, floodplains, water abstraction and flood risk.
- New development should help to ensure the more efficient use of water.

Ensure that new development is designed and located to avoid the risk of flooding, and ensure the risk of flooding is not increased elsewhere.

- 12.45 Parts of the County are at risk of flood. Due to the constraints on land availability in some towns and villages there may be a need to develop in or adjacent to areas of higher flood risk. The LDP will need to ensure that development does not put people at undue risk of foreseeable flood.
- 12.46 Potential positive impacts:
- The plan helps highlight national policy on avoiding putting vulnerable development in areas at higher risk of flood. This includes policy SD3 on flood.
 - Policy SD4 requires new development to incorporate sustainable drainage wherever possible, this will help reduce the risk of flood on and off development sites.
 - The sites selection process for allocations incorporates the need to avoid putting development in higher flood risk areas.
- 12.47 Potential negative impacts:
- Some allocations will have parts at risk of flood, development and different uses on these sites will need to be distributed to avoid flood risk.
- 12.48 Recommendations and mitigation:
- Where it is necessary infrastructure to reduce flood risk must be in place before new development is occupied.
 - Vulnerable uses must be kept out of higher risk areas.
 - Environment Agency Wales advice should be followed for proposed development in flood risk areas.

To ensure that primary materials and minerals are managed in a sustainable way, by safeguarding mineral areas, encouraging re-use and recycling and avoiding final disposal of resources

- 12.49 The LDP covers two main issues that have relevance to this objective, these relate to the sustainable management of waste and the protection of mineral assets. The LDP can only have a limited impact on these issues, that are largely managed through other strategies and commercial interests.
- 12.50 Potential positive impacts:
- Policy W1 directly relates to reducing waste in construction and demolition.
 - W2 addresses the need for waste collection and storage facilities related to new household development. The policy could be more prescriptive in its requirements, however, it is likely to have a positive impact against this objective.
 - W3 sets out the principles for delivering new sustainable waste management facilities to meet the demand in the region.
 - Minerals safeguarding policies will help protect against mineral assets becoming sterilised by inappropriately located development.
- 12.51 Potential negative impacts:

- No sites specifically for waste management are allocated, this may slow the delivery of needed sites for more sustainable waste management.
- New development will inevitably create additional waste in the County, strategies will need to be in place to reduce the proportion (and total) sent to landfill for final disposal.
- Policies need to encourage the delivery of more new facilities for waste reuse and recycling, including composting.
- Development will inevitably require the use of new primary materials, policies on sustainable construction are essential to secure greater use of secondary resource and reducing in wastage as part of construction.

12.52 Recommendations and mitigation:

- Policies or supporting text could raise the need for a Site Waste Management Plan for all new larger scale construction projects.

To use land efficiently by prioritising development on previously developed land where possible, and using existing land efficiently by tackling contamination and protecting higher grade agricultural soil.

12.53 Sites need to be found to accommodate the anticipated level of growth in the plan area. There is only a limited supply of previously developed land in much of the County, therefore greenfield land will be required. Ensuring the best and most efficient use is made of available land will help reduce the overall land requirement.

12.54 Potential positive impacts:

- DES1 sets a minimum density for new development, this will help make sure land for housing is used efficiently.
- Policies on protecting the landscape and high quality biodiversity assets will help protect the best land.
- Policy EP1 protects existing employment sites from change of use, this is positive in helping retain land in its best use.
- EP1 on environmental protection seeks to make sure contaminated land is suitably remediated prior to development, allowing previous industrial sites to be bought back into use.

12.55 Potential negative impacts:

- The majority of new development is allocated on greenfield sites. Some of these sites have soils of higher agricultural quality that will be lost to development.
- E2 permits new employment development on greenfield sites outside the development boundaries, this could put agricultural soils at further risk.

12.56 Recommendations and mitigation:

- Ensuring that minimum densities are implemented and higher densities sought wherever possible.

- Include considerations on the quality of agricultural land in making decisions on planning applications.

To secure energy efficiency improvements in all new buildings and encourage energy generation from renewable sources

12.57 New development will increase the demand for energy in the County. Finding ways to reduce the overall demand for energy is essential through greater energy efficiency in development. More energy also needs to be sourced from renewable and low carbon sources, both on-site and for the national grid. This will help to reduce contribution to climate change and reduce reliance on fossil fuels. The need to reduce energy demand and seek low carbon solutions is part of national planning policy and building regulations.

12.58 Potential positive impacts:

- Policy S3 requires that all new strategic sites complete an energy feasibility study on the potential of the site for renewable and low carbon energy generation, including as part of district heating/power networks.
- SD1 covers the development of renewable energy technology in the County.
- Policies on improving non-car access to development will help in reducing reliance on private car transport.

12.59 Potential negative impacts:

- New development will create inevitable increase in demand.
- There is no requirement for feasibility studies on smaller sites, although national standards will have to be met.

12.60 Recommendations and mitigation:

- Additional guidance on development on low carbon and renewable energy schemes
- A clear evidence and knowledge base on the costs and potential for delivering energy efficiency, low carbon and renewable energy. This will help planners and developers recognise the potential of sites and prepare/evaluate energy feasibility assessments.
- The LDP needs to encourage renewable energy development in the County to meet national demands. Therefore, policies on controlling this type of development need to be implemented in a reasonable way.

Provide a range of jobs within Monmouthshire that help meet the needs of the resident workforce

12.61 One of the principle purposes of the plan is to help provide new economic growth in the County and support new jobs to match the skills of the resident workforce.

12.62 Potential positive impacts:

- Policies of the plan allocate land for new economic growth, addressed in strategic policy S9.

- Existing employment sites are protected from change of use through policy E1, helping to protect existing access to jobs.
- E3 supports working from home.
- S2, H1,H2 and H3 should help deliver housing to meet the needs of a resident workforce. Affordable housing policy will help those on lower incomes live near their place of employment, rather than commuting in from less expensive local authority areas.
- Tourism policies (S11) and those on rural enterprise (S10) will help support a range of job types in the County.

12.63 Potential negative impacts:

- Housing growth allocations are not always matched by similar allocations on economic growth, for example in the 'Severnside' area. This may reduce available of jobs in some parts of the County.
- There is a current mismatch in the availability of employment and housing in the Severnside part of the County. New employment must be developed in this location to avoid expanding the commuter village character of the area.

12.64 Recommendations and mitigation:

- Phasing of housing and employment land release may be necessary to ensure a good match in the location of new jobs and the location of new homes.

Raise prosperity and quality of life by developing a more self-sustaining local economy encouraging indigenous growth

12.65 This objective not only relates to economic development but also creating an attractive place for business where people choose to invest.

12.66 Potential positive impacts:

- Site allocations (S9) and protection of existing employment sites will help make the County an attractive place for business.
- Provision of new transport infrastructure can help encourage businesses to the County.
- A high quality natural environment, as addressed through strategic (S13) and development management policies (chapter 6), is an important part of making the County attractive to inward investors.
- Policy E2 is quite permissive of new employment development outside any main settlement, supporting business growth.
- Policies on rural enterprise will help support a more diverse and viable rural economy. This includes policies RE1 and RE2 on rural business and agricultural diversification.
- Tourism is an important part of the Monmouthshire economy and policies T1, T2 and T3 support this.

12.67 Potential negative impacts:

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- Several of the employment allocations have been empty for a long-time and may be less attractive to investors.

12.68 Recommendations and mitigation:

- The policies of the plan will need to be supported by an economic strategy for the County to help secure inward investment.
- Good public transport and road links will be an important part of encouraging investments in the County.
- Tourism strategies can help make the most of tourism potential in the County, including specialisation in the tourism economy, for instance creating a mountain bike hub.
- Policy EP4 must be applied in a way that is not overly restrictive of telecommunications development. This type of infrastructure is essential for modern business and therefore a high quality network throughout the County, including rural areas, is essential.

Ensure development responds to the impacts and causes of climate change by integrating mitigation and adaptation approaches in new development

12.69 This is a cross-cutting objective, as shown in the sustainability framework it has links to sustainability objectives on: accessibility, health, biodiversity, landscape, built environment, historic heritage, air, water, flood, minerals and waste and energy.

12.70 There are a range of positive impacts of the LDP on achieving the objective including policies to help mitigate impacts (covered by objectives on energy, accessibility and waste). There are also policies that will help development in the County to adapt to a changing climate, such as those on flood protection and protection of habitat linking features in the landscape.

12.71 Other matters related to climate change are related to national planning policy such as sustainable construction or regional plans such as implementation of the regional waste and transport plans.

13 Mitigation

- 13.1 The SEA Directive requires that consideration be given to how any significant impacts identified during the SA process could be mitigated.
- 13.2 Mitigation of the potential adverse impacts of the strategy can be achieved in a number of ways. Each policy in the policy appraisal (Appendix 4, 5 and 6) gives examples of how the potential adverse impacts of the policy could be mitigated against, as does the appraisal in section 10.
- 13.3 There are several ways mitigation of possible impacts can take place, these are shown in paragraphs 13.4 to 13.10.
- 13.4 **Implementing other planning policies** - many potential impacts will be mitigated through the use of other policies including those of the LDP and national policy. This has a particular role to play in avoiding the adverse impacts from the quantity of development to be delivered through the strategy. Policies that will help mitigate impacts include those on natural environment protection, community infrastructure provision, design and flood control.
- 13.5 **Adjusting wording** to fine tune LDP policy can help to implement successfully more sustainable development. This could include, clarifying or making wording less ambiguous or more positive for some policies to help deliver the desired policy output.
- 13.6 **Requirements for developers** to show how they have addressed environmental and sustainability concerns through their development. This could include green travel plans, meeting sustainable construction criteria, infrastructure delivery, biodiversity enhancement and design and access statements. There may also be site-by-site planning application requirements including further ecological assessment, flood risk assessment and travel planning.
- 13.7 The **phased release** of housing and employment sites could help delivery of allocations to help secure sustainable development. There is also the need to ensure that social and physical infrastructure is phased into development, to make sure it is in place prior to occupation. This will help ensure that delivery of different land-uses are matched and facilities are in place as part of helping to make more sustainable communities and to help reduce reliance on car travel.
- 13.8 Up-to-date **Development Briefs** or **Masterplans** for all of the larger development sites, or groups of small sites in the same area. These will help implement a cohesive development strategy for whole areas. This has greater potential to deliver high quality and sustainable development rather than a piecemeal approach. It should cover issues such as:
- design protocols and the layout of development
 - biodiversity protection or enhancement measures
 - the sustainable construction standards that should be met

- the proportion of energy used on site that should be generated by, on or near site renewables and low carbon targets
 - public transport, walking or cycling links between individual site elements.
- 13.9 The delivery of infrastructure improvements to mitigate some impacts, such as loss of public open space and public transport enhancement, will also be dependent on developer **contributions or obligations**. These will be used to deliver sustainability benefits associated with new development.
- 13.10 Implementation of **other strategies and plans** in the plan area, which will include measures such as the regional transport plan, waste plan, tourism plans and the LDP of neighbouring local authorities.

14 Monitoring

- 14.1 There is a requirement for monitoring of the sustainability appraisal. This provides a check of LDP implementation on sustainability development. This will need to consider positive and negative impacts, triggering a review if necessary.
- 14.2 The specific requirements of the SEA Regulations on monitoring are to:
- 14.3 *“Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage”* (Regulation 17(1))
- 14.4 The sustainability framework is a good starting point for developing targets and indicators for monitoring. However, monitoring for the SA can be part of the wider monitoring process for the LDP, using a subset of the overall monitoring objectives. The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore it may be possible to combine with the annual monitoring proposals for the LDP.
- 14.5 Monitoring need only begin once the LDP has been adopted and implementation begun. Therefore, a monitoring framework for the SA need not be agreed until the final monitoring framework for the LDP is in place.
- 14.6 Many of the proposed indicators for the LDP set out in the proposed publication version of the LDP could be used to monitor sustainability issues. Appendix 7 shows the relationship of LDP monitoring indicators as they appear in section 8 of the LDP and sustainability objectives. This is intended as indication of how the monitoring and SA process are interlinked.
- 14.7 For a successful LDP monitoring framework the Council must ensure that the indicators they choose for monitoring are manageable, really measure the effects of LDP implementation, and are matters over which the LDP can have a direct influence. The indicators should also only address matters that are required through policy and not set indicators that exceed policy expectations.
- 14.8 In setting a monitoring framework for the LDP the chosen indicators and targets need to be:
- **specific** – in that it relates to policy objectives, indicators used for the LDP reflect what is set out in policy and strategy, and do not appear to be defining requirements that go beyond, or differ from, policy
 - **attributable** – monitoring the indicator must give results that can be directly related to the LDP policies, and should not be issues that are influenced or are more likely to be influenced by matters outside the control of the LDP
 - **measurable** – it must be the case that data or information can realistically be gathered on the indicators, including whether this is possible given time and resources. Indicators could be linked to data already been gathered by other bodies, besides the planning authority.

- **timescale** – the indicator must be capable of being monitored on a regular basis, usually annually, to be an effective part of a monitoring programme.

15 Conclusions and recommendation

15.1 The sustainability appraisal, of the Deposit version of the Monmouthshire Local Development Plan (LDP) shows that there are many aspects of the strategy and policies that are likely to contribute to sustainable development. There is also a clear intention of the LDP to deliver sustainable development, as demonstrated in the LDP vision and strategic objectives.

A sustainable spatial strategy

15.2 Creating a sustainable strategy is an essential part of creating a sustainable LDP. 'Frontloading' of the plan to have a sustainable spatial strategy should mean that the rest of the plan could simply follow this to deliver sustainability development in the plan area. Then by using development management policies to fine-tune the strategy and get the most out of development, avoiding adverse sustainability impacts and securing benefits.

15.3 One of the principle roles of a spatial strategy is to deliver more sustainable development by reducing reliance on car travel. This can be done through supporting public transport improvements including; walking, and cycling routes. However, more important than this is a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place.

15.4 The spatial strategy has an essential role in distributing development and therefore is key to shaping the future of the towns and villages. It needs to look for ways to provide a mix of different land uses, such as homes, jobs and services, which people can access without getting in their car. The strategy needs to link where people live to where they work. Everyday commuting creates a large number of unsustainable car trips and often puts those who cannot travel by car at a disadvantage.

15.5 Reducing travel can have some major sustainability benefits. These include:

- reducing emissions to air, with benefits for local air quality whilst helping mitigate against climate change
- lowering Monmouthshire's contribution to climate change
- reducing congestion which can be beneficial for the economy
- bringing health benefits from reduced air pollution and reducing adverse impacts on wellbeing of congested roads
- social benefits as more people have equitable access to jobs and services where the priority is not on people who can or choose to travel by car.

15.6 In principle, the strategy is compatible with this approach to creating a sustainable spatial strategy. It focuses the majority of development in the Main Towns, the 'Sevenside' area and some of the larger rural villages. This should help promote more sustainable patterns of development, which reduce the need to travel.

- 15.7 In addition, permitting a proportion of development in rural areas can help support vibrant and viable rural communities through the provision of new affordable homes for local people and new rural enterprises. The site assessment does reveal that some of the allocations in more rural locations may have poor non-car access to a range of jobs and services. The quantity of development is not likely to result in significant impacts relating to deteriorating air quality or climate change. However, it does run contrary to accessibility objectives and may result in pockets of isolation in rural areas for people who cannot access services by car, for whatever reason. Increasing fuel prices mean that those on lower incomes may be particularly susceptible to isolation.
- 15.8 The spatial distribution of development is supported by a policy that requires all sites to deliver a proportion of affordable houses to meet identified needs. This could have benefits in helping reverse the decline of rural communities whilst also helping to retain a resident workforce to fill all types of job role.
- 15.9 The LDP background papers set out how the level of growth in the LDP was determined and how the distribution of development was decided on. There remains some mismatch in the quantity of land allocated for housing and employment, as well as some mismatch in the distribution. Due to land constraints and existing committed development there is a large amount of employment land allocated in the south of the County, in the 'Sevenside' area. Housing development is more distributed throughout the County, with the majority of new allocations adjacent to the Main Towns of Abergavenny, Monmouth and Chepstow. This mismatch is likely to mean that the 'Sevenside' employment does encourage more car travel as it is in a strategic location on the M4 and is therefore likely to attract commuting trips for a wider area. However, in other locations the match of housing to employment may encourage greater levels of self-containment.
- 15.10 Also, in the 'Sevenside' area there is a need to deliver a greater mix of services in some of the villages. Currently, some of the residential areas have little community character and are predominantly 'dormitory' neighbourhoods where people travel elsewhere to meet work, leisure and retail needs. Providing better links to jobs, shops and community services in these areas that people can get to on foot is an essential starting point in creating cohesive communities.

A useable plan

- 15.11 Part of securing sustainable delivery of development, as set out in the strategy and policies, will be making sure the LDP can be easily understood and implemented. For this reason, the SA makes some general suggestions on changes to the LDP to benefit the clarity and usability of the document. The SA suggests that a shorter plan with fewer policies may be easier to implement.
- 15.12 Characteristics of a concise plan would be fewer strategic policies. These policies should simply set the overall quantity and distribution of development as the basic framework for development. Strategic policies would be supported by a set of policies that are written from a point of view of what is sought from development, rather than the current policy structure that seeks a policy on every type of development that could be foreseen.

Coverage of sustainability issues

- 15.13 A review of the LDP policies against the sustainability objectives for the SA revealed that the plan is likely to have a positive relationship with many of the objectives. However, there are some issues where the delivery of development will need to be managed to reduce the overall impact. These issues are shown in paragraphs 1.14 to 1.22.
- 15.14 **Affordable homes:** Providing additional information on the proportion and type of affordable homes, and how financial contributions will be determined, will help ensure these homes are provided to meet needs.
- 15.15 **Accessibility and reducing car use:** All new development must be designed to promote walking access. To encourage people away from using their cars walking routes need to be of a high quality, safe and direct. The ground floor and entrance areas of development need to be welcoming to those arriving by foot. Cycling and public transport accesses are also essential.
- 15.16 **Urban design:** The careful design of the layout of new development can make great contributions to sustainable development. All larger development sites need to provide evidence that they have been carefully planned to maximise benefits, including safe and direct walking routes, design for energy efficiency, integration of landscaping/nature conservation features and appropriate density to create a vibrant place.
- 15.17 **Communities and health:** The design of development can help create places that create community cohesion and sustainable lifestyle choices. This will be through increased walking, provision of open and community space, location of primary schools and access to the countryside.
- 15.18 **Protection of biodiversity:** The Habitats Regulations Assessment screening identified that the LDP is unlikely to have any significant impact on internationally designated nature conservation sites. However, this does not rule out the need for individual sites to undergo appropriate assessment for impact alone or in combination, where necessary. Where sites or buildings for development are likely to be of importance to local biodiversity assessment, mitigation of impacts will be necessary.
- 15.19 **Landscape impacts:** Landscapes throughout the County are of very high quality. The majority of new development will take place on greenfield sites. Therefore, the design of new development needs to incorporate landscaping to screen any impact and to avoid significant effects. Development also needs to be located on sites to make maximum use of landform and existing features to screen development. New buildings need to be of a high quality to enhance the urban edge of settlements and views of the town/village from the countryside.
- 15.20 **Impact on natural resources:** The quantity of development will have an inevitable impact on use of natural resources. To avoid significant adverse impacts precautions need to be taken in new development. Impacts can be avoided through measures including:

- ensuring there is available water to serve new development
- ensuring sufficient capacity for waste water treatment is in place prior to development proceeding
- greater energy efficiency and use of lower carbon energy sources
- development at densities to make the best use of land
- minimising waste in construction and ensuring new development incorporates space for storage and collection of recyclables
- making use of recycled material in construction.

15.21 **Energy use:** The plan requires that feasibility studies are undertaken by developers of strategic sites to demonstrate the capacity of the site for low carbon and/or renewable energy generation. Planners will need to make sure that they have sufficient evidence to evaluate these studies and secure more sustainable energy use on all sites. Plans for larger scale renewable energy generation should also be considered in context of the contribution Monmouthshire must make to meeting national carbon reductions.

15.22 **Employment:** New employment development could be phased with housing delivery to ensure there is not a mismatch of jobs and homes creating unsustainable patterns of growth. New employment types need to be supported that provide jobs to match the existing skills of the workforce.

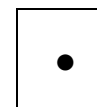
Appendix 1

Overview appraisal of the proposed LDP objectives against the sustainability objectives developed for the sustainability appraisal

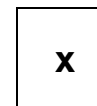
This Appendix considers the sustainability implications of the proposed LDP objectives, in order to ensure the matters covered are consistent with the objectives for more sustainable development. The matrix based approach provides a useful visual overview of the compatibility of the two sets of objectives, allowing for the identification of potential areas of conflict and omissions in the LDP objectives.

Key to appraisal symbols

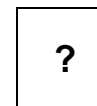
Likely to contribute to the achievement of greater sustainability according to the identified objective



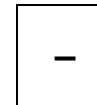
Likely to hinder the achievement of greater sustainability according to the identified objective



Likely effect but too unpredictable to specify, or multiple impacts which are potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



SA Objective / LDP Objective	Accessibility	Housing	Health	Community	Biodiversity	Landscape	Built environment	Historic heritage	Air	Water quality	Water supply	Flood	Minerals and waste	Land/soil	Energy	Employment	Wealth creation	Climate	
1. Sustainable communities	●	●	●	●	-	-	-	-	?	-	-	-	-	-	-	?	?	?	This objective is positive in terms of aiming for more sustainable areas, where people can meet their everyday needs locally to where they live.
2. Maintain main centres	●	?	?	●	-	-	?	?	●	-	-	-	-	-	-	?	?	-	This objective supports the continued viability of main centres, essential for accessible services to support a wider hinterland.
3. Rural communities	●	●	?	●	?	?	?	?	?	-	-	-	-	-	-	?	?	?	Supporting rural centres can help maintain viable communities in these locations. Delivery of affordable homes in these centres, particularly in less affordable parts of the County will be essential to this. Making sure delivery is compatible to the location should also help avoid adverse impacts, such as on the natural environment and avoiding exacerbating unsustainable travel.
4. Housing	●	●	●	●	●	?	?	?	-	-	?	-	X	X	X	?	●	?	This objective is related to housing delivery. The objective is positive for social impacts of sustainable development, as provision of good quality homes is essential for wellbeing. Homes will also support the workforce which is essential for the local economy. However, new homes will require land therefore sites have to be found the make best

SA Objective LDP Objective	Accessibility	Housing	Health	Community	Biodiversity	Landscape	Built environment	Historic heritage	Air	Water quality	Water supply	Flood	Minerals and waste	Land/soil	Energy	Employment	Wealth creation	Climate	
																			use of these resources, without unacceptable harm to the natural environment. New homes will also require the use of additional resources, including energy, water and materials.
5. Healthier lifestyles	●	-	●	?	?	?	?	-	-	-	-	-	-	-	-	-	-	-	Access to recreational facilities is essential for encouraging more healthy lifestyles, this includes formal recreation areas as well as the open countryside.
6. Infrastructure	●	-	●	●	-	-	-	-	?	●	●	?	-	-	?	-	-	?	Phasing the delivery of infrastructure (utilities and community services) into development is essential in creating more sustainable places. This can help reduce environmental impacts, such as on water quality and reducing the need to travel. There are also social benefits related to supporting accessible local community services.
7. Economy	?	-	-	?	?	?	?	-	?	-	?	-	X	X	X	●	●	?	Supporting the local economy is essential to the sustainable development of Monmouthshire. New jobs need to be provided to meet the skills availability of Monmouthshire residents. This should help sustainable economic growth and depending on the type and location of growth should help reduce unsustainable travel patterns. New businesses will

SA Objective LDP Objective	Accessibility	Housing	Health	Community	Biodiversity	Landscape	Built environment	Historic heritage	Air	Water quality	Water supply	Flood	Minerals and waste	Land/soil	Energy	Employment	Wealth creation	Climate	
																			also require the use of additional resources, including energy, water and materials.
8. Natural heritage	-	-	●	-	●	●	-	-	-	-	-	-	-	-	-	-	?	●	Protection of the high quality natural environment is essential in delivering sustainable development that considers the long-term impacts of development. This will include retaining connectivity of habitats as one of the ways to protect biodiversity.
9. Natural resources	-	-	-	-	-	-	-	-	-	?	●	-	●	-	●	-	-	●	Reducing use of natural resources in new development is essential to help reduce the overall impact of delivering the proposed level of growth. The way that the objective is written, in terms of helping people choose more sustainable lifestyles, means it covers many aspects of sustainable development, from construction to reducing car use. It could be that this repeats other objectives, although the sentiment is supported by the appraisal. The objective could address water use.
10. Land use	-	-	-	-	?	?	-	-	-	-	-	-	●	●	-	-	-	●	This objective simply states that land will be used efficiently. The objective is a positive one in terms of delivering sustainable development.

SA Objective LDP Objective	Accessibility	Housing	Health	Community	Biodiversity	Landscape	Built environment	Historic heritage	Air	Water quality	Water supply	Flood	Minerals and waste	Land/soil	Energy	Employment	Wealth creation	Climate	
11. Carbon reduction	-	-	?	-	?	-	-	-	?	?	?	-	?	-	●	-	-	●	This objective addresses the need for new development to be able to adapt to a changing climate, with benefits for people and the natural environment. The objective also relates to carbon reduction a positive objective in helping reduce the County's contribution to climate change.
12. Flood risk	-	?	●	-	-	-	-	-	-	●	-	●	-	-	-	-	-	●	Avoiding locating vulnerable development at locations at risk of flood is essential for delivering safe and sustainable development. This includes avoiding locating and designing development that would increase the risk of flooding off-site.
13. Waste and minerals	-	-	-	-	?	?	-	-	-	-	-	-	●	-	-	?	?	-	An objective to manage waste more sustainably is an essential component of long-term sustainable development. The LDP will need to play its role in reducing the quantity of waste that is sent to final disposal by providing locations of alternative treatment options. The need to protect mineral resource will also help avoid these being wasted by unsuitably located development.
14. Sustainable transport	●	-	?	?	-	-	-	-	●	-	-	-	-	-	-	-	-	●	Delivering more sustainable transport can have benefits for sustainable development. This includes reducing car travel and the negative consequences this

SA Objective \ LDP Objective	Accessibility	Housing	Health	Community	Biodiversity	Landscape	Built environment	Historic heritage	Air	Water quality	Water supply	Flood	Minerals and waste	Land/soil	Energy	Employment	Wealth creation	Climate	
																			can have on people and the environment. Better walking and cycling routes could also have benefits for health.
15. Built environment	-	-	-	?	-	-	●	●	-	-	-	-	-	-	-	-	?	-	A high quality built environment can have a variety of benefits, including providing a 'sense of place' to communities and protecting a finite asset for Monmouthshire, which can help make the area attractive to investors.
16. Sustainable design	●	?	?	?	?	-	●	?	●	-	?	-	?	-	●	-	-	●	This objective covers a range of issues, all of which are compatible with delivering more sustainable development. However, making the objective more specific to matters that are not covered elsewhere may improve the clarity of this objective in delivering high quality new buildings and urban layouts.

Appendix 2

Sustainability Appraisal of the Monmouthshire Strategic Options

MONMOUTHSHIRE
COUNTY COUNCIL

**Monmouthshire
Local Development Plan
Options Report**

Sustainability appraisal

February 2009



Contents

- 1 Sustainability appraisal of options
- 2 Choice of sustainability objectives
- 3 Sustainability appraisal of growth options
- 4 Sustainability appraisal of spatial options
- 5 Other sustainability implications of the LDP

1 Sustainability appraisal of options

- 1.1 This note sets out the main sustainability implications for implementing the three options for housing growth and the four options for spatial strategy, as set out in the Monmouthshire Local Development Plan: Option Report (December 2008).
- 1.2 The sustainability appraisal (SA) uses objectives drawn from the sustainability framework developed for the process as the basis of assessment. The SA considers how each option may perform against each of the selected objectives.
- 1.3 At this stage it is not possible to see exactly how each option would be implemented, such as the location of growth or the development management policies that will be in place. Therefore, the SA has to make broad predictions of sustainability impacts, based on a set of assumptions. These are defined for the appraisal of each option.
- 1.4 Because only very broad predictions can be made on sustainability impacts of the option, no 'symbol summary' of impacts has been identified. The reasons for this is the majority of options there would be positive and negative implications, depending on exact choices on level and geographical distribution of growth, and a simple symbol summary does not recognise the complexity of these potentially conflicting issues.
- 1.5 This appraisal of options was informed by a workshop event held in Abergavenny on 14 January 2009. The purpose of this event was to allow invited stakeholders to have an input into what they believe would be the sustainability implications of delivering the different growth and spatial options.

2 Choice of sustainability objectives

- 2.1 This assessment can only make quite broad assumptions about the sustainability implications of delivering growth. A sub-set of sustainability objectives drawn from the sustainability framework have been used as the basis of assessment at this stage. This is based on selecting these issues where it is possible to identify strategic impacts. The selection also includes all those that were identified by stakeholders in the Abergavenny workshop as essential in making choices between spatial options.
- 2.2 In some instances, objectives have been combined as the cause or mechanism of impact would be the same. Therefore, it makes sense to assess them together, although drawing out specific issues where relevant.
- 2.3 The full sustainability framework is shown in full in appendix 1. The selected objectives for this stage of the SA are:
 - accessibility

- housing
- community
- biodiversity, landscape and land/soil
- built environment and historic heritage
- air
- water quality and supply
- flood
- energy
- economy

Climate change

- 2.4 Addressing climate change through appropriate mitigation and adaptation is also an important role for the LDP. No specific objective has been selected on 'climate change', as this is such a cross-cutting issue it can not be summed up in one objective. Instead the elements of climate change mitigation and adaptation have been integrated into other objectives. In this case these are air, energy, and flood, although there may also be implications for landscape, biodiversity, built heritage and water. The cross-cutting implications of climate change can be seen in the sustainability framework, appendix 1.

3 Sustainability appraisal of growth options

Introduction

- 3.1 Housing growth levels have important implications for delivering more sustainable development.
- 3.2 There will be an inevitable increasing demand for housing even if no new people were to move into Monmouthshire. As household size shrinks, for reasons including more people living alone, and people living longer, new homes are needed to maintain the population in the area. Higher levels of growth can also accommodate population growth, through natural increase in people moving in to the area.
- 3.3 Therefore, decisions have to be made on whether to restrict development of new homes, with possible adverse impacts on affordability and knock-on impacts for community character. This may also lead to patterns of development that give rise to unsustainable travel patterns.
- 3.4 Alternatively seeking higher levels of growth, with greater greenfield land-take, but the opportunity to provide affordable homes to meet local needs and help establish new patterns of development that encourage more sustainable travel. Higher levels of growth also mean a greater amount of

developer contributions that can deliver other benefits, such as town centre renewal and regeneration and the provision of new community facilities.

- 3.5 The chosen growth option also needs to be realistic, based on what the market can reasonably deliver. Identifying realistic growth levels will help make sure development is planned in such a way that it delivers sustainable development for the County. For instance, the LDP can select allocated sites for the housing growth in sustainable locations, to contribute to protecting of high quality environmental assets, delivering regeneration benefits to towns and villages, and can be complemented by suitable land allocations for employment.
- 3.6 Whatever option is chosen it will be necessary to ensure policies are in place to avoid adverse impacts on delivery. For example, more sustainable construction, the need to respect local biodiversity assets, affordable housing targets and ensuring good design.

Options for housing growth

- 3.7 In order to undertake the sustainability appraisal of growth options it is necessary to set out the basis on which these assessments are made. To allow assessment at this stage it needs to take make certain assumptions about development delivery.
- 3.8 It is also necessary to establish the level of growth that is already accounted for through:
- existing completions
 - development that is underway
 - existing planning permissions that have yet to be implemented, and
 - allocations where planning permission is actively being pursued.
- 3.9 The purpose is to find what level of development is permitted to occur anyway, without the LDP, and the residual amount that land needs to be found for.
- 3.10 **Assumptions:**
- new housing will make financial s106 contributions, with for benefits including the delivery of community infrastructure, environmental enhancement, transport infrastructure
 - housing development will be required to contribute to provision of affordable homes
 - more development would mean a greater use of natural resources, it is assumed that if development is not delivered in Monmouthshire it will not be delivered somewhere else instead (clearly in practice this may not be the case)

- new housing will be built to higher efficiency standards for water and energy use than current development, it will also incorporate measures to help reduce waste
- the aim would be for new housing provision to be matched by job growth.
- existing allocations that do not show any sign of being delivered, or planning permissions that have lapsed will be reviewed as part of setting LDP proposals, re-allocating or de-allocating sites that have little chance of delivery
- All three options will be delivered at the growth levels specified

3.11 **Current commitments and the proposed pattern of development delivered by the UDP:**

- around 425 homes have been completed 2006-2008 contributing towards the regional apportionment figure developed by the South East Wales regional group
- existing development patterns focus development in Abergavenny and Llanfoist (over 500 dwellings– or a quarter of total completions or commitments)
- other high growth locations are Caldicot (over 220) and Chepstow (over 230)
- most of the growth in Caldicot has yet to start (over 200 remaining) and over 120 in Chepstow however most of the growth in Llanfoist has yet to start (over 210 dwelling remaining)
- Chepstow, Monmouth and Abergavenny also have large outstanding commitments (121 to 151 homes in each). In addition, there are outstanding commitments in Magor/Undy, Usk and Raglan, although these are all fewer than 100 homes in each
- There are allocations that have yet to be progressed in smaller villages including Caerwent (70 homes)
- Rural development, through infill and conversion, have made up around 25% of all development coming forward in the plan area, and 26% of outstanding allocations and permissions. These rural developments are located throughout the County.

3.12 These allocations, completions and commitments set out what a pattern of development would be under a 'business as usual' or 'do nothing' approach. Development would be focused in Abergavenny/Llanfoist, with Caldicot, Chepstow the other main location of development. In addition, smaller villages would receive a proportion of development and continued infill and conversions would result in a significant proportion of development in the rural area (not open countryside).

3.13 Figures show that these sources of delivery, subject to a review of outstanding allocations, could provide over 2000 of the new homes that need to be delivered by 2021 (the LDP period). This level of development

alone is unlikely to be able to accommodate the existing population given the falling household size in Monmouthshire, giving rise to a greater demand for housing.

Option appraisal assumptions

3.14 In addition to the assumptions on the general approach to growth options for each option it is also necessary to make assumptions on how they will be implemented.

Option 1:

- the vast majority of housing delivered under this option would be on existing commitments, including allocations with permission and allocations where permission is being actively pursued
- sites for approximately a further 1500 homes would have to be found
- this growth is likely to be required to accommodate the existing population as a result of reducing household size, therefore the overall population would only increase very slightly
- little opportunity to pursue a revised spatial strategy
- commensurate with a 'do-nothing' approach
- likely to see most development in Abergavenny/Llanfoist, Chepstow and Caldicot

Option 2

- largely in keeping with current delivery rate
- allow for additional allocations to allow a new spatial strategy to be implemented
- would require additional land, primarily on greenfield sites
- sites for approximately a further 3000 homes would have to be found

Option 3

- responds to the demand from the development industry
- requires additional development to primarily be located on greenfield land
- this option would result in new people moving in to Monmouthshire and an overall population rise
- sites for approximately a further 5000 homes would have to be found

	Option 1 – 250 dwellings per year (additional 1500 new homes)	Option 2 – 350 dwellings per year (additional 3000 new homes)	Option 3 – 475 dwellings per year (additional 5000 new homes)
Accessibility	<p>Distribution of this quantity of development is unlikely to have any great impact on the overall character of the area, reinforcing existing travel patterns and likely to be insufficient to provide the ‘critical mass’ of development necessary to delivery new services and facilities. However, to some extent this remains dependent on the spatial strategy.</p> <p>Lower levels of housing is likely to result in lower section 106 contributions from development. This may mean fewer community facilities are provided to meet the needs of residents. However, low population growth under this option will mean there is little increase in demand for facilities – but these existing facilities may become geographically less accessible as the towns and villages grow.</p>	<p>A medium growth level may have less opportunity to deliver growth in any one location that helps delivery of new community facilities, shops and services. However, this will depend on the spatial strategy selected, for instance if all growth is to be focused on a few settlements, or if it will be distributed around Monmouthshire. Very distributed development is unlikely to provide for greater accessibility, as housing will not be delivered at sufficient levels to be a catalyst for other types of growth – including employment and community facilities.</p> <p>Section 106 contributions can provide new facilities and services to meet the increased demand from new development. Under this growth option much will depend on the location of new development . The more distributed the development, the less likely it will be that this growth can deliver new services, as developer controls will not be sufficient. Therefore, the accessibility of services will also depend on development distribution.</p>	<p>The level of housing under this option, is more likely to deliver individual developments that have a critical mass of residents to support delivery of new services. Depending on the spatial strategy, there is the potential that high levels of development can encourage regeneration and renewal of towns and villages that are currently lacking community facilities, shops and services, therefore improving accessibility. This level of housing growth would need to be matched by growth in employment and services to deliver more sustainable development.</p> <p>Part of delivering more accessible facilities will be successfully negotiating and obtained section 106 contributions from development. This will be essential in making sure new housing development has access sufficient services and facilities, including schools, health centres and libraries. Due to the population growth anticipated by the option it will be essential that contributions are secured to meet needs and existing services will be put under considerable strain.</p>
Housing	<p>This level of development is unlikely to be able to deliver quantities of housing to meet affordable housing needs.</p>	<p>This level of development may not be sufficient to deliver sufficient affordable housing to meet needs.</p>	<p>This level of housing is more likely to be able to deliver the quantity of housing needed to provide affordable homes to meet need.</p>

Community	<p>Low growth levels may mean that housing in Monmouthshire becomes increasingly expensive. This may push local people and families out to more affordable areas. This could result a less diverse social and demographic mix of people in Monmouthshire. This could have adverse impacts on existing community character. Low levels of section 106 contributions, under this option, is also unlikely to be provide sufficient funds for provision of new community facilities.</p>	<p>The level of growth under this option has the potential to help local people remain in Monmouthshire, retaining community character and a demographic and social mix. However, this will also depend on distribution of development. There is the risk that under some distribution options this level of growth will not be sufficient to support a good level of new community facilities, as part of creating new sustainable neighbourhoods. Therefore, piecemeal development directed to some areas could reinforce the role of towns and villages on the M4 corridor as 'dormitory settlements' with little local community character or cohesion. Section 106 contributions under this option may help to provide new community facilities. However, whether these are sufficient for new facilities, will depend on level of growth in any one area.</p>	<p>This option is likely to result in population growth in Monmouthshire. Depending on the location of new development, this has the potential to change the character of existing communities. However, this option would also be most likely to be able to allow local people to remain living in Monmouthshire – with benefits for local community character. There is the risk that under some distribution options this level of growth is not sufficient to support a good level of new community facilities. Therefore, development directed to some areas could reinforce the role of towns and villages on the M4 corridor as 'dormitory settlements' with little local community character or cohesion. The levels of section 106 contributions, which may come from large amount of new housing in any one area, could make significant contributions to new community facilities.</p>
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Biodiversity, landscape and land/soil	This option would result in the lowest land take. Therefore, it is most likely that delivering this level of growth would have least impact on the environment. The benefit could be greater still as the low level of growth means that there are more options for sites to deliver growth. This choice means that it is more likely to be possible to find sites that avoid biodiversity and landscape impacts. A greater proportion of development could also be located on previously developed sites.	As more land will be required to deliver this level of growth it is more likely to have an impact on biodiversity and landscape. The level of development may mean it is still possible to select sites that avoid harm to biodiversity and landscape, depending on the chosen approach to spatial distribution. If this medium level of development is too widely distributed it may mean that opportunities to integrate biodiversity and new open spaces into single development schemes are lost. More piecemeal development may not be able to deliver the joined-up approach needed to create sustainable neighbourhoods, with a range of built and natural environment enhancement.	The high level of growth will result in a greater amount of land required for development. This will therefore have an inevitable greater impact on biodiversity, landscape and land take. Only a small proportion of development can be located on previously developed sites. The quantity of development will make it difficult to choose sites where landscape and biodiversity impacts can be avoided entirely. Therefore mitigation measures will be needed to reduce the significance of these impacts. Larger development sites may also be able to better integrate biodiversity enhancement measures and open space provision as part of an cohesive and integrated scheme to deliver new sustainable neighbourhoods.
Built environment and historic heritage	It may be easier to reduce the impacts on the built and historic environment through delivering a smaller amount of housing. However, there may be fewer opportunities to deliver larger built environment benefits such as town and village regeneration schemes that would be funded, in part, by developer contributions.	This level of development, depending on the distribution approach chosen, could help in the regeneration of some towns or villages. As long as principles of good design are followed this development could contribute to the built environment.	The levels of developer contributions, which may come from large amount of new housing in any one area, could make significant contributions to regeneration and renewal of towns and villages. There is a risk that the scale of development under this option could bring major changes to the quality and built character of existing towns. Principles of good quality urban design would need to be followed. This is to ensure this large level of development does not harm the current built character of Monmouthshire towns and villages, and enhances it were possible.

Air	<p>Lower growth would lead to fewer new homes in Monmouthshire is likely to correlate to fewer cars, and therefore potentially lower exhaust emissions. However, this low growth also may cause patterns of development that give rise to increased need to travel. This could be from:</p> <ul style="list-style-type: none"> •lower income groups pushed out of Monmouthshire due to lack of affordable homes yet continuing to commute to work within the County •development more likely to be dispersed throughout the County leading maintenance of current travel patterns •development at levels too low to support any significant new provision of jobs or community facilities in Monmouthshire reinforcing existing travel patterns, as people leave the area for work 	<p>More new homes are anticipated under this option, this is likely to lead to more cars on the road. There is the opportunity under this option to distribute development in ways that help reduce car travel, such as locating development near employment, or helping create new sustainable neighbourhoods that include new services.</p>	<p>Higher levels of development anticipated under this option are likely to mean more cars on the roads in Monmouthshire. New development, depending on distribution, could help reduce existing levels of out-commuting in Monmouthshire by locating housing in areas that are also attractive to employers and therefore encouraging employment growth. Larger scale new developments could also include the delivery of new community services and facilities. In addition, the new population delivered by this level of growth could help provide the 'critical mass' necessary to support retail and other services (including public transport). This may help create a greater level of self-containment and therefore reduce car travel.</p>
Water quality and supply	<p>Fewer new homes is likely to require less water supply and sewerage infrastructure. However, the level of development is unlikely to be able to generate developer contributions to meet water infrastructure up-grading, should it be required, for smaller towns or villages.</p>	<p>Water and sewerage demand under this option will be a medium levels under this option. Depending on the spatial distribution of development it may also be possible to fund infrastructure improvements, if necessary, on new development sites.</p>	<p>Overall water and sewerage requirements would be greatest under this option. The levels of section 106 contributions, which may come from large amount of new housing in any one area, could make significant contributions to new water and sewerage infrastructure.</p>
Flood	<p>The lower level of development under this option means it is more likely to be possible to avoid all greenfield areas at flood risk.</p>	<p>More development may result in greater need for some development to be at areas at flood risk.</p>	<p>More development may result in greater need for some development to be at areas at flood risk. Development will have to follow tests set out in TAN15: Development and Flood Risk (2004).</p>

<p>Energy and waste</p>	<p>The lower level of development under this option means lower levels of energy use and waste generation from new development. However, if no single large strategic development sites are identified for development there may be fewer opportunities for strategic local renewable energy provision.</p>	<p>More development is likely to result in more energy and waste production from development. It will be necessary to ensure all development is built to high efficiency standards and incorporate measures to help reduce waste and encourage recycling. Opportunities will need to be taken to ensure larger development sites integrate low carbon community heat and power schemes – including use of renewable energy technologies.</p>	<p>More development is likely to result in more energy and waste production from development. It will be necessary to ensure all development is built to high efficiency standards and incorporate measures to help reduce waste and encourage recycling. Opportunities will need to be taken to ensure larger development sites integrate low carbon community heat and power schemes – including use of renewable energy technologies.</p>
<p>Economy</p>	<p>This option is unlikely to have any great impact on economic growth in the Monmouthshire. There is the risk that low levels of housing will push families and those on lower incomes out of the County, this may have an impact on businesses as there is less available workforce in the local area.</p>	<p>This level of growth, depending on distribution, could help encourage economic growth. New housing could be located in areas with good existing or prospects for economic growth. New housing would help provide the workforce necessary for growth.</p>	<p>This high level of housing would need to be matched by economic growth. It may be that land availability means that growth levels set too high to impact on the ability of businesses to find suitable sites for development. Once land has been allocated for housing it is unlikely to be developed for employment use, even if suitable, as housing land values are greatly in excess of employment land values – making the former the preferred option for landowners.</p>

4 Sustainability appraisal of spatial options

Introduction

- 4.1 Getting the strategy right, in terms of contribution to sustainable development, is essential in helping to create a sustainable LDP that will shape the future pattern of development and contribute to more sustainable ways of living.
- 4.2 One of the principle roles of a spatial strategy is to deliver more sustainable development reducing reliance on car travel. This can be done through policies which support public transport improvements and walking and cycling routes. However, more important than this a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place. This includes frequency and number of trips and access from homes to jobs, schools, shops, health services and other community facilities.
- 4.3 An approach to a spatial strategy that focuses development into only a few towns or villages could help create new 'sustainable communities', deliver regeneration and renewal of village centres and secure developer contributions to deliver new community and leisure facilities. However, this option of large scale development may mean inequitable distribution of impacts on communities and the natural and built environment, which could be positive and negative.
- 4.4 Alternatively, more distributed development around the County could help dilute impacts on the natural and built environment in any one location. It could also help meet housing needs throughout the area. However, this option may not deliver development at the levels needed to secure benefits, such as development not reaching the 'critical mass' of new population necessary to support new services and facilities and deliver necessary infrastructure improvements that need to be funded from developer contributions. This approach would also miss opportunities to deliver a new a pattern of development in Monmouthshire, and simply reinforce existing unsustainable patterns of development that favour car use.

Spatial strategy appraisal

- 4.5 In order to undertake the sustainability appraisal of spatial strategy options it is necessary to set out the basis on which these assessments are made. Assessment needs to take make certain assumptions about development delivery.

Assumptions

- Options refer to the distribution of general market housing, and therefore rural exception sites for 100% affordable housing could be delivered outside the chosen strategy.

- For the SA of these options it has been assumed that growth would take place at medium to high levels
- No option rules out infill development in villages (possibly with the exception of some villages that fall below a 'sustainability' threshold)
- Development may include allocation of large scale previously developed sites within settlements, if available, but will be primarily on greenfield extensions
- At this stage it has to be assumed that there is available capacity for any option to be pursued, however more detailed analysis on the availability of deliverable sites and environmental constraints may mean that this not the case in practice.
- Housing growth in towns with good employment is more likely to be contribute to self-containment and reduced need to travel than more dispersed housing development.
- The appraisal considers impacts and operation of the market in the long-term, over the whole plan period. This means the current economic downturn factored into the assessment, despite the inevitable impacts on current delivery and growth.
- Realignment of the M4 has not be included in any appraisal.

4.6 The appraisal of spatial options is in the form of a matrix for each one. These matrices set out the option, as described in the Options Report (December 2008). They then contain a list of bullet that describe the option in greater detail, as it appears in the Option Report. These bullet points also include any assumptions it has been necessary to make in order to appraisal the approach. There is then a description of the possible impacts on sustainable development from implementing each option, compared to the sustainability objectives selected for the appraisal.

Spatial option A	
Focus development within or adjoining the three main towns of Abergavenny, Chepstow and Monmouth where there is the best access to jobs, services and public transport.	
<ul style="list-style-type: none"> • focuses development in the key settlements, as identified by the Wales Spatial Plan update, and Monmouth that performs an important function for Monmouthshire • all towns have relatively good provision of jobs, services, community facilities and shops • Chepstow and Abergavenny have railway stations • all three towns are quite constrained by environmental sensitivity and flood risk 	
Accessibility	<p>This option would help provide development that has a good range of accessible jobs, services and shops for future residents. Providing equality of access is essential as part of intragenerational sustainable development. It is important therefore to ensure that those who cannot or choose not to drive a car are not put at an unfair disadvantage in terms of getting to work, essential shops or community services. For this reason a focus on town development, rather than development in the rural villages where there are fewer services, is likely to be preferable for achieving sustainable access. The Three Towns already have the highest levels of self-containment for work. With up to 70% of people in Monmouth living and working in the town and 55% for Abergavenny. This is reflected in figures for distance travelled to work, with around 50% of Abergavenny and Monmouth employees travelling under 5km to work (slightly lower for Chepstow). Therefore, if development of new housing and employment proceeds in keeping with existing trends there could be good accessibility to employment in the these towns.</p> <p>The options would not solve any of the issues of access that currently exist in the Severnside area. Developer s106 contributions could be used to deliver new community services if development was directed to these areas. The more rural village would also suffer by not allowing sufficient population growth to support new and existing services. This would possibly have a adverse future impact on accessibility in these areas.</p>
Housing	<p>This option would help provide affordable homes in accessible locations for residents of the Three Towns.</p> <p>However, this may adversely impact on the delivery of affordable housing in other towns and villages, particularly in the rural area where affordability may be a significant issue.</p>
Community	<p>Especially under high growth approaches this option could see changes to the character of the towns, with an increase population resulting in some change of character. However, these towns would be most able to accommodate this growth given their current size.</p> <p>New development could deliver developer contributions that could help bring new or improved community facilities to the towns.</p> <p>This option misses opportunities to deliver community benefits to other towns and villages. The lack of affordable housing provision may have significant adverse impacts on some communities as young people and families are priced out of the area. Resulting in a lack of social and demographic diversity in villages, impacting on their current community character.</p>
Biodiversity, landscape and land/soil	<p>All three of these towns have environmental constraints to their development. Therefore, their growth risks adverse impacts to biodiversity and the landscape. A large proportion of development would have to be located on greenfield land, given the lack of previously developed land in any one of these towns.</p> <p>Under higher growth options there is also the risk that it will be difficult to</p>

	avoid sites with high quality natural environment assets, therefore increasing the likelihood of significant adverse impacts.
Built environment and historic heritage	High growth options may result in large changes to the built form and character of these three towns. This include the historic form of the towns and views out to the surrounding hills. However, it may be possible to avoid significant impacts through good quality design and urban layouts that respect existing import views and protected ridgelines. This option also misses out opportunities for housing development to help deliver renewal and regeneration of areas currently suffering from a poor quality urban environment.
Air	These impacts relate closely to the impacts identified under accessibility. It is likely that this option would help put housing in towns where there is already good access to shops, services and jobs, promoting greater self-containment. This could help to reduce car use from new development, as people would not have to travel far to meet their day-to-day needs. To achieve this it would be necessary to link new housing with the provision of high quality employment land, in order to help stimulate the delivery of new jobs over the plan period. The Three Towns already have the highest levels of self-containment for work. With up to 70% of people in Monmouth living and working in the town and 55% for Abergavenny. This is reflected in figures for distance travelled to work, with around 50% of Abergavenny and Monmouth employees travelling under 5km to work (slightly lower for Chepstow). Therefore, if development of new housing and employment proceeds in keeping with existing trends this could help limit the need to travel and continue to achieve more self-containment. Commuting out of Wales and to other authorities in Wales is inevitable for Monmouthshire. Chepstow and Abergavenny are have train stations, therefore commuting from these towns can be made by this more sustainable mode of transport. Therefore, this option could help to reduce car travel and therefore air quality impacts. However, this option would not tackle any of the currently unsustainable travel patterns elsewhere in the County. For instance new housing provided in other areas with good employment or employment potential. Or new housing that could help deliver new community facilities, shops and services, as part of helping people meet their day-to-day needs locally.
Water quality and supply	New development concentrated in these three towns will need to ensure that there is sufficient water supply and waste water infrastructure in place to accommodate growth. New development will have to ensure that water efficiency measures are put in place to reduce overall water demand.
Flood	All three of these towns are affected by flood risk. This may constrain the developable areas within and around the towns. However, so long as the tests set out in TAN15 are followed, and it can be shown that development in flood prone areas achieves other sustainability benefits it may still be the most suitable location for development.
Energy	This option is likely to include large new development sites. The development of larger 'urban extensions' may present greater opportunities for the delivery of low carbon heat and power. This can be as part of district or community heat and power. It is likely to be more financially viable to integrate these schemes into larger developments to be delivered by a single developer, rather than in multiple smaller schemes. It may also be possible to set specific policy for higher targets to be met on strategic sites.
Economy	This approach will help support the economy of the Three Towns by providing

	<p>a workforce for existing, expanding and new employment in the town. However, both Chepstow and Monmouth are located in close proximity to other towns and cities with strong economies and therefore new homes in these locations may not necessary help the local economy.</p> <p>This option does not necessary support the economy of other towns and villages. New housing is necessary to provide a workforce for businesses, therefore focusing on these three settlements may adversely impact on workforce availability in other locations. However, these three settlements are relatively well distrusted throughout the County and it may be that development in these locations can provide a workforce for these other businesses. This may have an adverse impact on reducing the need to travel and providing employment that is equally accessible to all.</p>
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Spatial option B	
Focus development on the 'Severnside' area around the M4 corridor in an attempt to harness its strategic location to promote and achieve a 'critical mass' to boost public transport, employment services and community facilities.	
<ul style="list-style-type: none"> • This would see development in, and around, Caldicot, Portskewett, Magor/Undy, Rogiet and Sudbrook • All of the towns/villages, with some exception in Caldicot, are predominantly residential development with very few services and jobs • The area is well connected by rail to Newport, Cardiff and Bristol and therefore there is the potential for more sustainable travel from these areas • Good connection by road and rail may be a catalyst for much of the area becoming a 'commuter' town for those who live elsewhere • Some parts have poor access to the road strategic highway network, e.g. Sudbrook 	
Accessibility	<p>At the current time residents in these areas have very poor access to facilities and other everyday services within a walking distance, or short public transport trip, from their homes. The area also have very little local employment. Road links means that people access jobs further away. However, this is inequitable favouring those who travel by car despite some rail access from Severn Tunnel Junction Station.</p> <p>2001 census figures show that these towns have low levels of self-containment for work. For instance 65% of residents of Magor/Undy work outside Monmouthshire, and almost 90% travel over 5km to work – the highest in Monmouthshire. Other towns perform slightly better in this area, but generally worse than other towns. Therefore, unless matched by new employment delivery pursuing this option could adversely impact on objectives to ensure new residents have accessible local employment.</p> <p>If this option was pursued there would have to be clear policy in place to link housing growth with development of other facilities, including community services, shops and also employment. Housing growth has, so far, not helped deliver these other types of development. Therefore, without the policy tools to properly control delivery of housing development and associated jobs and services, putting new homes here could exacerbate poor access issues.</p> <p>The Sudbrook area has particularly bad access to jobs and services, even by car, as road routes are constrained by the railway that cuts the area off from Portskewett. Development in this location may be reliant on improved railway crossings.</p> <p>This option also does little to tackle issues of accessibility in the other settlements of the County. No new housing growth to these other areas could potentially harm the continued viability of town and villages centres. A stagnating or falling population could harm the viability of businesses and community facilities in these areas, reducing the accessibility for the remaining population.</p>
Housing	<p>This approach would not necessarily be providing housing in the locations of the County necessary to meet local needs. Development in this location may attract more inward migration along the M4 corridor, with the risk that new housing in this part of the County would be doing very little to meet the housing needs in wider Monmouthshire. This is notable by the proportion of residents who have to travel out of the area for work (up to 65% of Magor/Undy leave Monmouthshire to work, almost 90% travelling over 5km). It is unlikely that the impacts of this approach on housing availability in the County would be very positive.</p>

Community	<p>These housing areas have suffered from an erosion of community character and cohesion, as new development has contributed to these towns and villages becoming increasingly characterised as 'commuter towns'. This means, although people live in the area they often work, shop and spend their leisure time elsewhere, as evident from travel to work figures. New development, subject to suitable controls, could help deliver new services for the community. This could help improve the community character of the area, although may be unable to make up entirely for previous shortfalls. This option also does little to help retain community character and cohesion in other towns and villages of Monmouthshire. This option will limit growth in other areas, thereby protecting these communities from rapid change. However, these communities may suffer from increasing house prices leading to other changes in community character as younger people and local families are priced out. This will result in a change in the social and demographic make up of these towns and villages.</p>
Biodiversity, landscape and land/soil	<p>This option would require new land to be developed, the majority likely to be greenfield, although there is some previously developed land available in the Severnside area. Biodiversity and landscape impacts will depend on the exact choice of sites, and there may be a range to choose from. However, if growth is at the higher end then it may be that there is little choice of sites, due to constraints such as the M4 and flood plain. This may lead to a greater impact on biodiversity and landscape, as avoiding impacts entirely is not possible. In these circumstances mitigation and design of development will need to be used to reduce harm. Due to the location adjacent to the internationally designated nature conservation sites there may need to be particular emphasis on protecting biodiversity assets, and the integrity of these sites.</p>
Built environment and historic heritage	<p>This option could help enhance the built environmental character of these areas. With the exception of Caldicot, many of the towns and villages in this area lack any buildings of high quality 'feature' character. New development could help address this through promoting high quality design and urban form, creating new notable new developments.</p>
Air	<p>It is unlikely that this option will ever deliver self-containment, given the current lack of jobs and services in the area. Therefore, development in south of the M4 is likely to remain reliant on the access provided by the M4 to get to jobs, shops and leisure facilities –in and outside Wales. This means that new development in these areas is likely to give rise to increased car travel, and negative impacts on air quality.</p> <p>2001 census figures show that these towns have low levels of self-containment for work. For instance 65% of residents of Magor/Undy work outside Monmouthshire, and almost 90% travel over 5km to work – the highest in Monmouthshire. Therefore, if this pattern was continued it could lead to adverse impacts on air quality through increased car use.</p> <p>To help minimise these impacts new residential development would have to be delivered in conjunction with more local employment and services, as well as improvements to public transport. This could include improvement links to the existing station at Severn Tunnel Junction, and perhaps a new station at Magor/Undy.</p> <p>The lack of housing in other towns and villages of the County, may also push young people and local families out of the area, while they remain working in Monmouthshire, leading to unsustainable travel patterns. This could increase the need and distance travelled, with adverse impacts on air quality.</p>
Water quality and	<p>New development concentrated in these three towns will need to ensure that</p>

supply	there is sufficient water supply and waste water infrastructure in place to accommodate growth. New development will have to ensure that water efficiency measures are put in place to reduce overall water demand.
Flood	Much of this area is at risk of flood, this may constrain options for growth. However, so long as the tests set out in TAN15 are followed, and it can be shown that development in flood prone areas achieves other sustainability benefits, and risks are minimised, this may not overly constrain development.
Energy	This option is likely to include large new development sites. The development of larger 'urban extensions' may present greater opportunities for the delivery of low carbon heat and power. This can be as part of district or community heat and power, as it more viable to integrate these schemes into larger developments to be delivered by a single developer, rather than in multiple smaller schemes. It may also be possible to set specific policy for higher targets to be met on strategic sites.
Economy	<p>This option may help stimulate economic growth in this part of the County. However, previously housing growth alone has not been sufficient to achieve associated economic growth. Therefore, to achieve these aims there may need to be active policies in place, not only through the LDP, to achieve economic growth in this locations. There should be good potential for this type of growth in this location due to the good road and rail connections of the area.</p> <p>It is not clear what the capacity is of land available for development in this area, but if development levels are set too high it may be that less land is available for employment. This may adversely impact on the ability of the area to attract new businesses to the area.</p> <p>Focusing all development in this M4 corridor may adversely impact on the congestion of the motorway, potentially having adverse impacts on the wider economy of south Wales.</p> <p>However, this option may stifle economic growth in other parts of the County as limited housing growth in these areas may limit the available workforce. As housing becomes less affordable in these areas younger people will be pushed out the County, thereby impacting on the mix of the workforce to serve employers.</p>

Spatial option C	
Distribute development proportionately across rural and urban areas to meet housing needs evenly throughout the County, although focusing in the rural areas on those towns and main villages where there is a basic level of services and facilities.	
<ul style="list-style-type: none"> • Distribution may be to up to 30 towns and villages through out Monmouthshire • The development will be pro-rata of existing population, therefore even under higher growth options the allocations in some villages will be less than 10 dwellings per annum – therefore representing very little change • Villages chosen for development would only be those identified as having a minimum level of services, including a primary school and local shop 	
Accessibility	<p>Providing new homes throughout the County could have some advantages for accessibility. This is by helping to create, or maintain, a population level that supports local services, businesses and retail in small towns and villages. This is essential for accessibility and reducing the distance and need for people to travel. However, even if development is only directed to those small towns and villages (in addition to main towns) that are relatively 'sustainable' (containing facilities such as a primary school or shop) problems of access to facilities will remain apparent. This is because it is very likely that people living in smaller settlements will need to travel everyday for work, school, food shopping, or leisure purpose. This is likely to favour those who drive, so be less equitable for those who cannot or do not own a car. These problems of access may be particularly apparent for those on lower incomes who may become more isolated in villages, enhancing the risk of pockets of deprivation throughout the County. This means it may be preferable, in sustainability terms, to only select those towns and villages with quite a good range of existing services, employment potential and good public transport access, as the focus for new development.</p> <p>This option does not set a pattern of development that can be sustained in the long-term particularly with the likelihood of long-term increase in fuel prices. It also misses the opportunity to deliver housing at levels, in any settlement, that is necessary to help deliver sustainable neighbourhoods supported by new service provision.</p>
Housing	<p>This option could help meet affordable housing needs throughout the County. Existing policy of permitting 100% rural exception sites in any village location has not been successful in delivering these homes. The reason is likely to be because there is no financial incentive for developer to build this type of development. Therefore, this option would allow market housing in villages to fund affordable housing in villages.</p> <p>However, this option would see lower levels of housing development in larger towns and villages (as a result of the distribution). This may impact on delivery of homes to meet needs in these areas where there may be the greatest demand.</p>
Community	<p>This option is more likely to help support local communities throughout the County, by allowing housing to be provided to meet the needs of a shrinking household size, and potentially natural growth. To retain community character the proportion of affordable housing provided in rural communities may need to be higher than elsewhere. This will help retain a demographic and social mix of population necessary to retain a vibrant community, and keep services such as village schools open. Without this it could encourage the development of more commuter villages that have little 'life' in them during the day.</p> <p>Developer contributions from development can help to provide new facilities</p>

	for communities. It is likely that a pro-rata distribution of development will not provide the levels of contribution necessary in smaller villages to provide for new services. This may put strain on existing villages services in some instances. In addition, the quantity of development to the main towns may not be sufficient to provide the developer contributions needed deliver community benefits in these towns, including regeneration and renewal.
Biodiversity, landscape and land/soil	The biodiversity impacts of this policy may be the lowest. As each settlement, including the main towns, is likely to receive a lower quantity of development there is greater likelihood that biodiversity and landscape impacts can be avoided. However, some development may have to occur in the AONB, and this may have landscape impacts, although sensitive design and use of vernacular materials can help limit the extent of these impacts, and therefore should not preclude development in these areas.
Built environment and historic heritage	This option is likely to see less large scale change to any one settlement. This will limit the overall changes to built environment character. Development in and adjacent to villages may also help retain the built character of 'high streets' or village centre as the focus for shopping and community life. More dispersed development may mean that opportunities for town centre or village centre development are lost. Lower levels of development will mean lower developer contributions that can play an important role in regeneration and renewal.
Air and climate change mitigation	This option may result in greater impacts on air quality than others. This is because the very dispersed pattern of development is likely to correspond with increased need and distance people need to travel to meet their everyday needs. Although, this option may help to support some local services, it is likely to remain the case that many residents of these new homes still need to travel to large towns and cities for work and for any more than their essential shopping needs. Travel is likely to be predominantly by car, as the most viable option for most people. Therefore, having adverse impacts on air quality and not helping mitigate against climate change.
Water quality and supply	New development concentrated in these three towns will need to ensure that there is sufficient water supply and waste water infrastructure in place to accommodate growth. Developer contributions may not be sufficient to cover infrastructure improvements that are needed in some villages to improve water supply and sewerage. New development will have to ensure that water efficiency measures are put in place to reduce overall water demand.
Flood	This distributed development option can help avoid putting new development in locations where there is a risk of flood.
Energy	This option is likely to mean that a large proportion of development comes forward on smaller development sites. This may present more of a difficulty based on financial viability of integrating community or district heat and power. In some instances finding source on on-site renewable energy generation may be difficult on smaller constrained sites.
Economy	This option may help to support the economy of smaller towns and villages. However, the overall level of development in these locations may not make a significant difference to the population of these settlements. Lower levels of housing growth in larger towns may mean more land is available for employment growth. This could potentially help encourage economic growth in these areas making up for a previous shortfall in jobs in these communities. Housing has not proven to stimulate economic growth in Monmouthshire to any greater extent. It may be that without other policies or strategies in place

	to encourage employment the majority of people continue to travel elsewhere for work.
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Spatial option D	
Focus development on sites and settlements where opportunities exist for large scale mixed development to enable new residents development to be accompanied by an associated increase in employment opportunities.	
<ul style="list-style-type: none"> the majority of new housing will be delivered as part of mixed use schemes the majority of schemes will be urban expansion, although where possible it will include urban previously developed land all new developments will be associated with one of the named settlements or developed areas. These are: Chepstow, Monmouth, Caldicot, Magor/Undy and Raglan 	
Accessibility	<p>New mixed use development can help provide jobs and services that are very accessible, making up part of the same overall development. If the mixed use schemes are successful in attracting new employment to the area there can also be benefits for existing communities, providing new accessible services and potential better self containment of these towns.</p> <p>Raglan and Magor/Undy currently have low levels of self-containment in terms of where people live compared to where they work, at about 15% and 20% respectively. This option has the potential to re-address these issues by creating new accessible jobs in these locations.</p> <p>There is also the risk under this option that urban extensions will not be of sufficient size to deliver a fully mixed development. Taking the 2001 census the average household size in Monmouthshire is 2.41 people, this means that to support:</p> <ul style="list-style-type: none"> a new primary school or Community Centre around 1660 new homes would need to be built a local shop an extension need to be around 600 new homes a local centre over 2400 new homes a secondary school up to 3300 new homes¹ <p>Given that land needs to be found for up to 5000 new homes decision will have to be made on how big extensions will need to be to accommodate functional mixed use developments that really have the potential to deliver more accessible services.</p> <p>The lack of new development to other towns and villages may stifle any improvements to accessibility in these towns. The population of these other towns and villages may fall as fewer affordable houses are provided leading to young people and families moving away to more affordable locations. The new mixed use schemes may also encourage businesses to relocate within Monmouthshire, adversely affecting accessibility of jobs and services in those locations that are not the focus for growth.</p>
Housing	This approach will help meet housing needs overall in Monmouthshire, but not necessarily related to any particular areas of need. This may adversely impact on affordable homes being made available in the remaining towns and villages of the area. Lack of affordable homes may result in young people and local families becoming priced out of the area.
Community	These large mixed use extensions, depending on being of a suitably large size, have the potential to support the creation of new sustainable communities. This type of community could have its own community identity, and access community facilities as part of the mixed use development. However, achieving this type of new community would require careful policy

¹ Barton, H., Grant, M., and Guise, R. *Shaping Neighbourhoods: a guide for health, sustainable and vitality* (Spon Press, 2203), figure 4.9

	<p>control and masterplanning of a new scheme, and delivery that ensures community infrastructure is in place at an early phase of the project. Large new extensions, depending on their implementation, could also change the character of existing settlements. This may particularly be the case where the town currently has a relatively small population size, such as Raglan and Magor/Undy. Again, the extent of this impact and whether it will be detrimental or beneficial, will depend on delivery, the range of new services provided and careful integration with the existing urban area. In the two identified areas there is the potential for new employment to facilitate the creation of greater self-containment and more of a community identity in towns.</p> <p>This option also does little to help retain community character and cohesion in other towns and villages of Monmouthshire. In these communities house prices may increase leading possible detrimental changes in community character. As younger people and local families are priced out there will be a change in the social and demographic make up of these towns and villages.</p>
Biodiversity, landscape and land/soil	<p>It is implied in this option that the Council are already aware of potential sites in these five locations with the capacity to accommodate large scale mixed use development. However, at this stage of the SA it is not possible to undertake any site specific sustainability assessment. Therefore, it is simply the scale of proposed development that is considered against these sustainability objectives.</p> <p>It is likely that the large extensions would have some impact on biodiversity and landscape, with some impacts unavoidable due to scale of development. Larger development sites should be able to integrate biodiversity enhancement measures and mitigation should help protect existing assets. Expansion in Magor/Undy and Caldicot, near the internationally protected sites in the Severn Estuary, will need to pay particular attention to protecting the integrity of these sites. This will include considering the importance of land outside the designations for the continued viability of the sites themselves.</p>
Built environment and historic heritage	<p>The large-scale mixed-use developments proposed under this option are very likely to result in a change to the built character of the towns. High quality building design and urban layout can be used to ensure new development contributes to the existing character of these areas, integrating well into the existing urban form.</p> <p>This option may limit the quantity of housing elsewhere in the County. This may have an adverse impact on the ability of these areas to fund and implement built environment regeneration and renewal, where it is anticipated this will be reliant on developer contributions.</p>
Air	<p>This option may help reduce the need to travel in the towns that receive growth. The aim would be for mixed use developments to help improve self-containment of towns, providing new jobs and services that are easily accessible a short distance from the place where people live. Currently there are high levels of out-commuting for work with insufficient quality jobs available in the County, particularly in Raglan and Magor/Undy. Therefore, encouraging self-containment could help reduce car use, and encourage more sustainable modes of transport. With benefits for sustainable development.</p> <p>This option may also help improve accessibility to jobs and services for existing residents of these towns. However, for this to be achieved it would be necessary to ensure that these new developments are well integrated into the towns, with good connections by walking, cycling and public transport. Commuting out of Wales and to other authorities in Wales is inevitable,</p>

	<p>particularly from those settlements with very good connections to the surrounding area. There will be air quality impacts, although a higher proportion of trips from Chepstow and Caldicot may be by public transport as there are train stations here.</p> <p>However, this option would not tackle any of the currently unsustainable travel patterns elsewhere in the County. For instance, new housing provided in other areas with good employment or employment potential. Or new housing that could help deliver new community facilities, shops and services, as part of helping people meet their day-to-day needs locally.</p>
Water quality and supply	New development concentrated in these three towns will need to ensure that there is sufficient water supply and waste water infrastructure in place to accommodate growth. New development will have to ensure that water efficiency measures are put in place to reduce overall water demand.
Flood	All of the towns identified have some risk of flood within or around them. However, so long as the tests set out in TAN15 are followed, and it can be shown that development in flood prone areas achieves other sustainability benefits it may still be the most suitable location for development.
Energy	This option is likely to include large new development sites. The development of larger 'urban extensions' may present greater opportunities for the delivery of low carbon heat and power. This can be as part of district or community heat and power, as it more viable to integrate these schemes into larger developments to be delivered by a single developer, rather than in multiple smaller schemes. It may also be possible to set specific policy for higher targets to be met on strategic sites.
Economy	This option seeks delivery of new high quality employment land as part of mixed use development schemes. This can have positive benefits for encouraging the employment growth in Monmouthshire. Policies would have to be in place to actively encourage new high quality employment to Monmouthshire. Therefore, the choice of sites may need to consider which type of location and site is favoured by new and expanding businesses, and this may have implications for the preferred choice of urban extension. In some instances this may not be compatible with other sustainable development objectives.

5 Other sustainability implications of the LDP

Employment

- 5.1 The LDPs role in helping to delivery employment has been raised as an issue through the spatial options, although these and growth options relate primarily to housing.
- 5.2 Anecdotal evidence suggests that previously housing delivery has not been very successful in stimulating employment growth. Leading to areas where rapid housing growth has not been matched by employment or service delivery. This has created areas, for example in Magor/Undy where most of the population commute out of the area everyday for work, shopping and leisure. This mismatch of residential growth to local jobs and services is not compatible with sustainable development.
- 5.3 Development patterns of this type lead to increased car use, with negative environmental, pollution and health impacts. This development can also lead to social isolation where people who can, or do not, drive have poor access to essential services and work. This can impact lower income households disproportionately hard, due to the increasing costs of running a car. Living in these areas may also require some families to own two cars to be able to get to the jobs and services they need.
- 5.4 Some level of out-commuting will always happen from Monmouthshire, given the good access that much of the County has to strong economic centres, such as Cardiff and Bristol. However, it should be the intention of the plan to help reduce the gross overall commuting levels by providing new, high quality, employment in the area to meet the skills of the existing workforce.
- 5.5 Therefore, the LDP will have to address employment growth as part of the spatial strategy. This could include making sure all employment allocations are compatible with the type of site and facilities businesses are looking for. Options should not be pursued where there is not a reasonable certainty that there will be parallel delivery of new jobs, services and facilities in the local area. However, this will have to make sure economic growth is not pursued at the expense of other sustainability objectives.

Retail and other services

- 5.6 The location of new retail development and other community services and leisure facilities can have an impact on setting sustainable development patterns. Therefore, the LDP spatial strategy will have to include consideration of how the growth and distribution of these resources can contribute to more sustainable development.

Climate change

- 5.7 The biggest influence on climate change mitigation the choice of spatial option can have, is by setting patterns of development that reduce the need, and distance, travelled by car. The development of larger 'urban extensions' may also present greater opportunities for the delivery of low carbon heat and power. This can be as part of district or community heat and power, as it more viable to integrate these schemes into larger developments to be delivered by a single developer, rather than in multiple smaller schemes.
- 5.8 At this stage in LDP preparation the only real implication for climate change adaptation that it is possible to identify is related to flood risk. To reduce increased risks associated with flooding, as a result of climate change, development should be directed away from areas at high risk.

Site specific options

- 5.9 The Options Document (December 2008) contains some options relating the possible sites for development. These have not been subject to appraisal at this time. The reason is that these sites are all the outcome of the 'call for sites' exercise. Therefore, there is not certainty that these sites would even be suitable in terms of creating a more sustainable spatial strategy and have not been tested for suitability in any way.
- 5.10 The sustainability of sites will be part of a site appraisal by Monmouthshire officers, and the first stage may be to rule of those sites that do not fit with the spatial strategy. The sustainable appraisal of a more full version of the LDP will cover more detail on the impacts on sustainability from developing specific sites.

Appendix 3

Sustainability Appraisal of the 'Hybrid' Option

Spatial option: 'Hybrid' (preferred option)	
<p>Focusing the majority of development within or adjoining the main towns of Abergavenny/Llanfoist, Chepstow and Monmouth where there is the best access to jobs, services and public transport. However, a substantial quantity of development would also be directed to rural locations, primarily to meet rural housing needs. Development would also be located in Magor/Undy where there are few local services.</p> <p>NB This is the preferred option and is appraised in greater detail in the assessment of strategic policies that are included in the main sustainability report, including a review of allocated sites.</p>	
<ul style="list-style-type: none"> • focuses development in the key settlements, as identified by the Wales Spatial Plan update, as well as Monmouth and Caldicot that also perform an important function for Monmouthshire • the four towns have relatively good provision of jobs, services, community facilities and shops • Magor/Undy will also be the focus of a medium/large greenfield expansion, this settlement has poor provision of community facilities • Chepstow, south Caldicot and Abergavenny have railway stations • growth areas are quite constrained by environmental sensitivity and flood risk • rural sites will be designated only in 'sustainable' villages, these will have access to a school, shop, and relatively frequent and regular bus services. 	
Accessibility	<p>This option would help provide development that has a good range of accessible jobs, services and shops for future residents. Providing equality of access is essential as part of intra-generational sustainable development. It is important therefore, to ensure that those who cannot or choose not to drive a car are not put at an unfair disadvantage in terms of getting to work, essential shops or community services. For this reason a focus on development in or adjacent to main towns, is likely to be preferable for achieving sustainable access.</p> <p>New housing development would need to be matched with new employment development. This would help encourage a greater level of live-work self-containment. However, the characteristics of jobs and resident workforce in Monmouthshire will always mean that self-containment is a difficult objective to achieve. Mixed use development sites in Monmouth and Chepstow may encourage release of good quality employment land, which could be good locations for hi-tech businesses or offices.</p> <p>Development of new housing in Magor/Undy will need to be delivered in conjunction with new community service infrastructure. Without this infrastructure access from new housing to services will be highly reliant on car use and incompatible with sustainable distribution of development. Developer s106 contributions could be used to deliver new community services if development was directed to these areas.</p> <p>Some settlements will see lower growth and this may see no low or no new</p>

	<p>allocations of land, such as in Raglan, Penperlleni and Rogiet/Sudbrook (there is a planned reduction in the proportion of development there). These settlements are characterised by having low-levels of self-containment and therefore making sure these towns/villages are not the focus of new growth is compatible helping to make sure new development has good access to jobs and services.</p> <p>In the rural areas new housing must be located in villages that have a good range of everyday services on offer. Services should include primary schools, a food shop, as well as regular and frequent public transport connections to nearby towns.</p>
Housing	<p>This option would help provide affordable homes in accessible locations for residents of the main towns as well as the rural areas. However, to avoid adverse impacts from new housing in rural areas a large percentage of this will need to be provided as affordable.</p>
Community	<p>Especially under high growth approaches, this option could see changes to the character of the towns, with an increased population resulting in some change of character. However, these towns would be most able to accommodate this growth given their current size.</p> <p>New development could deliver developer contributions that could help bring new or improved community facilities to the towns. There will also be the need to have strategies in place to ensure there is the necessary capacity in community services and facilities in these towns to accommodate growth, to include schools and health services. New development could also help to support a critical population necessary to support local businesses and shops.</p> <p>New development in Magor/Undy will need to be supported by community facilities. There is the risk that more development in this location could contribute to the characteristics of the area as a commuter or 'dormitory' town, with little defining character and community identity.</p> <p>Smaller settlements are to receive a proportionally less amount of development, therefore protecting these communities from change.</p> <p>It will be important to make sure new development in rural areas is of a scale that will not adversely impact on these areas, but will help support local housing needs to maintain these areas as functional communities with a demographic mix and vibrant local services.</p> <p>To avoid adverse community impacts in all settlements, both rural and urban, development should only be given planning permission where there is existing or planned additional capacity in public services, such as schools and health services.</p> <p>All extensions to existing towns and villages will need to be designed so they promote linking of existing and new communities. This is in terms of physical access through roads and footpaths and also sharing use of facilities. The intention will be to create a continuum between residential areas promoting</p>

	<p>cohesion.</p>
<p>Biodiversity, landscape and land/soil</p>	<p>All of the named growth towns have environmental constraints to their development. Therefore, their growth risks adverse impacts to biodiversity and the landscape. A large proportion of development would have to be located on greenfield land, given the lack of previously developed land in any one of these towns.</p> <p>The majority of space for new homes, which are not already committed for development, will be on greenfield urban extensions to the towns (four of the five strategic sites). Therefore, there will be land requirements and a loss of soil. The allocation of sites can aim to reduce the impact of these by choosing less sensitive sites and other policies on density can help make sure land is used efficiently.</p> <p>Monmouthshire has some landscapes of very high quality that need to be a consideration of new development. For instance the very high quality landscapes around Abergavenny are characterised by high quality landscapes as the town borders on the National Park, and some sites around Monmouth are high quality due to location adjacent to the Wye Valley AONB.</p> <p>Each allocation will also need individual ecological investigation. This will be to assess suitability for development. Assessment needs to be undertaken at a suitable level of detail to identify areas that will need protection and develop policy criteria for site delivery to avoid and mitigate potential harm.</p>
<p>Built environment and historic heritage</p>	<p>High growth options may result in large changes to the built form and character of the towns that are the focus of growth. This includes the historic form of the towns and views out to the surrounding hills. However, it may be possible to avoid significant impacts through good quality design and urban layouts that respect existing important views and protected ridgelines. New development must be designed and delivered to take into account principles of high quality and complement and enhance the existing urban area.</p> <p>Site survey and implementation of suitable control measures should help avoid any impacts to historic heritage.</p>
<p>Air</p>	<p>These impacts relate closely to the impacts identified under accessibility. It is likely that this option would help put the majority of housing in towns where there is already good access to shops, services and jobs, promoting greater self-containment. This could help to reduce car use from new development, as people would not have to travel far to meet their day-to-day needs. To help achieve this it would be necessary to link new housing with the provision of high quality employment land, in order to help stimulate the delivery of new jobs over the plan period.</p> <p>The aim is to help deliver development that would contribute to (rather than detract from) the aim of greater self-containment in terms of jobs, homes and services. The three towns of Abergavenny, Monmouth and Chepstow already have the highest levels of self-containment for work. With up to 70% of people in Monmouth living and working in the town and 55% for Abergavenny. This is reflected in figures for distance travelled to work, with</p>

	<p>around 50% of Abergavenny and Monmouth employees travelling under 5km to work (slightly lower for Chepstow) (NB figures are from 2001 census therefore more recent changes will not be reflected). If development of new housing and employment proceeds in keeping with existing trends this could help limit the need to travel and continue to achieve more self-containment.</p> <p>Commuting out of Wales and to other authorities in Wales is inevitable for Monmouthshire, very high levels of self-containment is an unrealistic goal due to the characteristics of jobs and resident workforce. Chepstow, Caldicot and Abergavenny have train stations, therefore commuting from these towns can be made by this more sustainable mode of transport – with lower air quality impacts. Therefore, this option could help to reduce car travel and therefore air quality impacts. Additional, growth at Magor/Undy (as well as other locations with poor access to public transport but good access to highways) is likely to give rise to an increase in car travel – with adverse air quality impacts. If new community facilities are provided in Magor/Undy this could help reduce car reliance to access everyday services.</p> <p>In rural areas housing should be provided primarily for affordable housing needs. However there will be an inevitable impact of these new homes, creating additional car travel.</p> <p>Avoiding development in the open countryside is appropriate to avoid creating patterns of development that result in unsustainable travel patterns.</p> <p>Overall, better public transport provision, safe and direct walking and cycling routes, and provision of local services will all help the objective of reducing car travel and associated air quality impacts.</p>
Water quality and supply	<p>In areas that are the focus of large amounts of new development, such as the four towns, assessment may be needed to ensure that there is sufficient water supply and waste water infrastructure in place to accommodate growth. Assessment needs to consider the impacts of cumulative harm. This is particularly important given the need to protect internationally designated nature conservation sites on the Rivers Usk and Wye from harm. All new development will have to ensure that water efficiency measures are put in place to reduce overall water demand.</p>
Flood	<p>All three of these towns are affected by flood risk. This may constrain the developable areas within and around the towns. However, so long as the tests set out in TAN15 are followed, and it can be shown that no vulnerable development is located in flood prone areas and other development in these locations is achieving other sustainability benefits, it may still be the most suitable location for development.</p> <p>Sustainable drainage techniques will need to be applied on all development sites to avoid the risk of exacerbating risks of flood off-site.</p>
Energy	<p>This option is likely to include large new development sites. The development of larger urban extensions presents invaluable opportunities for the delivery of low carbon heat and power, as part of district or community heat and power schemes. It is likely to be more financially viable to integrate</p>

	<p>these types of technology into larger developments to be delivered by a single developer, rather than in multiple smaller schemes. Schemes could also be used as national examples of best practice.</p> <p>It may be possible to set specific policy for higher targets to be met on strategic sites. Therefore, the large development sites at Monmouth, Abergavenny, Chepstow, Magor/Undy and Caldicot should all consider potential for on-site low carbon heat and power generation.</p> <p>Wind energy potential either as national grid schemes or to meet needs on specific sites should not be ruled out at this stage.</p> <p>New development will use energy in construction and operation, and therefore sustainable construction principles and low carbon energy generation policies will be needed to reduce overall carbon emissions from energy use.</p>
Economy	<p>This approach will help support the economy of the main towns by providing a workforce for existing, expanding and new employment in the towns. However, Chepstow, Magor/Undy and Monmouth are located in close proximity to other towns and cities with strong economies and therefore new homes in these locations may not necessarily help the local economy.</p> <p>It is clear the relationship of employment availability to housing is not always straightforward in Monmouthshire, with high levels of commuting in and out for work. However, where more employment is located near where people live it will at least help support aims of greater self-containment and patterns of development that may in the future reduce commuting.</p> <p>This option may also help support rural enterprise and business through providing housing to meet the needs of the rural workforce. If new affordable housing is not provided in these areas it is likely the resulting change in demographics of these villages will mean there is only a very limited rural workforce.</p> <p>Housing growth will be an essential part of encouraging economic growth in the area, with a local and suitably mixed workforce an essential part of supporting new business.</p>

Appendix 4

Sustainability appraisal matrices of the strategic policies

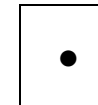
This appendix contains the sustainability appraisal matrices for the policies of the Monmouthshire Local Development Plan Deposit (June 2011). The appraisal includes all the policies of this version of the Local Development Plan (LDP) .

The matrices include:

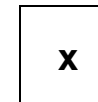
- a comment interpreting the purpose of the policy for the appraisal
- a simple symbol summary of each policy's performance against the sustainability objectives
- a comment on how effective the policy will be in achieving more sustainable development
- recommendations on how the policy could be improved to deliver sustainable development and avoid adverse impacts.

Key to appraisal symbols

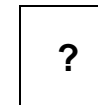
Likely to contribute to the achievement of greater sustainability according to the identified objective



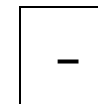
Likely to hinder the achievement of greater sustainability according to the identified objective



Likely effect but too unpredictable to specify, or multiple impacts which are potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



Policy S1 – The spatial distribution of new housing development		
This policy sets the overall approach to development in Monmouthshire, listing the towns and villages that will be the focus of development and the areas where development will be strongly controlled.		
Objective		Comment
Access to services	●	This approach should aid access to services by focusing growth on those areas that already have a good level of services, including schools, shops and community facilities. To aid this development it will be necessary to combine the distribution of development with other ways of improving access, such as new facilities and improved public transport, walking and cycling routes.
Housing	●	This policy relates to the delivery of housing as part of development, and should aid its delivery. The policy also proposes new housing in rural parts of the County to meet local housing needs. This will be supported by affordable housing policy.
Health and wellbeing	?	Better access to services could help protect the wellbeing of residents.
Community	?	This policy should help in supporting local communities, by providing new development in locations that will help allow for the natural growth of towns and villages. In some areas, depending on the level of growth, there could be changes to community character. These could be positive in terms of helping create more community focus and local life, and negative if development is at a scale that changes the character of the area or reinforces the poor community character of commuter settlements.
Biodiversity	?	The level of growth proposed has the potential to have negative impacts on biodiversity, and will need to be controlled through appropriate policy and site allocation.
Landscape character	?	The level of growth proposed has the potential to have negative impacts on landscape character, and will need to be controlled through appropriate policy and site allocation.
Built environment	?	The level of growth proposed has the potential to have negative impacts on the built environment and policies will need to be in place to make sure new development is delivered according to high quality principles, both in the design of individual buildings and the urban layout.
Historic heritage	?	The level of growth proposed has the potential to have impacts on historic heritage, and will need to be controlled through appropriate policy and site allocation.

Air	?	It is hoped that this spatial distribution could help lead to greater self-containment of some of the towns and larger villages of Monmouthshire, in particular the links between jobs and homes. Some towns have greater potential for self-containment, such as Abergavenny and Monmouth. In others there will need to be careful controls to avoid development simply exacerbating current commuting patterns, most notably in the 'Sevenside' area including Magor/Undy and Caldicot/Portskewett, as well as the rural villages of Raglan and Penperlleni. Avoiding development in the open countryside is appropriate to avoid creating patterns of development that result in unsustainable travel patterns.
Water quality	?	There is the potential for development to have impacts on this objective, this will depend on the location of allocated sites, and the provision of suitable infrastructure to avoid impacts.
Water supply	?	There is the potential for development to have negative impacts on this objective, however, provision of suitable infrastructure and sustainable construction should help reduce impacts.
Flood	?	There is the potential for development to have negative impacts on this objective, this will depend on the location of allocated sites, and the provision of suitable infrastructure to avoid impacts.
Minerals and waste	?	New development will require the use of resources, and therefore sustainable construction principles will need to be put in place to help reduce use/waste of primary materials.
Land and soil	×	Development will inevitably require land take, policies need to be implemented that seek to make sure land is used as efficiently as possible, including density standards and prioritisation of previously developed sites.
Energy	?	New development will use energy in construction and operation, and therefore sustainable construction principles and low carbon energy generation policies will be needed to reduce overall carbon emissions from energy use.
Employment	-	No direct relationship
Wealth creation	?	New housing can help support the local economy, providing a mixed workforce to meet the demands of local businesses.
Climate change	●	If it is acknowledged that there is a requirement for new development to meet the needs of residents and businesses then overall the LDP strategic policy should help make sure development will mitigate climate change. Other policies will be necessary to make sure new development is adaptable to a changing climate, such as in design and avoiding flood risk areas.
Sustainability summary and significant impacts		

One of the principle roles of a spatial strategy is to deliver more sustainable development reducing reliance on car travel. This can be done through policies which support public transport improvements and walking and cycling routes. However, more important than this a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place. This includes frequency and number of trips and access from homes to jobs, schools, shops, health services and other community facilities.

This policy sets out the strategic distribution of housing development in Monmouthshire. Housing will be focused in towns and larger villages this may help create more self-containment in terms of jobs and homes. However, the housing distribution is not directly linked to the location of existing and future employment, with the Severnside area still remaining the focus of much economic growth. The SA recognises there is the risk that focusing housing growth in the Severnside area has the risk of exacerbating current commuting patterns, and therefore the need to make sure new housing is linked to new jobs and other service provision.

New affordable housing in the villages and towns could also help more people who currently work in the County, live there also.

Recommendations including mitigation

- In addition to spatial distribution, improving access will be reliant on delivering other improvements to the plan area, such as supporting public transport, walking and cycling and provision of new facilities and employment
- There may be impacts on the natural and built environment of delivering development growth, therefore development management policies to protect locally and nationally important assets will be essential, as will the allocation of suitable sites
- Affordable housing policy will be needed to help make sure housing delivery is helping meet local needs
- There is a need to help increase the overall self-containment of settlements to reduce the very high levels of commuting currently experienced in Monmouthshire. This will include the need to match new housing provision in some areas with employment provision, this is of particular importance in the 'Severnside' towns and villages some of which have little community character and could be described as 'commuter' or 'dormitory' settlements.
- Avoiding some types of impact, such as water quality and supply, will depend on the identification and delivery of suitable infrastructure prior to development.
- To reduce the overall impacts of delivering this level of development it may be suitable to have policies in place to help deliver sustainable construction and reduce resource use.
- To reduce the impacts of land requirements for this type of development there may need to be policies in place to make efficient use of land, including density standards and prioritisation of previously developed land where suitable.

Audit trail

This policy has been updated from that of the Preferred Strategy. The strategy now is clear that the main focus of housing development will be in the larger settlements with better services at Abergavenny, Chepstow and Monmouth. The less sustainable settlements such as Magor/Undy will receive a smaller amount of development. This clarification helps demonstrate a strategy that is seeking greater self-containment of towns.

The policy now separates out those rural villages where land is allocated for development, it is only within these areas that development will be permitted. A limited amount of development may be permitted in a final tier of Minor villages subject to other policy controls. This is permissive of

new housing development in even the smallest villages, this does not have to be for affordable needs. This is commented on further in the SA of policy H3.

Policy S2 – Housing provision

Closely related to policy is S1, this policy on the spatial strategy, sets out the actual quantity of housing that will be directed to each of the main settlements listed and a total figure for the rural area. The policy shows the quantity of development that would come from new allocations, has already been built in the plan period, sites with planning permission and identified urban housing potential figures. There are allocations for 1710 new homes as part of a growth of an anticipated total of 4027 new homes.

Objective		Comment
Access to services	●	This distribution of housing should help to provide new homes in locations that have good access to services. This includes towns such as Abergavenny and Monmouth where there is already a good level of services. These settlements are to receive around 55% of all new allocations, focusing development in these locations. For some other towns there may be more limited improvements to access to services, such as Magor/Undy and Caldicot where service provision may be lower than would be expected for settlements of this size. To achieve this objective successfully it would be necessary to deliver this policy in line with other improvements to access and service delivery. There is a planned decrease in the proportion of housing in rural areas, helping to limit growth in these less sustainable locations.
Housing	●	This policy specifically relates to housing delivery and should help meet this objective – supported by policies on affordable housing to help meet local needs.
Health and wellbeing	●	Good quality homes are an essential part of helping maintain health and wellbeing.
Community	●	New housing should help support the communities in Monmouthshire. The focus of new homes in the larger settlements of the County should be able to accommodate new residents into these towns with little impact. Smaller settlements are to receive a proportionally lesser amount of development, therefore protecting these communities from change. It will be important to make sure new development in rural areas is of a scale that will not adversely impact on these areas, but will help support local housing needs to maintain these areas as functional communities with local services. The settlement studies have helped in identifying suitable growth in rural villages and Policy S4 makes clear affordable housing provision must be provided.
Biodiversity	?	The level of growth proposed has the potential to have negative impacts on biodiversity, and will need to be controlled

		through appropriate policy and site allocation. Of particular concern may be the impacts of the quantity of growth on water resources, with knock-on effects on the river water quality of the Wye and the Usk internationally designated sites. However, the Habitats Regulations Assessment demonstrates that impacts can be mitigated for.
Landscape character	?	The level of growth proposed has the potential to have negative impacts on landscape character, and will need to be controlled through appropriate policy and site allocation.
Built environment	?	The level of growth proposed has the potential to have negative impacts on the built environment and policies will need to be in place to make sure new development is delivered according to high quality principles, both in the design of individual buildings and the urban layout.
Historic heritage	?	The level of growth proposed has the potential to have impacts on historic heritage, and will need to be controlled through appropriate policy and site allocation.
Air	?	<p>It is hoped that this spatial distribution could help lead to greater self-containment of some of the towns and larger villages of Monmouthshire, in particular the links between jobs and homes. Some towns have greater potential for self-containment, such as Abergavenny and Monmouth. In others there will need to be careful controls to avoid development simply exacerbating current commuting patterns, most notably in the 'Severnside' area including Magor/Undy and Caldicot/Portskewett, as well as the rural villages of Raglan and Penperlleni. There is a planned increase in the proportion of dwellings in these locations.</p> <p>Avoiding development in the open countryside is appropriate to avoid creating patterns of development that result in unsustainable travel patterns.</p>
Water quality	?	There is the potential for development to have impacts on this objective, this will depend on the location of allocated sites, and the provision of suitable infrastructure to avoid impacts.
Water supply	?	There is the potential for development to have negative impacts on this objective. However, provision of suitable infrastructure and sustainable construction should help reduce impacts.
Flood	?	There is the potential for development to have negative impacts on this objective, this will depend on the location of allocated sites, and the provision of suitable infrastructure to avoid impacts.
Minerals and waste	?	New development will require the use of resources, and therefore sustainable construction principles will need to be put in place to help reduce use/waste of primary materials.
Land and soil	?	The policy shows that allocations will provide around 1710 new homes in the plan area. Many of these will need to be

		on greenfield sites due to the limited previously developed land availability in the County. Therefore, there will be land requirements and a loss of soil. The allocation of sites can aim to reduce the impact of these and other policies on density can help make sure land is used efficiently.
Energy	?	New development will use energy in construction and operation, and therefore sustainable construction principles and low carbon energy generation policies will be needed to reduce overall carbon emissions from energy use.
Employment	?	Providing new homes in areas with good access to existing jobs can help meet this objective. However, in some locations new employment will be needed to support new housing growth.
Wealth creation	●	New housing can help support economic growth by providing a suitability skilled workforce.
Climate change	?	This policy should help in the sustainability objectives of improving access and reducing the need to travel, making some contribution mitigating against climate change. Other policies will be necessary to make sure new development is adaptable to a changing climate, such as in design and avoiding flood risk areas.

Sustainability summary and significant impacts

The table that follows the housing distribution of policy S2 gives a good indication of how the proposed allocation of new housing development will change the overall proportion of homes in each of the named towns and villages, and the rural area. This indicates that Abergavenny, Chepstow and Monmouth will be the focus of a large amount of development that will raise their proportional share of dwellings. However, by 2021 the proportional share of dwellings in these main towns will have risen by under 0.2%. Other towns/villages will also see growth and this could be to a greater extent. For example the 'Severnside' settlements are set to grow by 0.61%. This may create less sustainable patterns of development, with these settlements having fewer of the services to support growing populations.

However, a large proportion of this growth is inevitable. The growth figures are from all sources, including land already committed for housing and land and existing capacity in the urban area. The LDP actually places the largest *new* allocations in the main towns.

The SA supports this distribution, where it will help to create more self-contained towns (based on existing self-containment levels) and this includes in Abergavenny and Monmouth. In other towns the new housing development will need to be delivered in line with employment growth to avoid exacerbating unsustainable commuting patterns, this includes Portskewett and Magor/Undy.

By 2021 it is anticipated that a lower proportion of dwellings (-0.96%) will be in the rural area, this will support the aim of reducing the need to travel by focussing development on those areas with more local services and jobs.

For Magor/Undy new development is proposed (around 260 new homes) and despite this being an area with poor self-containment new homes may help secure delivery of new community facilities and infrastructure in these areas, supporting the development of more accessible local services in

the area.

Some settlements will see lower growth and this may see low or no new allocations of land, such as in Raglan, Penperlleni and Rogiet/Sudbrook (there is a planned reduction in the proportion of development there). These settlements are characterised by having low-levels of self-containment and therefore making sure these towns/villages are not the focus of new growth is compatible with helping create more sustainable patterns of development.

The space for expansion may have been limited in some instances by the quality of the natural environment, or other constraints such as flood risk.

Recommendations including mitigation

- In addition to spatial distribution improving access will be reliant on delivering other improvements to the plan area, such as supporting public transport, walking and cycling and provision of new facilities and employment
- There may be impacts on the natural and built environmental of delivering development growth, therefore development management policies to protect locally and nationally important assets will be essential, as will the allocation suitable sites
- Affordable housing policy will be needed to help make sure housing delivery is helping meet local needs
- There is a need to help increase the overall self-containment of settlements to reduce the very high levels of commuting currently experienced in Monmouthshire. This will include the need to match new housing provision in some areas with employment provision, this is of particular importance in the 'Severnside' towns and villages some of which have little community character and could be described as 'commuter' or 'dormitory' settlements.
- Avoiding some types of impact, such as water quality and supply, will depend on the identification and delivery of suitable infrastructure prior to development.
- To reduce the overall impacts of delivering this level of development it may be suitable to have policies in place to help deliver sustainable construction and reduce resource use.
- To reduce the impacts of land requirements for this type of development other policies need to be implemented on the efficient use of land, including density standards and prioritisation of previously developed land.

Audit trail

The policy has been revised to take into account the time past between the Preferred Strategy and Deposit LDP. New figures on completions are given. The way the settlements are referred to has also changed, to reflect policy S1, more are now referred to singly rather than as groups. This makes it clearer where development is directed.

The revision of the policy tiers in S1 is also reflected in S2. This provides a clearly picture of the roles of different settlements in the hierarchy and the levels of growth they will receive.

The sustainability implications of the changes are limited as the majority of figures for new allocations remain the same. However, there have been an increase for the 'Rural Secondary Settlement' of Penperlleni.

Policy S3 – Strategic housing sites

The policy sets out the strategic sites where development will be located in three of the main towns and two 'Sevenside' settlements. It is intended that these sites will accommodate the majority of housing development that is identified as in need of allocation in policy S2. The policy contains a requirement for a site masterplan and feasibility study for low carbon and renewable energy generation. The policy is supported by more detailed site specific policies in the 'site allocations' section of the LDP.

Objective		Comment
Access to services	?	<p>Generally, these sites will be parts of towns and villages that have quite good access to services. However, the exact impacts will vary for each of the extensions.</p> <p>Abergavenny: The site is to the north of the town, adjacent to Mardy. Therefore, the site has good access to Abergavenny town centre but it is unlikely to be within walking distance (2km straight-line distance to the town centre). Development in this location would need to be supported by good public transport and cycling routes to help reduce car use.</p> <p>Chepstow: This site is in the town centre and should have good access to services, although suitable rail crossings and/or underpasses will be needed to help people directly access the town centre and reduce physical separation.</p> <p>Caldicot/Portskewett: This site around 1.2km straight-line distance from Caldicot town centre, although there are some local shops nearby. The railway station is over 2km from this site, therefore to help manage the high level of car commuting from this part of the Monmouthshire there will need to be high quality links to the station.</p> <p>Magor/Undy: There are services in the settlement but not perhaps of a scale needed to serve the local population, and these are around 1km from the site. There is the risk that new houses in this location may have poor access to a range</p>

		<p>of everyday services.</p> <p>Monmouth: This site is 1.5km straight-line distance from Monmouth town centre and therefore there is quite good access to services but these may be beyond walking distance for many people.</p> <p>Site masterplans will need to show how accessibility and non-car movement has been prioritised in the layout of residential neighbourhoods.</p>
Housing	●	By allocating strategic housing sites it should help to make sure that housing is delivered.
Health and wellbeing	?	Providing new homes to meet people's needs should aid in maintain health and wellbeing of residents. Access to open space and health services will also be an important component of this, and will need to be considered as part of site proposals. Site masterplans will need to include open space provision and an urban layout that will help contribute to more healthy lifestyles and promote wellbeing.
Community	?	It is unlikely that this level of housing in any of these settlements will impact on community character. In Magor/Undy it will be important to consider ways in which new housing development can help in providing new community facilities for residents, including shops, to support the area in creating a unique identity. Site masterplans will need to show how the urban layout and mix of uses will help support sustainable communities.
Biodiversity	?	<p>The impacts of development of these sites, the majority of which are greenfield, will have impacts on biodiversity. There are many protected areas in Monmouthshire and it is essential that new housing development does not adversely impact on their integrity.</p> <p>The sites in Caldicot/Portskewett and Magor/Undy are approximately 1.5km from the Severn Estuary Special Protection Area and Ramsar site designated as being of international importance, and are also closer to the Gwent Levels SSSI that supports these international sites.</p> <p>Monmouth is on the Wye Valley Special Area of Conservation, an internationally designated nature conservation site. However, it is around 1.4km from the Wye Valley and subject to proper sewerage infrastructure and storm run-off systems being in place should not directly adversely impact on it.</p> <p>The site in Abergavenny/Mardy is just outside the Brecon Beacons National Park and only around 0.6km from the Sugar Loaf Woodlands Special Area of Conservation, and this will need to be a consideration of development.</p> <p>The site in Chepstow borders the Wye Valley Special Area of Conservation, to avoid impact on this internationally designated site it will be essential to develop the site in a way that full takes into account the setting and risks of harm to</p>

		<p>the site. An 'appropriate assessment' under the Habitats Regulations may be required.</p> <p>Where biodiversity enhancement and conservation will be part of development this should be shown in site masterplan.</p>
Landscape character	?	<p>Monmouthshire has some landscapes of very high quality. There are sites where there may need to be particular attention to the design and form of development to avoid visual impacts from surrounding designated landscapes including in Abergavenny, as the site borders on the National Park and Monmouth that is adjacent to the Wye Valley AONB. Landscape protection and enhancement feature of development need to be shown in a site masterplan.</p>
Built environment	?	<p>These new allocations are quite substantial blocks of development, and will therefore need to be designed to very high quality standards to avoid the adverse impacts caused some post-war development. This includes impacts of urban form and good access and movement routes and the design of individual buildings. Site masterplans should show how built environment design and urban form elements contribute to the quality of development.</p>
Historic heritage	?	<p>Most of the proposed development is outside the town and impacts on built historic heritage are unlikely. However, there will be a need to make sure new development properly takes into account potential impacts on the buried heritage and other heritage features, including in the landscape.</p>
Air	?	<p>Most of these sites are relatively accessible and therefore are more suitable locations for growth than those that have poor access to essential services. The lack of employment and current character of some towns as 'commuter towns' may mean that development will increase car travel, and therefore have adverse air quality impacts.</p>
Water quality	?	<p>The site in Chepstow is immediately adjacent to the Wye and therefore there is the risk of water quality impacts. In addition, all new development has the potential to adversely impact water quality if there is inappropriate waste water treatment or surface water run-off infrastructure in place. Therefore, new development will need to be planned and phased in to make sure there is sufficient capacity to handle waste water and avoid adverse impacts.</p>
Water supply	?	<p>There will be inevitable impacts of this level of development on the demand for water. However, provision of suitable infrastructure and sustainable construction should help reduce impacts.</p>
Flood	?	<p>Parts of Monmouthshire are at risk of flood, a flood consequence assessment is being prepared and this will help show in more detail the flood risk areas and suitability for development. Flood maps indicate that:</p> <p>Abergavenny: The selected site is at no particular risk of flood.</p> <p>Chepstow: The selected strategic site may have some risk of flooding, and this will need to be considered in proposals for development.</p>

		<p>Monmouth: The selected strategic site may have some risk of flooding, and this will need to be considered in proposals for development.</p> <p>Caldicot/Portskewett: The selected site is at no particular risk of flood.</p> <p>Magor/Undy: The selected site is at no particular risk of flood.</p> <p>For all sites at risk of flood the Council will also need to show that there are no suitable alternatives, and that a proper sequential approach is followed in site selection. All sites will also need to include suitable surface water drainage to avoid increasing the risk of flood on-site or elsewhere.</p>
Minerals and waste	?	New development will require the use of resources, and therefore sustainable construction principles will need to be put in place to help reduce use/waste of primary materials.
Land and soil	?	There are a lack of previously developed sites in Monmouthshire to accommodate all new growth and therefore green field land is required. Four of the five strategic sites are on green land.
Energy	?	New development will use energy in construction and operation, and therefore sustainable construction principles and low carbon energy generation policies will be needed to reduce overall carbon emissions from energy use. The policy sets a requirement for all these sites to be assessed for the feasibility of incorporating low carbon or renewable energy regeneration on site.
Employment	?	Each of the towns/villages has a different level of existing employment and therefore some strategic sites may have better employment access than others. For instance, Chepstow has good employment as does Abergavenny, but Magor/Undy has very poor employment and already has characteristics of a 'commuter town'. It is clear the relationship of employment availability to housing is not always straightforward in Monmouthshire, with high levels of commuting in and out for work. However, where more employment is located near where people live it will at least help support greater self-containment and patterns of development that may in the future reduce commuting.
Wealth creation	?	Some of the housing sites were previously allocated for employment. Re-allocation of this land for housing may mean some loss in the choice of employment sites. However as employment development was never forthcoming it is likely that the sites were not suitable to business needs. Policy supporting text anticipates that some new housing could help in the delivery of employment and this could have a positive impact against this objective.
Climate change	?	The impacts on climate change of this policy come from how easy it will be for new residents to access services and jobs without using a car, therefore reducing air quality impacts. As the appraisal shows many of these strategic sites could help reduce car travel, although to achieve this there will have to be high quality alternative in place. Where there is

	<p>currently a lack of jobs and a high level of commuting, such as Magor/Undy and Caldicot there is the possibility that these new homes could increase car travel.</p> <p>Flooding will need to be taken into account to reduce risk of new residents to a changing climate.</p> <p>Requirements for energy feasibility statements should help make sure new development reduces its proportional carbon dioxide emissions.</p>
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Sustainability summary and significant impacts

The SA of this policy considers the strategic implications of the allocation of these sites, and it is up to the Council to undertake a more detailed assessment of the suitability of sites.

Development management policies set detailed criteria for the delivery of these sites and are appraised separately. The policy should help make sure that the sites are developed in a way that helps minimise adverse environmental, social and economic impacts and uses development to secure benefits. This includes the need to use housing to help deliver employment infrastructure, to stimulate job growth and therefore help in the aim of greater self-containment and fewer and shorter trips by car.

Where these sites are brownfield there may be less of an impact, and potential for improvements, subject to suitable control of development. For other sites, currently greenfield, there may be new impacts relating to the loss of land. All sites where a risk is identified in the HRA should include site specific appropriate assessment as part of development proposals.

The policy requires that proposals for the development of strategic sites includes a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to be met on site. Where feasibility studies are relied on the Council will need to ensure evidence to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

Recommendations including mitigation

- All new development will need to have associated public transport improvements/extensions to make sure it is support with high quality new public transport routes, linking to the town centre and stations where possible. New safe cycling routes should also be part of a strategy to reduce car reliance.
- Site masterplans will help make sure sustainability benefits are maximised, including details of necessary improvements to access, sustainable construction, employment provision etc.
- Phasing new development with infrastructure delivery, both social and utility, to avoid adverse impacts on the environment and to help in creating new communities.
- Site at risk of flood will need to be developed following Environment Agency advice, including sustainable drainage systems and flood protection

measures where necessary.

- The findings of the Habitats Regulations Assessment will need to be taken into account in deliver of these sites. It may be that further detailed work is needed for the sites in close proximity to internationally designated sites including site specific ‘appropriate assessment’.
- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. Planning officers will need to have the tools and expertise to assess if the feasibility statements are valid and that no more can be done to achieve greater carbon savings. The Council may need to prepare SPG or other guidance on achieving low carbon development.

Audit trail

This policy and SA is largely unchanged from the Preferred Strategy version.

Policy S4 – Affordable housing provision

This policy sets out the total quantity and the proportion of new housing sites that will need to be for affordable housing.

Objective		Comment
Access to services	?	It is likely that this policy will generally aid access to services by supporting viability of rural communities to support local services.
Housing	●	This policy directly relates to delivering homes for all through affordable housing. The policy could include details of the proportion that should be socially rented, as this will be the most affordable type of homes and most easy to secure for affordability in perpetuity.
Health and wellbeing	●	Providing everyone with a good quality home should help support wellbeing.
Community	●	Providing for affordable housing should help support more socially and demographically mixed communities that can benefit community character, this is particularly important in the rural areas that are becoming characterised by an aging local population, commuters, second home owners and retirees. The policy would require almost 60% of new affordable housing in rural areas, helping to support diverse rural populations and a rural workforce, all of which are beneficial to creating rural communities.
Biodiversity	-	No direct relationship.
Landscape	-	No direct relationship.

character		
Built environment	?	It will be important that affordable housing is built to a high quality standards comparable (or better than) market housing.
Historic heritage	-	No direct relationship.
Air	?	More affordable housing has the potential to support aims to reduce the need and distance of car commuting. Currently many people travel into Monmouthshire for work, one of the causes of which the high price of housing pushing people out of the County. Therefore, new affordable homes will mean more people can live <i>and work</i> in Monmouthshire.
Water quality	-	No direct relationship.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.
Minerals and waste	-	No direct relationship.
Land and soil	-	No direct relationship.
Energy	-	No direct relationship.
Employment	●	It is likely that new affordable housing will help people live near they work, particularly in those areas that already have good access to jobs, such as Abergavenny, Monmouth and Chepstow.
Wealth creation	?	A better mix of workforce, supported by more affordable housing, could help support businesses growth.
Climate change	●	Impacts are likely to predominantly positive, through reducing the need to travel

Sustainability summary and significant impacts

This is policy is well evidenced and this should help secure the provision of housing to meet needs.

Provision of affordable homes can have a variety of positive impacts on sustainable development in Monmouthshire. Affordable homes will:

- supporting socially and demographically mixed communities
- help young people and families remain in the County
- help make sure people can live near to where they work reducing commuting with benefits related to reduced car use.

The policy sets quite ambitious targets for delivering affordable housing. In rural areas sites will have to deliver up to 75% affordable housing. This should help allow the delivery of rural homes to meet affordable needs without overly restricting the market. In terms of sustainability affordable

housing in the rural areas could help to support communities, but overall levels of housing need to be kept within the quantities set out in the strategy to avoid creating unsustainable patterns of development that lead to access issues and encourage car travel.

Often affordable housing has to be built to higher sustainability standards than market housing to access support funding, therefore it may be better in terms of energy efficiency and material use.

Recommendations including mitigation

- An affordable housing Supplementary Planning Guidance could help provide details of implementation. This should include mix of affordable housing types, evidence to be provided by developers on financial viability, how commuted contributions will be handled and requirements for mixed market and affordable developments. This additional information will be essential in helping to deliver the policy.

Audit trail

The policy has changed since the Preferred Strategy version. The policy now sets different proportions of affordable housing in the ‘Sevenside’ settlements (now 25% was 35%). The character of this area may make housing here more affordable than elsewhere in the plan area in any case. The policy also has lowered requirements for affordable housing *in* the Main and Minor villages and *outside* there villages. This revision may help stimulate developers to build in these locations while still providing some affordable housing, previous policy may have meant that no or very little housing would be developed in these areas. Conversions in the open countryside now have a 35% target for affordable housing, relatively low compared to village requirements, although perhaps realistic to ensure the reuse of good quality rural buildings.

Policy S5 – Community and Recreation Facilities

This is a brief policy simply stating that community and recreation facilities will be permitted in and adjoining towns and villages, existing facilities must be protected.

Objective		Comment
Access to services	●	It is likely that this policy will generally aid access to services by helping create and retain existing facilities.
Housing	-	No direct relationship.
Health and wellbeing	●	Providing community and recreation facilities can help support healthy lifestyles and provision of community spaces can help support wellbeing.
Community	●	Providing community and recreation facilities can help in creating community cohesion and provide spaces for people to meet.
Biodiversity	?	New peripheral development will need to ensure adverse biodiversity impacts are avoided.

Landscape character	?	New peripheral development will need to ensure adverse landscape impacts are avoided.
Built environment	?	All new development will need to be of good built quality to avoid adverse impacts.
Historic heritage	?	All new development will need to take into account impacts on historic heritage.
Air	?	Retaining accessibility facilities and providing new ones may help reduce people's need to travel.
Water quality	-	No direct relationship.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.
Minerals and waste	-	No direct relationship.
Land and soil	?	New peripheral development will need to ensure adverse impacts on high quality soils are avoided.
Energy	-	No direct relationship.
Employment	-	No direct relationship.
Wealth creation	?	Having a good stock of recreation and community facilities can improve the attractiveness of an area to investors.
Climate change	-	No direct relationship.

Sustainability summary and significant impacts

This policy is not very strategic in nature and other policies of the plan provide more detail on this type of scheme.

It is difficult to determine the exact implications for sustainable development of these policy as this may depend on how it is implemented. However, retaining and providing new community and recreation facilities will be an important part of meeting sustainability objectives relating to community and supporting healthy lifestyles.

Recommendations including mitigation

- Recommendations of the supporting text related to accessibility must be implemented for all sites.

Audit trail

This is a new policy.

Policy S6 – Retail hierarchy

This policy sets a hierarchy of retail centres in Monmouthshire.		
Objective		Comment
Access to services	●	Providing shopping, especially for everyday goods and services, in town centres should help improve the accessibility of these services for all as these locations are likely to be easiest to get to by car alternatives. The policy should be clear that the hierarchy relates the scale and type of retail development that would be permitted in each location. The policy could state that out-of-town retailing would not be permitted.
Housing	-	No direct relationship.
Health and wellbeing	?	Local food shops are part of providing for a healthy population.
Community	?	Local and villages shops can often provide a focus for the community and therefore support cohesion. Supporting larger town centres, through retaining shops, is also essential in retaining community identity of these areas, which may have an historic 'market town' role.
Biodiversity	-	No direct relationship.
Landscape character	-	No direct relationship.
Built environment	●	Retaining shopping in the town centre should help to maintain the built environment of these areas, subject to it being of a suitable scale and style.
Historic heritage	?	The town centres of Abergavenny, Chepstow and Monmouth are all based on an historic core, with different centres having different levels of heritage. In all centres it will be essential that new retail does not harm the quality of these assets and enhances them as suitable.
Air	●	Focused development on existing town centres should help reduce the need and distance people travel by car as often these locations are the most east to get to by bus, train, walking and cycling. Supporting these areas in the long-term as a development focus is essential for creating a sustainable pattern of development where car travel is not automatically the primary mode of access.
Water quality	-	No direct relationship.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.

Minerals and waste	-	No direct relationship.
Land and soil	-	No direct relationship.
Energy	-	No direct relationship.
Employment	?	Enhancing and retaining retail in the County can support jobs, although these are likely to be lower paid and poorer quality employment.
Wealth creation	-	No direct relationship.
Climate change	?	Impacts on climate change are broadly positive, with more accessibly located development helping to reduce (or at least not increase) the need to travel by car. This could help to mitigate against the cause of climate change.

Sustainability summary and significant impacts

The location of retail centres, along with the location of housing and employment, is one of the main influences an LDP can have on creating a pattern of development that helps reduce car use by locating everyday services in locations that have good access and support an approach of reducing car use. This policy needs to be more clear on what the stated hierarchy means for the type and scale of retail development that would be permitted in each retail centre.

The wording of the policy could be altered to help make it more clear where development will be permitted and where it will not be. This could either be through supporting development management policies as part of the full LDP. Policies could set out an approach to out-of-town retailing and resisting change of use of shops in local and villages centres, and greater clarity on the scale of retail permitted in local or neighbourhood centres so as not to harm the function of town centres.

Recommendations including mitigation

- The hierarchy is shown but the policy text gives no indication of what this means for the scale of development permitted in each.
- The policy wording could be adjusted to give greater clarity on where retail will be permitted, where change of use will be limited and where retail development will not be permitted. However, a development management policy gives further information that could be referred in this strategic section.
- New retail development in town centres will need to respect and enhance the character of these areas, where necessary bringing improvements to the built and historic environment.

Audit trail

This policy has been revised since the Preferred Strategy. However, there is no substantial change to the sustainability performance of the policy.

Policy S7 – Infrastructure provision		
This is a very broad policy with the purpose of making sure new infrastructure delivery is delivered to meet the needs of new development as part of phased delivery.		
Objective		Comment
Access to services	●	Infrastructure, includes public transport, walking and cycling routes. Therefore, if the policy is successfully implemented it could help to achieve more accessible development. However, this will be also be contingent on the provision of access improvements that are beyond the direct control of the LDP.
Housing	-	No direct relationship.
Health and wellbeing	●	Infrastructure, as it is described in supporting text, includes community services such as healthcare. Therefore, if the policy is successfully implemented it could help to achieve good provision of local health facilities.
Community	●	The provision of infrastructure that is fully phased into development, particularly of larger sites or locations of rapid growth, is essential in order to preserve or create community cohesion. Local services should be in place from an early stage of new development to help new residents identify with their local area as soon as possible.
Biodiversity	●	Infrastructure, as it is described in supporting text, includes ecological mitigation and green infrastructure. Therefore, if the policy is successfully implemented it could help in protecting and enhancing local biodiversity.
Landscape character	?	Infrastructure, as it is described in supporting text, includes green infrastructure. Therefore, if the policy is successfully implemented it could help in the protection and enhancement of landscape features.
Built environment	?	New infrastructure, such as new community buildings, have the potential to deliver high quality landmark buildings in the built environment.
Historic heritage	?	New infrastructure, such as new community buildings, have the potential to deliver high quality landmark buildings in the built environment.
Air	●	The infrastructure types covered in this policy include new sustainable transport facilities and should help in meeting air quality objectives relating to reducing car use. New green infrastructure can also have benefits for air quality.
Water quality	●	Infrastructure, includes utility infrastructure. Making sure that there is sufficient capacity in the waste water infrastructure, including sewers, surface water drains, and water treatment, will be essential in maintaining or improving water quality.

Water supply	?	Infrastructure will include water supply utilities, although this will not reduce water use.
Flood	●	Infrastructure, includes flood infrastructure including drains and other measures to reduce flood risk.
Minerals and waste	-	No direct relationship.
Land and soil	-	No direct relationship.
Energy	?	Infrastructure includes energy infrastructure such as renewable energy. However, there will need to be more detail on how this is to be delivered based on a national grid input or community scale, as there is no national policy requirement directly relating to this need.
Employment	-	No direct relationship.
Wealth creation	?	Infrastructure provision will be part of providing for new employment. Depending on the business type there will be various needs, including transport access to large scale utilities provision.
Climate change	?	Impacts of this policy on climate change are most likely to be positive. Some elements of infrastructure will help play a role in mitigating against the climate change through encouraging more sustainable travel.

Sustainability summary and significant impacts

Infrastructure delivery of all types, including transport, utility and community is essential to creating a sustainable place. This policy should help in delivering these needs, although this strategic policy is very broad coverage a range of different issues. It will be important for the full LDP to contain more detail on specific types of infrastructure, including details of how it is to be phased in to development.

- For some issues more detailed expectations of delivery may be needed to support policy, for example the provision of renewable energy.
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Recommendations including mitigation

Audit trail

The revised policy from the Preferred Strategy contains a reference to financial contributions and a general presumption in favour of new utilities infrastructure. The policy now includes the infrastructure elements that may be sought as part of new development. However, these have not resulted in any fundamental changes to the sustainability appraisal of the policy.

Policy S8 – Enterprise and economy		
Policy S9 – Employment sites provision		
These two policies set out the LDP strategy for provision of employment in the County. They cover the general principles on which planning decisions will be made for employment sites and the locations for the majority of employment growth in the County.		
Objective		Comment
Access to services	?	<p>The largest employment allocation is at Magor with 39ha of allocated land. These allocations are in out of town locations and are therefore likely favour car drivers for access. Sites at Magor are just off the M4.</p> <p>However, employment growth associated with the main towns such as Monmouth, and Chepstow will support more sustainable travel patterns. The sites at Llanfoist are some distance from Abergavenny, however, provide a useful employment site in the northern part of the County where land for growth is limited by environmental constraints. Magor is also to receive quite a large proportion of the new housing development that may help some accessibility of jobs for Magor/Undy residents, although this may depend on the type of jobs provided.</p> <p>The policy identifies the need for countywide broadband infrastructure this can help provide accessible employment by supporting home working.</p> <p>Retaining employment use on existing employment sites is essential in maintaining job levels in Monmouthshire. Retaining this land will be particularly important in towns where there are land constraints and few allocations for new employment, such as in Chepstow. This is essential in creating more sustainable patterns of development and improving access to employment.</p>
Housing	-	No direct relationship.
Health and wellbeing	?	Providing accessible jobs could help improve the well-being of residents.
Community	?	Providing new jobs as part of towns can help support local communities and traditional working patterns.
Biodiversity	?	<ul style="list-style-type: none"> Several of the sites are in locations that border on highly important nature conservation sites. <p>Sites that may impact on internationally designated nature conservation sites are likely to need site specific ‘appropriate assessment’ to appraise their impact on nature conservation sites and demonstrate how development will not harm these sites.</p> <p>All new employment development should seek to protect and enhance the natural environment, and aim for no net loss of biodiversity through sensitive site management and landscaping for wildlife.</p>

Landscape character	?	<p>Allocations at Llanfoist may be in close proximity to the Brecon Beacons National Park, the design of development should make sure that it does not significantly harm views from the Park. Similarly development at Monmouth may need to take into account the impacts on the Wye Valley AONB.</p> <p>All new development in peripheral locations will need to make sure it is designed and landscaped in a way that helps make a smooth transition from urban to rural landscapes. This should avoid the adverse impacts that poorly designed and planned urban fringe development can have on landscape character.</p>
Built environment	?	<p>New employment development can have a large impact on the built environment, particularly on those sites that may be part of the town centre such as in Chepstow. New development will have to be of high build quality and avoid adversely impacting on local character.</p>
Historic heritage	?	<p>New development will have ensure that it does not harm historic heritage as part of built heritage, buried heritage and the landscape.</p>
Air	x/?	<p>There is the opportunity for new employment to help create more sustainable patterns of development but helping achieve greater self-containment. However, many of the allocations will only really be accessible by car, which is likely to have negative impacts on air quality. The policy identifies the need for countywide broadband infrastructure this can help reduce the need to travel for work improving air quality.</p> <p>Retaining employment use on existing employment sites is essential in maintaining job levels in Monmouthshire. This could help reduce the need and distance travelled for work, as many new allocations will be on the periphery of towns, whereas existing sites can be integrated into them.</p>
Water quality	?	<p>New employment development will need to ensure that it does not harm the water quality, through proper infrastructure development and full licensing where necessary.</p>
Water supply	?	<p>New employment development will inevitably result in the use of more water. It is essential that new buildings are designed to minimise water wastage, making use of non-potable water sources wherever possible.</p>
Flood	?	<p>Land to the west of Magor, where there are several employment allocations, is in partial risk of flood. There may also be a risk of flood near the Grove Farm site in Llanfoist and at the Wonastow Road site in Monmouth. The site at Chepstow is alongside the River Wye and although flood is not identified as an issue for much of the site the risks will need to be taken into account.</p> <p>All new development will have to take flooding risk into account in the type, use, design of buildings and drainage</p>

		systems. These precautions are needed to avoid flood risk on and off site.
Minerals and waste	?	New employment development will inevitably result in the use of more natural resource and create additional waste. It is essential that new buildings are designed to minimise waste and take into account sustainable construction objectives in choice of building materials.
Land and soil	?	The strategic employment allocations include greenfield sites, and are likely to result in a loss of green land and soil resources. Retaining employment sites is likely to be a good use of land, if existing sites are lost it is likely replacements will be on greenfield land given the lack of available previously developed land.
Energy	?	New employment development will inevitably result in the use of more energy. It is essential that new buildings are designed to ensure good energy efficiency and developments should incorporate energy generation from renewable resources where possible.
Employment	●	These policies are likely to help increase jobs in Monmouthshire. Policies also support the development of small business units to help business start-ups and indigenous growth this may help support more local jobs.
Wealth creation	●	These policies should help support wealth creation in Monmouthshire. Policy S8 is specific on helping support of existing key economic sectors in Monmouthshire, including tourism. Policies also supports the development of small business units to help business start-ups and indigenous growth.
Climate change	?	As noted in the access and air objectives assessment it is not really clear the extent to which these strategic sites will help create more sustainable patterns of development, reducing car use. It is hoped that new employment in locations not near the M4 will help improve the self-containment of these towns for jobs and work, and new employment development in Magor may help reduce long-distance commuting from Magor/Undy. This could help to mitigate against climate change. The policies identify the need for countywide broadband infrastructure this can help provide accessible employment by supporting home working, reducing the need to travel. The policies will also need to help mitigate against the impacts of climate change, such as avoiding putting development in areas at too high risk of flood or where they would exacerbate off-site flood risk.
Sustainability summary and significant impacts		
Allocating employment in suitable quantities, of a suitable type and in suitable locations is essential for creating more sustainable patterns of		

development to reduce car travel. Employment land is also needed to help meet employment related sustainability objectives.

In order to promote the more sustainable location of businesses that have a high employee density, such as offices, it may be suitable for a policy to be in place to make sure these uses are prioritised in towns centres or transport hubs. Edge of town retail development can have substantial adverse impacts related to increasing car travel, as often access by car is the only really viable option to sites of this type. Car commuting at these locations can cause adverse environmental and amenity impacts, as well as economic impacts through congestion at peak times.

It is noted that some of these are already committed for development and where they already have planning permissions there is little opportunity to make sure sites are delivered according to revised policy. However, on the other sites it will be important that sites are delivered in a way that helps mitigate against adverse impacts on social and environmental sustainability, and where possible maximises sustainability benefits.

Recommendations including mitigation

- The quantity of development that is proposed through these policies will require sustainable construction practices to be followed, this should include reducing carbon emissions through more energy efficient development and requiring a proportion of energy to be from renewable sources in line with other policies of the plan.
- New employment development will need good quality public transport, cycling and pedestrian links to residential areas and transport interchanges to help in reducing car travel.
- The SA and HRA identify that many of the sites are near areas of high biodiversity sensitivity, and may require further assessment under the Habitats Regulations on a site specific basis.

Audit trail

These two policies replace two existing policies from the Preferred Strategy. Previous policies included more detailed reference to the seven sites that are to be allocated for employment, and these were appraised for the policy. Other policies were more straightforward relating to protection of employment sites. The change in policy has removed some of the specific detail from the SA of the policies, but the strategic approach will still have broadly the same sustainability implications.

Policy S10 – Rural enterprise

This policy allows for new economic development in the rural area. The policy makes it clear that this type of development will be preferred in re-used buildings. However, new development of this type would be allowed in ‘exceptional circumstances’.

Objective		Comment
Access to services	?	This policy may help access to rural jobs. However, development will need to be of a suitable scale and not create unsustainable patterns of commuting, such as people travelling out from the main towns to the rural area for work.

Housing	-	Unlikely to be any direct impact.
Health and wellbeing	-	Unlikely to be any direct impact.
Community	●	New rural enterprise can help support viable rural communities. Allowing this type of development should help make sure residents of rural areas can maintain or create a working connection to the place where they live.
Biodiversity	?	Where development includes re-use of rural buildings it will be important to demonstrate there is no impact on bats or birds including owls, which may be using the buildings for roosts/nests.
Landscape character	?	There is the potential for landscape impacts through new building in the rural area or open countryside. Therefore, new development will have to be located and designed to reduce impacts.
Built environment	?	Re-use of rural buildings may present the opportunity to retain parts of the built heritage. New buildings will have to be suitable to the existing character of the area.
Historic heritage	●	This policy may allow for historic buildings in rural area to be brought back into good use, other policies to protect historic heritage character could be used to ensure renovation does not harm the original character.
Air	?	This policy may help access to rural jobs near where people live, thereby helping reduce car travel. However, development will need to be of a suitable scale and not create unsustainable patterns of commuting, such as people travelling out from the main towns to the rural area for work, and thereby increase car travel.
Water quality	-	No direct impact.
Water supply	-	No direct impact.
Flood	-	No direct impact.
Minerals and waste	-	No direct impact.
Land and soil	-	No direct impact.
Energy	-	No direct impact.
Employment	●	This policy may aid access to employment in rural areas.
Wealth creation	●	This policy will play a role in helping support economic growth in Monmouthshire.

Climate change	?	Unlikely to be any major impacts on climate change. However allowing employment growth in rural locations may help provide accessible jobs to local people. Employment development in rural areas will need to be of a scale suitable to its location to avoid creating unsustainable travel patterns and increased car travel.
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Sustainability summary and significant impacts

Generally, this policy should help support more sustainable development in supporting rural communities by allowing rural enterprise developments. It will be important to make sure the scale of these developments, in terms of the number of employees and business type, is suitable to the location and will not cause an increase in car travel.

Recommendations including mitigation

- Applying the development management policies on the particularly circumstances when this development will be permitted should help manage potential harm to the landscape, historic or built heritage value of the area, as well as controlling the need to travel.

Audit trail

The policy remains largely unchanged, although now refers to the need for no unacceptable harm to biodiversity or local amenity. These wording changes have a general positive impact on sustainable development objectives.

Policy S11 – Visitor economy

This policy simply states that new tourism development will be permitted, subject to other policies. Existing tourist facilities or features should be protected.

Objective		Comment
Access to services	?	This policy may help improve access to tourism facilities.
Housing	-	No direct relationship.
Health and wellbeing	-	No direct relationship.
Community	-	No direct relationship.
Biodiversity	?	The location of new facilities has the potential to have an impact on biodiversity assets. Biodiversity may be one of the features of tourism in interest in the County, this policy could aid protection of this asset.
Landscape character	?	The location of new facilities has the potential to have an impact on landscape assets. The landscapes of the County may be one of the features of tourism interest, this policy could aid protection of these assets.

Built environment	?	New tourism development should ensure no harm comes to the built environment.
Historic heritage	?	The location of new facilities has the potential to have an impact on historic heritage assets. The historic heritage of the County may be one of the features of tourism in interest, this policy could aid protection of these assets.
Air	?	The policy is not very clear on what 'sustainable forms of tourism' are. For new tourism development to be sustainable it should not increase the need to travel, and new types of this development should be in urban areas wherever possible. Where development is in the rural areas it should be accessible by public transport.
Water quality	-	No direct impact.
Water supply	-	No direct impact.
Flood	-	No direct impact.
Minerals and waste	-	No direct impact.
Land and soil	?	New development of this type may required land take.
Energy	-	No direct impact.
Employment	●	This policy should help support continued employment in tourism in the County. New tourism development should aim to create good quality employment, ideally seeking types of development that would support year-round jobs.
Wealth creation	●	Tourism is an important component of the Monmouthshire economy. Continued support of this sector will help wealth creation in the County.
Climate change	?	The policy is not very clear on what 'sustainable forms of tourism' are. For new tourism development to be sustainable it should not increase the need to travel and therefore CO ₂ emissions. New types of this development should be in urban areas wherever possible. Where development is in the rural areas it should be accessible by public transport.
Sustainability summary and significant impacts		
This policy is not very specific in its aims, therefore drawing firm conclusions on sustainability impacts is not possible. However, continued support for tourism should help support the economy.		
Recommendations including mitigation		

- High trip generating tourism development should be restricted to the main towns to avoid increasing the need to travel.

Audit trail

This is a new policy.

Policy S12 – Sustainable development

This criteria based policy sets out the principles on which all development will be judged, with the intention of delivering more environmentally and socially sustainable development.

Objective		Comment
Access to services	-	No direct relationship
Housing	●	More energy efficient housing is an important part of creating high quality and affordable homes.
Health and wellbeing	●	More energy efficient housing with good insulation can help make homes more healthy. Protection from flood risk will also protect wellbeing.
Community	-	No direct relationship.
Biodiversity	?	No direct relationship. More sustainability constructed buildings can have benefits for biodiversity.
Landscape character	-	No direct relationship.
Built environment	-	No direct relationship.
Historic heritage	-	No direct relationship.
Air	?	More energy efficient homes can have benefits for air quality.
Water quality	-	No direct relationship.
Water supply	?	More sustainable construction should include making sure water is used more efficiently. In addition, the policy could refer to the specific efficiency and sustainable construction standards that have to be met.
Flood	?	The policy includes a criteria on flood, however this could be improved by providing greater certainty to all users of the

		LDP when developing on a flood plain would or would not be permitted. This should use more unambiguous language to improve clarity. More detail on flood risk is covered through a development management policy.
Minerals and waste	?	More sustainable construction should include making sure resources are used more efficiently, ideally reducing waste and use of primary materials. In addition, the policy could refer to the specific efficiency and sustainable construction standards that have to be met.
Land and soil	-	No direct relationship.
Energy	?	The policy includes the need to use energy more efficiently. In addition, the policy could refer to the specific efficiency and sustainable construction standards that have to be met.
Employment	-	No direct relationship.
Wealth creation	-	No direct relationship.
Climate change	?	Generally this policy is positive in helping to mitigate against climate change. This includes promoting more sustainable travel and more energy efficient buildings. The policy criteria may also help to mitigate against climate change through the avoiding flood risk areas and improving water efficiency in new buildings.
Sustainability summary and significant impacts		
<p>The policy shows good intentions of delivering development that is more sustainable. This includes development that follows sustainable construction principles and protects the quality of the natural and built environment.</p> <p>Other strategic and development management policies address other matters of fundamental importance for sustainable development. These include policies on accessibility and sustainable transport, energy use, protection and enhancement of the natural and built environment.</p>		
Recommendations including mitigation		
<ul style="list-style-type: none"> • Policy should set the standard of Code for Sustainable Homes that new housing will be expected to meet, including the threshold size of development to which this would apply • Policies could set minimum densities for all new development, with perhaps higher standards for accessible locations such as town centres and near public transport interchanges and stations. 		
Audit trail		
The policy is largely the same as in the Preferred Strategy, there have been some wording changes and this may make the policy easier to implement.		

This has a positive impact on achieving sustainable development.

Policy S13 – Landscape, green infrastructure and the natural environment

This policy sets the principles for protecting and enhancing the natural environment of the County, including the landscape, biodiversity and green infrastructure.

Objective		Comment
Access to services	?	Green infrastructure should include footpath and cycleway links, helping people access services by alternatives to the car.
Housing	-	No direct relationship.
Health and wellbeing	●	Access to and views of high quality landscapes and green spaces can have a positive impact on mental wellbeing, as well as proving a recreational resource for walking and cycling Bringing wildlife and plants into urban areas, as well as by providing parks and public spaces, can also have benefits to health and wellbeing
Community	●	A distinctive landscape character and access to community open space can be an important component of local identity and this can be an important part of what makes a community. Green infrastructure may include open spaces for formal and informal recreation. These spaces can be important as community meeting spaces.
Biodiversity	●	The policy directly relates to the protection of biodiversity and landscape features of importance to biodiversity. The policy includes protection and enhancement of the natural environment. Green infrastructure links can also include connective and linking features of importance to biodiversity. These may be essential for maintaining viable populations of some species and helping species move with a changing climate.
Landscape character	●	The policy relates directly to meeting this sustainability objective and protecting and enhancing landscape character. Additional policy considerations could include conserving existing key landscape views and vistas from urban areas.
Built environment	?	Integration of wildlife routes, trees and green spaces into towns and villages are an essential part of creating a high quality urban environment.
Historic heritage	?	The landscape can be an historic resource, demonstrating past patterns of land use. Therefore, protecting landscapes can have benefits in historic heritage protection.

Air	?	Protection of landscape and biodiversity assets can help in maintaining air quality.
Water quality	?	Protection of landscape and biodiversity assets can help in maintaining water quality.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.
Minerals and waste	-	No direct relationship.
Land and soil	?	It is likely that landscape protection will also help the protection of land.
Energy	?	For some types of renewable energy generation technology there may be a need to balance the impacts on the landscape with the benefits from low carbon power. There is the potential for adverse impact on the landscape.
Employment	-	No direct relationship.
Wealth creation	?	The high quality natural environment in Monmouthshire is an important part of making the area an attractive location for business and investment. Therefore, protecting these assets may help support wealth creation in Monmouthshire.
Climate change	●	Generally the policy is likely to be positive in relation to adaptation to climate change, this includes protecting the landscape features that provide movement routes for plants and animals to help them respond to a changing climate. The green infrastructure network policy could also help to incorporate trees and other plants into the urban area, helping to reduce heat island impacts that may result from a warming climate.

Sustainability summary and significant impacts

This policy is likely to have a positive impact on achieving sustainable development. Green infrastructure can have a variety of sustainability benefits, including protection of the natural environment, biodiversity and landscape as well as creating an attractive place to live, supporting healthy lifestyles and improving non car access to services.

Recommendations including mitigation

- The policy will be improved once the Green Infrastructure SPG has been prepared. Without the additional guidance of the SPG it may not be possible to successfully secure all developer contributions toward enhancement of the network.
- Identification of specific sites and allocations could help improve the performance of this policy and ensure its successful implementation.
- Policy could include more detail on how the green routes and networks will be delivered and enhanced through development.
- The policy could be improved through greater clarity on the importance that will be given to protecting biodiversity assets, and in particular those of

internationally designated sites.
Audit trail
The policy has been reviewed to make is more clear and succinct, wording changes may help its implementation.

NB – Policy on climate change has been removed (was S12). The previous sustainability appraisal was supportive of the policy in helping to address sustainable development. However, the majority of criteria in the policy are covered elsewhere in the LDP.

Policy S14 - Waste		
This policy states that 5.6 hectares of land will be allocated for waste management. Some B2 employment sites will be suitable for waste management.		
Objective		Comment
Access to services	-	No direct relationship.
Housing	-	No direct relationship.
Health and wellbeing	?	Allocation of land for waste facilities can help make sure that these are strategically located to avoid risks to health and wellbeing of residents.
Community	-	No direct relationship.
Biodiversity	?	Allocation of land for waste facilities can help make sure that these are strategically located to avoid risks to biodiversity. Development will have to ensure no harm to habitats and species of biodiversity importance, on or off-site.
Landscape character	?	Allocation of land for waste facilities can help make sure that these are strategically located to avoid risks to landscape character. Some additional investigation of sites for specific types of waste management may be necessary. In particular, sites for landfill will need to be chosen to avoid landscape impacts.
Built environment	?	Allocation of land for waste facilities can help make sure that these are strategically located to avoid risks to the built environment quality.
Historic heritage	?	Allocation of land for waste facilities can help make sure that these are strategically located to avoid risks to historic heritage.
Air	?	The strategic allocation of waste sites should be beneficial in making sure that waste management facilities of sufficient capacity are available locally, without the need to transport waste longer distances for treatment. This reduction in waste

		transportation has the potential to reduce air quality impacts.
Water quality	?	The strategic allocation of waste facilities could help in avoiding water quality impacts. In addition, the more sustainable management of waste, with less landfill disposal could help in protecting water quality from the impacts of waste run-off. The supporting text indicates that land may need to be found for new landfill sites, careful investigation of site suitability will be essential to avoid impacts to ground and surface water.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.
Minerals and waste	●	Providing facilities to manage waste in a more sustainable way should help in reducing the quantity of waste that is sent to final disposal in landfill. This can help reduce demand for primary resources, and depending on the method of treatment the energy embodied in the waste can be released for heat and power. Allocating sites through the LDP should aid the delivery of these new facilities, helping secure more sustainable use of materials in the shorter term.
Land and soil	?	Reducing waste to landfill can help to protect against the inefficient use of land for waste disposal.
Energy	●	Reducing final disposal of waste to landfill can help make sure that the energy embodied in materials is not wasted.
Employment	?	New waste management facilities will create new employment opportunities, although in some cases this will not provide very high quality jobs.
Wealth creation	?	Having allocated waste sites may encourage waste management operators to invest in the County.
Climate change	●	The more sustainable management of waste should help bring benefits in terms of helping mitigate against climate change.

Sustainability summary and significant impacts

Individual sites will need to be assessed for their particular suitability for different types of waste management, for instance depending on residential amenity, location and access issues.

The supporting text indicates that additional land may be required for landfill. Allocating a specific site for this may be useful in the LDP to help provide an early opportunity for comment on site proposals.

It will be important to make sure any new facilities are appropriately located and managed to avoid risks to the environment and people from pollution, including noise, water, air, litter, pests and odour.

Recommendations including mitigation

- The suitability of sites will need to be tested to make sure development is in locations that do not cause harm to the environment or amenity of residents.
- Achieving a reduction in waste will also require other strategies to be in place which help encourage household and business reuse and recycling of materials. This will need to be managed by other Council departments.
- Operational conditions will need to be in place to protect the environment and residential amenity.
- It may be suitable to consider how non-recyclable waste can be used to generate community heat and power as part of energy recovery facilities.
- Further investigation of sites may be suitable to ensure most suitable sites for different uses are prioritised.
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Audit trail

The Preferred Strategy policy stated that the LDP would allocate sites for new waste facilities. The SA of this previous policy was supportive of including these allocations in the LDP. The SA stated that: *“Allocation of this type of site through a strategic plan may help make sure that the sites chosen are able to minimise potential impacts on people and the environment, as well as being in accessible locations that reduce the distance waste needs to be transported for treatment. Allocating sites may also aid their delivery in the shorter-term, therefore helping to manage waste more sustainably, sooner than site by site proposals may allow.”* Specific sites are not allocated in this policy and therefore some of the advantage this may have in creating a more sustainable plan may be lost.

Policy S15– Minerals

This policy simply states that the supply of minerals in Monmouthshire will be safeguarded to avoid them being lost through inappropriately located development.

Objective		Comment
Access to services	-	No direct relationship.
Housing	-	No direct relationship.
Health and wellbeing	?	The location of new quarries has the potential to impact on health of residents. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Community	-	No direct relationship.
Biodiversity	-	The location of new quarries has the potential to impact on biodiversity that could be irreversible. However, as no new mineral workings are needed in the plan period there will not be an impact. Continued dredging of the Severn Estuary

		may have an impact on the internationally designated nature conservation sites, as noted in the HRA. Restoration and aftercare could be used to re-establish habitats in the area lost through past quarrying.
Landscape character	?	The location of new quarries has the potential to impact on the landscape. However, as no new mineral workings are needed in the plan period there will not be any additional impact. Restoration and aftercare could be used to re-establish features in the landscape lost through past quarrying.
Built environment	?	There may be some impacts on the built environment from quarrying depending on the location. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Historic heritage	?	There may be some impacts on the historic heritage from quarrying depending on the location that could be irreversible. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Air	?	The location of new quarries has the potential to impact on air quality through dust and transport movement. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Water quality	?	The location of new quarries has the potential to impact on water quality through changes to the groundwater. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Water supply	?	The location of new quarries has the potential to impact on water supply through changes to the groundwater. However, as no new mineral workings are needed in the plan period there will not be any additional impact.
Flood	-	No direct relationship.
Minerals and waste	●	This policy seeks to safeguard mineral working in the County. There can be no truly sustainable way of sustainably using finite natural resources. However, this policy aims to make sure there is an available supply to meet demand and that no resources are lost to inappropriate development.
Land and soil	?	New quarries if needed will lead to the loss of land and soil. However, restoration can aim to restore agricultural use in the long-term.
Energy	-	No direct relationship.
Employment	?	New quarries have the potential to create new jobs.
Wealth creation	?	New quarries can contribute to the economy of Monmouthshire.
Climate change	?	Impacts on climate change are not clear and will depend on actual policies that are developed and if new quarries are

		needed.
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Sustainability summary and significant impacts

No new quarries or other minerals workings are proposed through the policy or needed in the plan period. Therefore, additional impacts on people and the environment are unlikely. However, this type of development does have potential for adverse impacts on the environment through loss of land, removal of habitats, and changes in groundwater. There may also be impacts on people from the disturbance caused by mining and quarrying. It will be important to make sure no single community suffers unjustly from the impacts of mining.

WAG has a policy to favour dredging of sand and gravel from the Severn Estuary over land won aggregate. Dredging has the potential to cause hydrological and sediment changes to the banks of the estuary, and may adversely impact on the international nature conservation designations of the area. This may not be directly within the local authority boundary, however, some of the impacts may be due to workings that are managed from Monmouthshire.

The SA also identifies that there is no real way to manage finite minerals resources in a truly sustainable way, as their exploitation will result in their loss. However, policies that protect mineral resources from being wasted through inappropriately located development may help manage their use more sustainably. Policies to reduce demand for primary aggregates will also help to reduce the need for new quarries.

Recommendations including mitigation

- Much of the impact of this policy will depend on whether new sites are needed, meaning identification of significant impacts is not really possible at this stage. However, it is possible for new quarries to have multiple impacts on people and the environment and this will depend on location and management.
- Continued sand and gravel dredging in the Severn Estuary has the potential to have impacts on the internationally designated nature conservation sites, although these impacts many need to be managed by all local authorities along the Estuary in Wales and England.

Audit trail

The Preferred Strategy contained additional policy criteria on restoration of minerals workings, this criteria may have helped secure restoration, although this is likely to be a condition of extraction where applicable in any case. The policy also now refers to a 10 rather than 15 year landbank, which may free up more land for development.

Policy S16 - Transport

This policy sets the strategy for reducing car reliance and improving the transport system in Monmouthshire as part of the spatial planning approach. The second part lists specific transport schemes to be delivered including road, public transport, cycling and walking routes.

NB: The new M4 is likely to have some significant impact on the environment, however it is not addressed in the symbol summary and comment below as its development is largely controlled by the Assembly and Monmouthshire County Council can only have a limited impact on its delivery.

Objective		Comment
Access to services	●	Overall, the policy aims to provide more equitable access to services through providing improved access by alternative to the car. Making these alternatives a real alternative to car travel, through ease of use, cost, journey time etc, will be essential in achieving a mode shift from car use.
Housing	-	No direct relationship.
Health and wellbeing	?	There is the potential for more equitable travel access to improve wellbeing by reducing isolation. However, schemes to build new roads may have an adverse impact on health, including through air quality impacts.
Community	?	There is the potential for more equitable travel access to support communities.
Biodiversity	?	Transport proposals that involve land use change, such as road building, new park and rides and transport interchanges, have the potential to impact on biodiversity. These impacts will need to be managed as part of development proposals. Also, the impacts of road surface water run-off on biodiversity will need to be managed to avoid pollution impacts on biodiversity. Air quality impacts from road travel can also impact on biodiversity and measures to reduce car use are essential.
Landscape character	?	Transport proposals that involve land use change, such as road building, new park and rides and transport interchanges, have the potential to impact on landscape character. These impacts will need to be managed as part of development proposals.
Built environment	?	Transport proposals that involve land use change, such as road building, new park and rides and transport interchanges, have the potential to impact on the built environment. These impacts will need to be managed as part of development proposals, through appropriate high quality design of infrastructure and supporting buildings.
Historic heritage	?	Transport proposals that involve land use change, such as road building, new park and rides and transport interchanges, have the potential to impact on historic heritage. These impacts will need to be managed as part of development proposals.
Air	●	With the exception road schemes, which is likely to increase car use, the movement to more sustainable transport may help to improve air quality, including emissions of carbon dioxide.
Water quality	?	Road proposals will need to incorporate measures to avoid surface water run-off polluting waterways.
Water supply	-	No direct relationship.

Flood	-	No direct relationship.
Minerals and waste	-	No direct relationship.
Land and soil	?	Transport proposals that involve land use change, such as road building, new park and rides and transport interchanges, have the potential to impact on land and soil. These impacts will need to be managed as part of development proposals.
Energy	-	No direct relationship.
Employment	●	Improving access is likely to help in access to jobs, even by public transport. Due to the current high levels of commuting in and out of Monmouthshire for work better public transport will help more people travel by modes with less environmental impact.
Wealth creation	●	Improving access is likely to help in making Monmouthshire an attractive place for business. Helping more people choose alternative modes of travel to their car and road improvements should reduce congestion and benefit freight movement times.
Climate change	●	With the exception of road schemes, likely to increase car use, the movement to more sustainable transport may help to improve air quality, including emissions of carbon dioxide.

Sustainability summary and significant impacts

This policy sets out the transport projects to be delivered in Monmouthshire. These will include some projects related to public transport and improved walking and cycling, and the sustainability appraisal welcomes the inclusion of these infrastructure improvements in the LDP. Reducing travel by car through improving the attractiveness and safety of alternatives can have a variety of sustainability benefits, including more equitable access, lower carbon emissions, and improved air quality.

The policy or support text should include details of how development proposals will need to demonstrate compliance with the policy, for example through transport strategies or green travel plans. These are addressed in policy MV1 but should be highlighted as of being of strategic importance.

The road improvements can also have sustainability benefits in particularly related to economic benefits from quicker travel times. However, it should be noted that increasing road capacity will not be a long-term solution to reducing congestion and new roads encourage car use, and in the end congestion reaches current levels. Increased car use can also have a range of adverse sustainability impacts, including on air quality, health and climate change.

The spatial strategy will also play a role in reducing road impacts.

There will always be a need for personal transport in Monmouthshire as it is a rural County where it would not be possible to provide scheduled bus

services to all villages and hamlets. However, the LDP strategy and policies should aim to change the future patterns of development so more homes are built in more accessible locations, avoiding growing villages with very little potential of a bus link. Except in very limited circumstances no new development should be built in Monmouthshire where there is not some affordable alternative to car travel for making medium to long-distance trips. Alternative access modes is important to avoid issues of social isolation.

In the towns every attempt should be made to limit people's reliance on car, as part trips within their town and travel to work. The requirement to 'reduce the need to travel' is positive in seeking sustainable development. However, this is also a fundamental role for the spatial strategy of the LDP, therefore as a criteria in policy this is quite an ambitious objective for this policy.

The development of the new M4 Magor to Castleton is a scheme that is led by the Assembly, and therefore beyond the control of the Monmouthshire LDP. However, this scheme does not score well in sustainability terms. There is the potential for the scheme to reduce congestion on this part of the existing M4 but as with any road scheme in the long-term these benefits might be lost if demand for car travel does not decrease. Environmental and social impacts could be significant, including on the internationally designated Severn Estuary and the nationally designated SSSI on the Gwent Levels. New communities that will be near the route of the new road will also be adversely impacted on, with potential health and noise impacts and some communities becoming increasingly cut-off and inequitably affected roads.

Recommendations including mitigation

- To successfully deliver this policy it will be necessary to specify how developers can demonstrate they are helping to achieve a mode shift from car use, including the use of Travel Plans, maximum car parking standards etc. Part of this may also be tightening policy wording to demonstrate exactly what would be required from new development to gain planning permission.
- To fully achieve this policy it will need to be delivered in line with public transport operators' strategies, working with providers to improve public transport and make it affordable.
- The strategy will play an important role in creating travel patterns that support alternatives to car use, for instance by creating mixed use areas of development and providing a better match of jobs and homes.
- Policy MV1 contains important information necessary for implementing the sustainable transport strategy more fully.

Audit trail

The Preferred Strategy contained more detail on specific schemes the LDP would help to implement. These schemes have now been moved and added to in the detailed development management policies. The previous policy gave a more complete picture of transport policy in the County.

Policy S17 – Place making and design

This policy sets out the general principles for the design of development to help create attractive and sustainable places and to protect the character of existing areas.

Objective		Comment
Access to services	●	The policy includes the need to make development more accessible. Providing a permeable urban layout of new development is essential in helping to encourage walking and cycling rather than car travel, especially for short journeys to local services and providing links to public transport.
Housing	-	No direct relationship.
Health and wellbeing	●	This policy includes the requirement to design safe places. Some additional information on using development to help design out crime may be suitable in more detailed stages of the LDP.
Community	●	A high quality built environment is an essential component of creating a place that people feel connected to and proud of. This can help support the maintenance and creation of more cohesive communities. Increasing public spaces as part of urban design can also provide a focus for community events.
Biodiversity	?	Good design could include features to support biodiversity, including maintaining mature trees and good quality landscaping making use of local species.
Landscape character	?	Good design can help make the transition from town to county more attractive, ensuring urban peripheral development does not lead to the low quality buildings and landscapes that sometimes characterise the edge of towns.
Built environment	●	This policy directly relates to meeting this sustainability objective.
Historic heritage	●	It is likely that this policy can contribute to making sure the historic built and other heritage is respected by new development, which is designed taking into account its context.
Air	?	More accessible development could help reduce car use with benefits for air quality.
Water quality	-	No direct relationship.
Water supply	-	No direct relationship.
Flood	-	No direct relationship.
Minerals and waste	-	No direct relationship.
Land and soil	-	No direct relationship.
Energy	-	No direct relationship.
Employment	-	No direct relationship.
Wealth creation	●	An attractive living and working environment will help support and promote the area to investors.
Climate change	●	A high quality built environment can help in adapting to climate change, such as designing to reduce urban heat island effects. An accessible new development can help reduce car use and help in mitigating climate change impacts.

Sustainability summary and significant impacts

Overall this policy scores well against sustainability objectives, helping to deliver many aspects of sustainable development, from air quality impact reductions to protecting the built and historic environment. However, the current policy does not contain much detail or much that could directly be implemented to control development. More detail on how these requirements will be secured from development and how they will be implemented may be necessary in later version of the LDP and policy.

Recommendations including mitigation

- In the final version of this policy it will be important to show how developers will be expected to demonstrate they have taken these considerations into account, likely to be as part of a Design and Access Statement. The policy will also need to give relative certainty to all users of the plan when a proposal will and will not be suitable.
- Design and access statements could be referred to in supporting text.
- Policy DES1 will help the policy be implemented as it provides more detail on good design.

Audit trail

The Preferred Strategy policy remains unchanged.

Appendix 5

Sustainability appraisal of the site allocations policies

Policy SAH1 – Deri Farm, Abergavenny

This policy is for the development of the strategic site at Mardy, Abergavenny. The site is allocated for 300 new homes and is 8.5ha.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	?	●	?	?	?	?	?	●	-	●	-	x	?	?	?	?

Sustainability commentary

This site is to the far north of Abergavenny adjacent to the existing residential area of Mardy. The site assessment reveals it is within an area of relatively high natural environment quality and is greenfield land. The site contains habitats of some nature conservation importance and is located directly adjacent to the Brecon Beacons National Park. Impacts on these features will need to be mitigated through careful site design, the layout of development, and integration of natural features. New structural landscape and boundaries will be needed to limit impact on the National Park landscape and impacts on the nearby listed building.

Accessibility of the site is good, there is a shop under 500m from the site, as well as a primary school adjacent to the site, a pub is 200m away. Bus services connect the site to the town centre; although it is likely car access will be favoured by many future residents due to the peripheral location.

The site is near existing utilities connections, helping to ensure the safe disposal of waste water.

Policy S3 requires that proposals for the development of strategic sites includes a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to met on site. However, where feasibility studies are relied on the Council will need to ensure evidence is to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

The development of the site would include some visual improvements through the removal of power lines.

This site appears to be relatively sustainable, supplying needed housing to Abergavenny, in a location where impacts on environmental sensitivities can largely be mitigated against. The site has moderate access to central Abergavenny as it is situated a long way north of the town centre, however, there are some bus services linking to the centre and other nearby settlements. There are also a limited range of local services, although few shops.

Main impacts / mitigation / recommendations

- The Council could prepare a detailed design brief for the site. This would set good practice standards to be met on-site for matters such

as non-car access, low carbon development, design, mix of uses, and open space provision, rather than relying on developers objectives for a site. However, if developer design briefs are used the Council will need to ensure that these represent best use of land and the principles of sustainable place making.

- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. This will be through the Council setting standards for the site or through developers' own feasibility statements. The Council may need to prepare SPG or other guidance on achieving low carbon development.

Policy SAH2 – Crick Road, Portskewett

This policy is for the development of the strategic site at Portskewett. It is 9.6 ha although a further 1.5ha may have potential for development.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	•	?	?	?	?	?	?	?	•	-	•	-	x	?	?	?	?

Sustainability commentary

This site is greenfield on the northern periphery of Portskewett near Caldicot.

Development of this site would result in the sterilisation of high quality agricultural land, as more than half the site is Grade 2. The site assessment identifies that the site is relatively well placed to avoid impacts on wildlife sites, although this may need to be confirmed through the HRA. Development will need to take into account landscape impacts as the site does have some high quality elements and the setting to Farthing Hill. Development will need to protect landscape boundary features such as the field oaks.

Development is also promoted for quite low density development at only 34 dwellings per hectare. To achieve more sustainable use of land, as well as sustainable place making, even higher densities are favoured. Higher densities will reduce overall land take and provide a critical mass of population to help deliver and support new local services.

The design of new development will need to ensure it complements the Caldicot Castle Conservation Area that is only 90m from the site, as well as Caldicot Castle under 0.5km from the site.

The site has access to Caldicot town centre and a range of services in this location. The site is also within 800m of a bus stop with good bus links to Caldicot and Newport and there are a wide range of services and a convenience store around 500m away. There is also a nearby school although this is a faith school with selective entry. The nearest centre with a range of services is over 1km from the site and therefore new high

quality walking and cycling routes must be provided linking to the centre to ensure as many people as possible choose sustainable travel modes.

The site is near existing utilities connections, helping to ensure the safe disposal of waste water. Part of the site may be contaminated and suitable remediation will need to be undertaken to protect health and avoid pollution of watercourses.

The site is near some employment. This is identified as 'good neighbour' uses although include the premises of Megachem involved in chemical manufacture.

Development on this site will need to ensure no harm comes to the Areas of Archaeological Potential, as prehistoric artefacts have been found in the area.

Part of the site is not included in the allocation as it was not put forward as a candidate site, because of this availability is unknown and is not included as an allocation. However, if this site does become available over the plan period it will be important to ensure that this and the allocated site are developed in a cohesive way. For example, new internal roads should be designed so that the two sites can be properly accessible, as well as potential for connectivity of other infrastructure This is important to ensure the best use of land and/or avoid over allocation of land, and to identify its most suitable use (residential or employment).

Policy S3 requires that proposals for the development of strategic sites includes a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to be met on site. However, where feasibility studies are relied on the Council will need to ensure evidence to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

The site is in a relatively accessible location and subject to some walking and cycling route improvements could provide a good quality new residential area. However, development of the site would result in the loss of some good quality agricultural land and has the potential to have adverse impacts on the landscape and possibly on built heritage unless suitable mitigation measures are put in place.

Main impacts / mitigation / recommendations

- The Council could prepare a detailed design brief for the site. This would set good practice standards to be met on-site for matters such as non-car access, low carbon development, design, mix of uses, and open space revision, rather than relying on developers objectives for a site. However, if developer design briefs are used the Council will need to ensure that these represent best use of land and the principles of sustainable place making.
- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. This will be through the Council setting standards for the site or through developers' own feasibility statements. The Council may need to prepare SPG or other guidance on achieving low carbon development.
- Development of the allocated site should not prejudice the possible future development of the unallocated parcel of land it surrounds, for

instance roads need to allow for future straight line connections to the site.

- Careful landscape planting and retention of existing tree buffers will be necessary to ensure that development of the site does not harm landscape quality and views.
- The impacts of development on the historic environment needs to be considered in the design and layout of development, including the need to avoid impacts on Caldicot Castle conservation area and area of archaeological sensitivity.
- Setting higher development densities may help secure the more sustainable development of this site.

Policy SAH3 – Fairfield Mabey, Chepstow

This policy sets out the development criteria for the Fairfield Mabey site in central Chepstow, it is a mixed use site allocated for 240 new homes and employment use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	•	?	?	?	•	?	?	?	?	-	?	?	•	?	•	•	?

Sustainability commentary

This is a brownfield site in central Chepstow. The site is currently in use for employment, however, development includes new land for business and therefore development should not harm access to employment in the town.

Development is also promoted for quite low density development based on the land area for residential development and the anticipated yield. To achieve more sustainable use of land in this accessible location, as well as sustainable place making, higher densities are favoured. Higher densities will reduce overall land take and provide a critical mass of population to help deliver and support new local services.

The design of new development will need to ensure it complements the adjacent Conservation Area and views from the A48. Changes to the disused docks will impact on the current character of this part of the town and therefore new development will have to be of a high quality to give a new high quality focus to the area. Development will also have to ensure that it does not harm the setting of nearby listed buildings and structures, including the railway bridge and Chepstow Castle. Development on this site will need to ensure no harm comes to the Areas of Archaeological Potential, as prehistoric artefacts have been found in the area.

Part of the site is in Zone C2 floodplain and development in this area should be restricted to less sensitive land uses.

The site is in central Chepstow with relatively good access to the services the town has to offer. However, the site is physically separated from other urban areas by the railway and the river, so new pedestrian and cycle access will need to be delivered to ensure accessibility. The policy includes several criteria relating to site access and it is hoped that these will not affect the viability of the site for development.

The site is near existing utilities connections, helping to ensure the safe disposal of waste water. Part of the site may be contaminated and suitable remediation will need to be undertaken to protect health and avoid pollution of watercourses.

Development of this site must protect the adjacent River Wye SAC from harm. The policy refers to the need to protect this wildlife asset and may also need to recognise the potential harm from land contamination created by the previous use of the site. Protection of the river during the construction phase (as well as operational phase) is essential. Site specific appropriate assessment under the Habitats Regulations Assessment will likely to be required as specified in the LDP appropriate assessment.

Policy S3 requires that proposals for the development of strategic sites includes a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to be met on site. However, where feasibility studies are relied on the Council will need to ensure evidence to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

This site is in a central urban location on previously developed land. Development of the site has potential to provide a sustainable site for housing. However, there are a number of constraints on development that may make the site difficult to deliver, this includes access under/over the railway line, which may limit overall capacity. Walking and cycling access routes also need to be improved. The site is also adjacent to the River Wye SAC and it is essential that the qualities of this nature conservation site are not harmed during construction or in occupation of the site.

Main impacts / mitigation / recommendations

- The Council could prepare a detailed design brief for the site. This would set good practice standards to be met on-site for matters such as non-car access, low carbon development, design, mix of uses, and open space provision, rather than relying on developers objectives for a site. However, if developer design briefs are used the Council will need to ensure that these represent best use of land and the principles of sustainable place making.
- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. This will be through the Council setting standards for the site or through developers' own feasibility statements. The Council may need to prepare SPG or other guidance on achieving low carbon development.
- The policy contains many elements that need to be delivered through s106 agreements. For the site to be allocated and secure sustainable development it needs to be made sure that meeting these constraints do not jeopardise the viability of the allocation and its deliverability. If the site is not deliverable then there is a risk that elements of the chosen sustainable spatial strategy will not be met.
- A larger area of employment development may be suitable at this site to help deliver new jobs in the town.
- Development must ensure that it does not harm the adjacent SAC site.
- Development needs to consider the risk of flood on the site, further assessment will be necessary and development designed

accordingly.

- New development will need to be of a high design quality to ensure there is no harm to the setting of nearby Conservation Areas and listed buildings and structures.

Policy SAH4 – Wonastow Road, Monmouth

This policy sets out the development criteria for the Wonastow Road site on the south western periphery of Monmouth. It is a mixed use site allocated for 370 new homes (on 10ha) and 6.5 ha employment use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	•	?	?	x/?	?	•	?	?	•	-	?/x	-	?	?	•	•	?

Sustainability commentary

This is a greenfield site on the south western periphery of Monmouth.

Around a third of the site is high quality agricultural land, if development occurs in this location this soil will be sterilised from future use. Other elements of high natural environment quality include part of the larger site being locally important for nature conservation. However, this part of the site could be avoided through the appropriate location of new development. The site is also in a Special Landscape Area, however, careful site design and boundary landscaping could avoid adverse impacts as the site is relatively self-contained.

Development is also promoted for quite low density development at only 18 dwellings per hectare. To achieve more sustainable use of land, as well as sustainable place making, even higher densities are favoured. Higher densities will reduce overall land take and provide a critical mass of population to help deliver and support new local services. A lower yield on this site will allow development to be located on the site to minimise landscape and biodiversity impacts. However, this low yield should not be permitted to result in a poor urban layout with large individual plot sizes.

A large part of the site is in flood zone B and part is in C1. Development will need to be located on the site to avoid risks and vulnerable land uses kept away from parts of the site most at risk.

Some improvements to walking and cycling access to the site will be essential to allow new residents to have good car accessibility to the services of central Monmouth. The site is on the far-side of an employment area from the town centre, therefore, these routes need to be attractive to users to overcome the possible perceived barrier this creates. Near the site services are limited with no local shops (nearest are in the town centre 750m away), although there is a nearby primary school and amenity open space. The site has nearby employment opportunities in the centre and business park.

Design will need to be of a high quality, however, there are no built heritage assets directly adjacent to the site.

The site is near existing utilities connections, helping to ensure the safe disposal of waste water. Part of the site may be contaminated and suitable remediation will need to be undertaken to protect health and avoid pollution of watercourses.

Development on this site will need to ensure no harm comes to the Areas of Archaeological Potential, as part of the site contains elements of Medieval Open Field systems. Protection of these historical features may need to be incorporated into site design.

Policy S3 requires that proposals for the development of strategic sites includes a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to be met on site. However, where feasibility studies are relied on the Council will need to ensure evidence to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

The site is under 1km from central Monmouth and with new cycle and footpath links presents an opportunity for sustainable development. The quantity of new development proposed may also help support new local services. Development layout on site should also be able to avoid adverse impacts on the landscape and nature conservation assets of the larger site. Development must also take into account flood risk and ensure vulnerable land uses are suitably located. New employment development will help meet employment needs in the town and wider County.

Main impacts / mitigation / recommendations

- The Council could prepare a detailed design brief for the site. This would set good practice standards to be met on-site for matters such as non-car access, low carbon development, design, mix of uses, and open space provision, rather than relying on developers objectives for a site. However, if developer design briefs are used the Council will need to ensure that these represent best use of land and the principles of sustainable place making.
- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. This will be through the Council setting standards for the site or through developers' own feasibility statements. The Council may need to prepare SPG or other guidance on achieving low carbon development.
- The need for road improvements should be limited to those that are essential, new roads should be provided at a reasonable level so as not to impact on site viability and encourage increases in car travel.
- Further investigation of landscape, biodiversity and flood impacts will be necessary. Development of the site will need to demonstrate that flood risk and harm to the SINC are taken into account in the design and layout of development.
- The possibility of new local services to be provided as part of a mixed use development should be looked on favourably in planning applications, mix of uses could be promoted through policy. These will have the potential to create a new community focus.

Policy SAH5 – Rockfield Farm, Undy

This policy sets out the development criteria for the Rockfield Farm site on the north eastern periphery of Undy. It is a mixed use site allocated for 200 new homes and 4 ha employment use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	●	?	?	?	?	-	?	?	●	-	-	-	?	?	●	●	?

Sustainability commentary

This is a greenfield site on the Rockfield Farm site on the northern edge of Undy, directly to the south of the M4.

Some of the site is Grade 2 and 3a agricultural land, and depending on the layout of development this could be lost. However, the natural environment quality of this site is relatively low, although there is the Gwent Levels SSSI 500m from the site and there is the potential for UK protected species to be found on site. Further investigation of ecological potential will be needed to ensure development takes into account potential harm to biodiversity.

The site is a 'green wedge' although this designation only protects openness and does not represent landscape quality. However, a landscape assessment identified the site is of value to the area and rises to the west, a tree belt is visible from the M4. Therefore, careful landscaping on the boundary and retention of all hedges and trees where possible should help in maintain some of the landscape quality.

The site has good access to bus services that connect to town centres such as Chepstow, Caldicot and Newport. However, the site has limited direct access to services, the nearest general store almost 1km from the site, similarly other services including doctors and recreation space are over 1km from the site.

Magor / Undy currently lacks large employment areas and has the characteristics of a 'dormitory' town dominated by blocks of housing development from the last 40 years. Undy also lacks its own village centre meaning there is limited space for community interaction. The nearest shop is nearly 1km away, although there is a school within 1km also. The site is also far from existing employment areas, although new employment on the site should help provide some local jobs. The policy criteria also request that new community services are provided on-site, more detail on what these should be (i.e. space for a shop, health centre, community centre etc) and the scale help as part of making a more sustainable place. There is a need to provide new foot and cycle links to the services of Magor, particularly the need to overcome the perceived boundary that will be created through the undeveloped strip of land to the south of the site.

Development would impact on existing residents as it includes an area of Amenity Open Space and footpaths. The design of new development would need to incorporate new open space and ensure that footpaths are retained where possible or else re-routed.

Design will need to be of a high quality and should complement the Conservation Area near the eastern boundary of the site. Development also

should not harm the setting of the nearby standing stone that is a Scheduled Ancient Monument.

Further survey of the ground may be needed to check for ground contamination and stability from the former use of the site. If identified then remediation will be essential to ensure no harm to health or the natural environment.

The site is also very close to the M4 and appropriate sound mitigation in new development, or boundaries to the M4 will be necessary to avoid adverse impacts of noise on new residents. Proximity to the M4 may also have some adverse impacts on health from poor air quality.

Policy S3 requires that proposals for the development of strategic sites include a detailed feasibility assessment for renewable energy, this may help to ensure more efficient energy use on site and reduce overall demand for fossil fuels. However, the site's performance could be improved through the Council setting low carbon standards that have to be met on site. However, where feasibility studies are relied on the Council will need to ensure evidence to up-to-date and robust and the developer has made every attempt to integrate low carbon, efficiency and/or renewable energy technology into development.

The site presents an opportunity to extend the Magor/Undy settlement. However, to make development as sustainable as possible care needs to be taken to ensure the landscape is protected where possible and that new employment opportunities are created and new community services provided. There is the risk that new homes in this location could further embed the characteristics of the Undy area as a commuter town, lacking individual character and almost entirely reliant on car travel.

Main impacts / mitigation / recommendations

- The Council could prepare a detailed design brief for the site. This would set good practice standards to be met on-site for matters such as non-car access, low carbon development, design, mix of uses, and open space provision, rather than relying on developers objectives for a site. However, if developer design briefs are used the Council will need to ensure that these represent best use of land and the principles of sustainable place making.
- Making sure low carbon energy solutions and efficiencies are incorporated into the design of development from the outset may help ensure the viability of schemes and therefore achieve the best outputs. This will be through the Council setting standards for the site or through developers' own feasibility statements. The Council may need to prepare SPG or other guidance on achieving low carbon development.
- The policy should be clear if community facilities should be incorporated into development, based on an identification of local needs. This is to ensure there is accessibility to services - new facilities could include community space and a local shop, and improvements to walking and cycling routes are essential to link to nearby village and town centres.
- The policy could refer to other matters raised in the site assessment process that need to be taken into consideration in development to reduce impacts, such as landscape planting and protection of footpaths.

Policy SAH6 – Tudor Road, Wyesham

This policy sets out the development criteria of a site in a Monmouth suburb for 35 new homes, to include a special care facility.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	●	-	-	X	X	-	X	?	-	-	-	-	?	?	-	-	?

Sustainability commentary

This is a small site allocated on the eastern edge of Wyesham a suburb of Monmouth. The site is greenfield but of poor agricultural land quality. Other potential natural environment impacts include proximity to a SSSI, it contains part of a SINC (Site of Importance for Nature conservation) and there is an adjacent SINC also. Biodiversity assessment identifies the nature conservation value as high. There is therefore high potential for harm to biodiversity assets, clear evidence through ecological survey will be required to demonstrate the need for development outweighs harm to nature conservation assets. Mitigation will be essential to compensate for any biodiversity loss.

The site is adjacent to the Wye Valley AONB and the site is on a prominent steep slop forming the eastern edge of the settlements. Landscape appraisal identifies that development has the potential to have a significant impact. The site is also in an Area of Outstanding Historic Interest, and development is likely to harm this.

The location of the site is relatively far from a main village/town centre, and the dual carriage way A40 separates this part of the urban area from Monmouth. The A40 has limited crossing points meaning accessibility is only limited. The site does have a good bus service with a nearby bus stop, there is also a convenience shop within 400m and a supermarket, school and pub under 1km away. There are employment areas near the site.

Development proposed at this site is for low densities. Lower densities are likely to be less sustainable, making poor use of greenfield land and making neighbourhoods less walkable. If densities are low as only part of the site is suitable for development based on landscape and biodiversity impacts this should be noted in the policy, and criteria for their protection set out.

The policy also is very specific in requiring one dwelling to be a special care facility. Providing special care housing will help meet people's accommodation needs. However, nowhere else in the plan are special care housing needs referred to and if there may be a similar need in other parts of the County that is not being given similar prominence. .

This policy is handled differently than the other Monmouth site and appears only to be in the plan as a remnant of the UDP.

Main impacts / mitigation / recommendations

- The policy could be written in a similar way to the other Monmouth site.

- The policy may have an adverse impact on a locally designated nature conservation site.
- There is a risk that development of this site would have significant adverse landscape impacts and impacts on the historic landscape. A landscape buffer should help reduce the impacts of development.
- Development of the site needs to make sure it links to pedestrian routes and cycle ways to provide no car access to the services of Monmouth.

Policy SAH7 – Rural secondary settlements

This policy sets out three development sites for housing in the rural secondary settlements. The sites are for 20 dwellings in Usk, 45 dwellings in Raglan and 45 dwellings in Penperlleni.

Site	Accs	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
H7(i)	?	●	-	?	?	X	-	-	?	-	-	●	-	?	-	X	-	?
H7(ii)	●	●	-	?	?	X	?	?	?	-	-	?	-	?	-	X	-	?
H7(iii)	?	●	-	?	?	X	-	-	?	-	-	-	-	?	-	X	-	?

Sustainability commentary

These are sites on the periphery of three 'Rural Secondary Settlements' and are allocated for single use as residential development. All three allocations are at the lower end of density requirements. Higher density neighbourhoods can also encourage greater amounts of community interaction and support development of cohesive communities.

H7(i) Usk site: This site is quite accessible to services with a range of shops etc in 800m. The site is also close to a bus stop. However, the site is quite peripheral to the village in an area characterised as residential, there are few nearby employment opportunities. The site has biodiversity potential and this may need investigation and management prior to any development. The site also is in an area of high quality landscape and as landscape assessments identify there could be adverse impacts of development, these would require mitigation.

H7(ii) Raglan site This is a natural infill site for Raglan extending the village to the south east. The site has good access to all the goods and services of central Raglan, and buses connect the village to larger nearby towns, although there are only around 12 services a day. Within the village are essential shops, surgery, pubs and community centre. The site is adjacent to a junior school. However, there is little employment in the village, and the majority of workforce will have to leave the area for work. The site is moderate quality agricultural land that would be lost to development. A main constraint on development is the landscape quality, with the landscape sensitive to change. Elements of landscape must

be retained such as watercourse characteristics. Development will also need to respect the setting of the nearby Conservation Area.

H2(iii) Penperlleni site This site extends Penperlleni to the south. It is quite separated from the village by the playing fields. The site is greenfield land of moderate agricultural quality. The site has moderate accessibility to services as the village has only essential services, there is a convenience store about 400m from the site, a school adjacent to the site and in about 1km there is a community hall, doctors and recreational open space. A bus service links to Abergavenny and Cwmbran for other services. There is very limited employment in the area and the majority of new residents would have to travel outside the village for work. The site is of high/medium landscape sensitivity as it is part of rising countryside. However, the site is well contained by the A4042 and the railway line. Landscaping and retention of key features would be essential to protect the character of the area.

Main impacts / mitigation / recommendations

- The policy could reflect the specific needs of the sites and considerations for development, such as landscape or biodiversity. This could be reflected in the policy or more detail in supporting text.
- Densities should be at least 30dph on all sites. If the whole site is not to be allocated for housing then the site boundaries (and site area) should be changed.
- Access by non-car modes to these sites will be essential, there is limited employment availability in all these villages and connections will need to be secured to nearby employment areas. This will be particularly important to ensure new development does not create rural isolation.

Policy SAH8 – Main villages

This policy allocates seventeen housing sites in the villages of Monmouthshire. None of the sites are allocated for more than 15 dwellings, and are all single use allocations.

Site	Accs	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
H8(i) (a,b,c)	x	•	?	?	?	?	-	-	?	-	-	-	-	x	-	x	-	?

H8i(a), (b) Cross Ash: These are all greenfield sites. The greatest impact of development on these sites is on accessibility and landscape. The village has few services, although it does have a school, it does have a very limited bus service for essential connections. Therefore, development will give rise to increased car use and may adversely impact on those who do not or cannot drive. The landscape is of a high/medium sensitivity, landscape features such as tree belts must be retained to help protect character.

H8(ii)	?	•	?	?	?	?	-	-	?	-	-	-	-	x	-	?	-	?
<p>H8ii Devauden: This is a greenfield site on the southern village boundary. The village has some local services such as a pub and shop, but no school. However, there is a regular bus service to Chepstow and Monmouth. Therefore, accessibility of housing to services in this village is quite good. There are potential adverse impacts of development of this site on landscape, retention and improvements to existing hedgerows and tree cover and location of development on the site could help accommodate growth within the landscape and reduce adverse visual impacts. There is potential for important biodiversity on the site and further investigation may be required.</p>																		
H8(iii)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8iii Dingestow: This greenfield site is physically separate from the rest of the village and there is a need to ensure new development is integrated into the community. The village has a regular bus services linking to Abergavenny and Monmouth, allowing access to employment and a wider range of services. There is also a nearby shop selling essential goods. There are also other village services such as pub and village hall, although no schools. The site is near the church and the castle and Dingestow Court, however, the site is quite self-contained in the landscape and impacts on the setting of these historic heritage features will be limited.</p>																		
H8(iv)	x	•	?	?	?	?	?	?	?	-	-	-	-	x	-	x	-	?
<p>H8iv Grosmont: This site naturally extends the village to the west, it is greenfield site. The greatest impact of development of this site is on accessibility and landscape. The village has a few services, including a pub and village hall, it has no school. There is also only a very limited bus service. Therefore, development in this location is very likely to increase car use and may result in some isolation for those who do not (or cannot) drive. The site also has medium landscape sensitivity, landscape features such as hedges. The site is also near built and heritage assets, including a conservation area and Grosmont Castle SAM, and these will need to be taken into account in the design of new development.</p>																		
H8(v)	?	•	?	?	?	?	-	-	-	-	-	-	-	x	-	?	-	?
<p>H8v Little Mill: This site is greenfield agricultural land. Accessibility of new homes to services is quite good, although there is no shop in the village and no school. However, there is a pub and village hall. A good bus service also links to the Chepstow, Usk, Pontypool and Cwmbran. Therefore, the village has access to a range of services in these villages/towns as well as employment opportunities. Compared to some village sites the landscape impacts of site development should be less.</p>																		
H8(vi)	x	•	?	?	?	x	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8vi Llanddewi Rhydderch: This is a small greenfield site allocated for five homes on the northern edge of a very small village. The village has</p>																		

very few services, with no shop, school or pub and only a village hall. Bus services are also poor, with no regular service. Residents here will be reliant on using their car, raising the risk of rural isolation for those who do not or cannot drive. Landscape is also of medium sensitivity, however, scattered buildings in the area already detract from the character.

H8(vii)	?	•	?	?	?	?	-	?	?	-	-	-	-	x	-	?	-	?
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H8vii Llandogo: This is a site to the north east of the sprawling village of Llandogo, along the A466. The site is greenfield agricultural land. The site is about 0.5km from a local convenience shop and under 1km from the primary school, a pub and village hall. There are good bus links to Monmouth and Chepstow, providing access to employment and a range of services. There may need to be improvements to footpaths and cycle ways to ensure safe access along the A466. The site is quite near sites designated for nature conservation interest and this may need to be taken into account in access and design. There may also be landscape and heritage impacts of development that need to be mitigated against. The site is in the Wye Valley AONB, however, the site is quite self-contained so long as existing treed boundaries are maintained. The site is also near the Wye Valley Historic Landscape and there may be a need to evaluate archeologically interest of the site to avoid impacts. Design will need to respect the position within the conservation area.

H8(viii)	?	?	?	?	?	?	-	?	?	-	-	-	-	x	-	?	-	?
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H8viii Llanellen: This is a relatively large greenfield site to the north of the village of Llanellen. Accessibility is relatively good with a regular bus service linking to Abergavenny as well as Newport and Cardiff, giving access to a range of jobs and services. The site is also near a local convenience shop and there is a village hall and café. There are no schools. Risks to biodiversity also need to be a consideration of site design, as the River Usk internationally designated SAC is under 200m from the site. Landscape impacts are also a consideration as the Brecon Beacons National Park is also under 200m away. The character of the area is prominent pastoral slopes and parts are highly visible, however, parts of the site could accommodate development, subject to mitigation. There is also the potential for archaeological heritage at the site, mitigation is necessary to avoid adverse impacts.

H8(ix)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
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H8ix Llangybi: This is a greenfield site on the south western edge of the village. Accessibility is relatively good with a regular bus service linking to Usk and the site is also on a bus route between Newport and Monmouth, providing access to a range of jobs and services. The site is near a local convenience shop and village hall. However, schools are over 5km away. Development of this steeply rising site could have an adverse impact on landscape character and impacts would need to be mitigated against through design and landscaping.

H8(x) (a+b)	?	•	?	?	?	?	-	?	?	-	-	-	-	x	-	?	-	?
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H8x (a + b) Llanishen: These are two agricultural greenfield sites in the southern part of the very small village of Llanishen. The sites have access to a nearby village shop in petrol filling station, as well as a pub and village hall. The nearest school is over 3km away. However, there is a scheduled bus service although there are only six services a day this may help prevent total rural isolation. The sites have biodiversity potential that needs to be a consideration of design. There is also the potential for landscape impacts as both sites are in the AONB and the landscape would be quite sensitive to change. However, the location of the sites in the village, particularly Carpenter's Arms, represents limited infill only. The site on Church Road may need further investigation for archaeological potential and suitable mitigation prior to any development taking place.

H8(xi)	x	•	?	?	?	?	-	?	?	-	-	-	-	x	-	x	-	?
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H8 xi Llanfair Kilgeddin: This is an agricultural greenfield site for five new homes on the northern edge of the very small village of Llanfair Kilgeddin, even five new homes could have an impact on the community character of this village due to its current size. Accessibility of new homes to services is very limited, although there is a school in the village. Under 2km away is a pub and village hall. There are no scheduled bus services although the community bus can stop in the village. New development will be reliant on car use and risks creating areas of rural isolation. The biodiversity impacts of development will also need to be a consideration of site design and development, with the River Usk SAC nearby. The site is of high landscape quality but could accommodate development subject to suitable mitigation. The design of development would also need to respect the setting of the St Mary's Yard Castle Mound SAM that is around 250m from the site.

H8(xii)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
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H8 xii Mathern: This site is a large plot of agricultural land on the western boundary of the village. The village has some local services with shops selling essential produce within 800m. There is also a pub in the village, although schools are over 2km from the site. However, the village is well linked by bus to nearby towns and larger villages, including Newport. Therefore, the village has non car access to a range of employment and services. The site is in a 'green wedge' although this is not a quality designation the landscape assessment identifies that part of the site is suitable for development. Development will also need to take into account the adjacent Conservation Area and Grade II* listed buildings and protect the setting of these assets.

H8 (xiii)	x	•	?	?	?	?	-	-	?	-	-	-	-	?	-	x	-	?
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H8 xiii Penallt: This site is part brownfield on the southern edge of the village of Penallt, and is allocated for 10 dwellings. The site has poor accessibility to local services with no local shop. There is a village hall within 1km but no nearby schools. The village has a scheduled bus, but there are only five services a day. Housing development in this location risks creating rural isolation as car travel is the only real option from this site to access a range of services and employment. There is the potential for protected species on this site and assessment and mitigation will be necessary as part of site development. The site is also in the Wye Valley AONB, although landscape impacts can be mitigated against as the site is not steeply sloping and development can be well contained.

H8(xiv)	?	•	?	x	?	?	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8 xiv Pwllmeyric: This is a greenfield site on the north eastern boundary of the village, allocated for 15 new homes. Within the village and near the site there are few services, a Garden Centre and Farm Shop does provide some day to day supplies. However, the bus services are good with regular links to Newport, Chepstow and other villages. Therefore, there is non-car access from the site. Lack of community focal points within the village may mean this is a commuter village with little cohesive character, that may be made worse by new development. The landscape in the area is sensitive but there is capacity for growth. However, development will need to avoid impacts on the Mounton House Historic Garden and conservation area and include appropriate site layout, design and landscaping. A footpath runs through the site this will need to be maintained.</p>																		
H8(xv) (a+b)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8 xv (a+b) Shirenewton These are two adjacent greenfield sites on the eastern edge of Shirenewton. The village has some local services including a school within 1km, pubs and a public hall, however, there is no shop. There is a bus service close to the site but there are only limited services. Therefore, new housing is likely to mainly be reliant on car use to access most services, but buses and community services prevent total rural isolation. Landscape assessment identifies the sites have a low capacity for development as they are on a prominent ridge, to avoid adverse impacts landscaping, site layout and good design will be needed. This is also necessary to avoid adverse impact on the nearby conservation area. The site will also need further investigation for archaeological potential and suitable mitigation prior to any development taking place.</p>																		
H8(xvi)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8 xvi Trellech: This is a large greenfield site to the north of Trellech village. The village has some local services including an adjacent school, pubs, doctors and a public hall, however, there is no shop. There is a bus service close to the site but there are only limited services. Therefore, new housing is likely to mainly be reliant on car use to access most services, but buses and community services prevent total rural isolation. New walking and cycling links to the village centre will be necessary to improve access. The site is in the Wye Valley AONB and there is potential for landscape impacts as it would be noticeable in views from the east and west. The site also has archaeological potential and is very near a Conservation Area. Development would therefore need to be designed and laid out on the site to minimise landscape impacts and the setting of the Conservation Area, this will need to include protection of existing boundary features.</p>																		
H8 (xvii)	?	•	?	?	?	?	?	?	?	-	-	-	-	x	-	?	-	?
<p>H8 xvii Werngifford, Pandy: This is a site disconnected from the main village by an area that needs to be retained as public open space. The site is currently greenfield agricultural land. The village lacks some character and is relatively newly built housing estate, new development may further</p>																		

detract from the character of the area. There is a school adjacent to the site and a pub and public hall within 1km. However, there is no real shop in the village and only limited bus services. The location means that car use will be favoured for access to most services and jobs. Landscape impacts of site development will need to be mitigated against as it directly adjacent to the National Park, although suitable design and landscaping should mean that significant impacts can be mitigated against. Landscaping and design will also be needed to avoid impacts on the setting of the nearby Tramway Embankment Scheduled Ancient Monument. In addition, contamination impacts may need to be considered as part of the site is filled ground.

Sustainability commentary

Common characteristics of many of the sites are the lack of a range of services and employment. Those villages with a good bus service have greater potential to provide more sustainable housing sites, as it allows everyone to have access services. However, development will inevitably mean more car travel as it is the only really viable way of getting around the rural area, but at least bus services will prevent total rural isolation for those who do not (or cannot) drive. Those most at risk include those who are not able to afford to run one or more cars. For many rural households a car for each adult may be necessary. Most at risk from rural isolation are people responsible for looking after young children, young people and the elderly.

The landscape quality of many sites is also high, and suitable mitigation and retention of features should help make sure that impacts are not significant.

Two sites have particular constraints noted as part of the policy. However, it is evident that other sites have similar constraints on development and this is not mentioned in policy. Wherever particular issues need to be addressed in the design and layout of development to mitigate adverse impacts these should be noted in a similar way.

In some villages also the scale of housing proposed may have an impact on community character, for instance Cross Ash could grow significantly. Managing development well, for instance appropriate phasing, could help improve community cohesion by bringing new people into the area.

In some villages many sites have been promoted and only one or two selected for development. The site assessment process carried out by the Council was used to make sure the most suitable sites were selected for development, based on the impacts on the natural environment, size, relationship to the existing settlement and other issue such as access and safety.

Main impacts / mitigation / recommendations

- The policy could reflect the specific needs of the sites and considerations for development, such as landscape or biodiversity. This could be reflected uniformly in policy or more detail in supporting text. Currently only two sites refer to specific development criteria.
- Access by non-car modes to these sites will be essential, there is limited employment availability in all these villages and connections will be need to be secured to nearby employment areas. This will be particularly important to ensure new development does not create rural isolation.
- The Council will need to be clear on why these are the chosen sites to be able to defend them at examination and ensure the most

sustainable sites are allocated in the LDP, and prevent additional unwanted windfall development.

Policy SAT1 - Tourism

The policy sets four allocations for tourism development in the County. These are all for new hotels.

Site	Accs	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
NA	?	-	-	-	?	?	?	●	-	-	-	-	-	?	-	●	●	?

Sustainability commentary

Increasing the range and quality of overnight accommodation in the County can have benefits for sustainable tourism. Overnight visitors are likely to spend more during their visit, without creating extra car travel; there will be positive economic impacts. Hotels in more rural locations can also provide local employment for rural communities. Wherever possible there should be public transport access to these hotels.

All development will need to ensure the quality of the historic and built environment is protected (internally and externally), for example new build at Hendre Mansion and Croft-y-Bwla needs to respect the character of the houses.

The redevelopment of Piercefield House, Chepstow could have significant benefits for the long-term conservation of this derelict building. Redevelopment of the house must not impact on the public's enjoyment of the estate park and gardens.

Three of the four allocations are in or around Monmouth. Hotels are proposed at both Croft-y-Bwla and Hendre Mansion. Therefore, it is unlikely that both sites would come forward for tourism development. These are allocations, however, there is no certainty that they would come forward for development.

The impacts on individual proposals will have different impacts on biodiversity and landscape and will depend on the location.

Main impacts / mitigation / recommendations

- Redevelopment and conversion of historic buildings needs to ensure the character is maintained or enhanced and new buildings respect the setting.
- Redevelopment of Piercefield House should ensure public access is maintained to the grounds.
- Some additional supporting text would be useful to describe these allocations, for instance what type of accommodation is suitable and evidence of deliverability for these uses.

Policy SAW1 – Identified potential waste management sites

This policy identifies seven sites that have the potential for waste management facilities, six are under 4ha but there is only 19.2ha site at Quaypoint, Magor.

Site	Accs	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
W1b	●	-	●	-	?	?	-	-	-	?	-	-	●	x	?	?	?	?
W1d	●	-	?	?	?	?	-	-	-	?	-	-	●	x	?	?	?	?
W1e	●	-	●	-	●	●	-	-	-	?	-	?	●	●	?	?	?	?
W1f	●	-	?	-	?	?	-	-	-	?	-	?	●	x	?	?	?	?
W1(i)	●	-	-	-	?	●	-	?	-	?	-	-	●	●	?	?	?	?
W1(ii)	●	-	-	-	-	?	-	-	-	?	-	-	●	●	?	?	?	?

Sustainability commentary

These sites have been broadly assessed for their suitability for waste management. However, there is no certainty that waste facility planning applications will be granted permission. Further detail will be needed at application stage on the type of waste management and site suitability. To be allocated the sites should have been tested for suitability, so planning applications for waste management would be suitable, with the only matters remaining to be verified through a planning application being the type of facility and the detailed design and operational conditions for its operation. The policy may therefore need to provide more certainty that these sites are suitable.

All sites will need to be assessed to ensure that waste management facilities proposed would not cause unacceptable pollution impacts, particularly on water and air quality.

All the proposals are for in-building waste management, this will reduce the impacts of this type of facility, but may harm the overall strategy for sustainable waste management. It may be required that some elements of facilities are outdoor, such as storage of waste or end products.

The small sites are throughout the County and should help meet the sustainable waste management principle of proximity, that seeks to make sure waste is not transported a long distance prior to treatment.

W1b Quay Point, Magor: This is a large greenfield site in a strategic location south of the M4 at Magor. Development would have an impact on

the character of the area, however, it already is an allocation in the UDP. Development would need to take into account the need to avoid biodiversity impacts. Development would also need to be well designed and laid out on site to minimise landscape impacts, as it is visible from the surrounding countryside. Landscaping would need to include tree belts using locally appropriate species. Access to the site is good and does not require passing existing residential properties, therefore, helping to protect residential amenity.

W1d Westgate Business Park, Llanfoist: This is a greenfield site on the edge of Llanfoist. It has good connections to the main highway network near a junction on the A465. Parts of the site are near residential development therefore development needs to be organised on-site to avoid any amenity impacts to these homes. This will include noise impacts from vehicle movements and protection from litter or odour effects.

W1e Ross Road, Abergavenny: The site has quite good access to the A465 without passing through residential areas. The site is previously developed and although in an area of high quality landscape is relatively well screened from the surrounding areas by existing tree boundaries and the railway line. Development is well away from residential areas so impacts on existing residents will be minimal. The site is not far from the river and development will need to ensure that construction and operation of the facility does not harm the water environment.

W1f Newhouse Farm, Chepstow: This site is a greenfield area on the very southern edge of Chepstow south of Junction 2 of the M4. The site is not far from the river and development will need to ensure that construction and operation of the facility does not harm the water environment. The site is also very near internationally protected nature conservation sites and it will need to be verified that the use of this greenfield land will not adversely impact on the integrity of these sites. The development is a long way from existing residential development and traffic can access the site without passing any homes. Therefore, the impact of development on residential amenity will be minimal.

W1(i) Five Lanes, Caerwent This is a former quarry in the open countryside west of Caerwent. It is some distance from the village and the Roman town. However, care will need to be taken to ensure development in no way harms the remains of the Roman settlement. The site is well connected on A48 and access is possible without the need to pass residential properties. The site is an existing quarry and therefore may be suitable for outdoor facilities, including composting. The policy should recognise the potential of this site.

W1(ii) Llanfoist, Civic and Transfer Station: This is a partially developed site, already in use for waste management and a former tip, it is east of Llanfoist. The site is physically separated from the urban area, with good access, therefore there are no impacts on residential amenity from operation or transport. The site is near the River Usk SAC and therefore development and operation of the site will need to demonstrate that it will not harm the integrity of this site. The area is quite visible due to the flat character of the land in this location, improved boundary treatment will be needed to reduce the impact of development.

Main impacts / mitigation / recommendations

- Any development that is for gasification or incineration of waste should guarantee energy recovery and where possible power generation. An identified user of power should be identified.
- Some of the sites are near sensitive areas designated for their international importance for nature conservation protection, and it will be essential that operation and construction does not harm these areas, including from impacts from litter, dust, and light.
- Consideration should be given to allowing at least part of the use on each site to be outdoor, Five Lanes may be particularly suitable for

open windrow composting.

- Most of these sites can be accessed by HGV without the need to go past residential properties, sites that involve disturbance to local people from frequent traffic movements should be avoided.
- Due to the scale of buildings needed to accommodate many types of waste handling facility care needs to be taken to ensure that new buildings are of a good design quality. Sites must also have good quality screening using locally appropriate trees and shrubs.

Policy SAE1 – Identified industrial and business sites

This policy identifies ten sites that have the potential for industrial and/or business development throughout the County.

Site	Accs	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
E1a	?	-	?	-	?	?	-	-	?	?	-	-	-	X	-	●	●	?
E1b	?	-	?	-	?	?	-	-	?	?	-	-	-	X	-	●	●	?
E1c	?	-	?	-	?/x	?	-	-	?	?	-	?	-	X	-	●	●	?
E1d	●	-	?	?	?	?	-	-	?	?	-	-	-	X	-	●	●	?
E1e	?	-	?	?	?	?	-	-	?	?	-	?	-	●	-	●	●	?
E1f	?	-	?	-	?	?	-	-	?	?	-	?	-	X	-	●	●	?
E1g	?	-	?	?	?/x	-	-	-	?	?	-	?	-	?	-	●	●	?
E1h	●	-	?	?	?	?	?	?	?	?	-	-	-	?	-	●	●	●
E1i	●	-	?	?	?	?	-	-	?	?	-	-	-	?	-	●	●	●
E1j	?	-	?	?	-	-	-	-	?	?	-	-	-	?	-	●	●	?

Sustainability commentary

Securing new employment land is essential in supporting the economy of the County. However, the majority of new growth is within the M4 corridor predominantly around Magor. There are limited allocations in other parts of the County, with only limited supply in Abergavenny and Chepstow.

Several of the sites are large and will have an impact on the landscape. Every attempt needs to be made to minimise the significance of these impacts, including landscape planting making use of species found naturally in the area. The quality of new buildings also should be a consideration of development, as the normal corrugated grey box style of much employment development will not be suitable in all allocated locations.

E1a Wales One, Magor (west) This is a greenfield site situated directly south of the M4 junction at Magor. Development would impact on the character of the area although this is not likely to be significant due to the already urbanised nature of the area. Access to the site is good and does not require passing existing residential properties, therefore, helping to protect residential amenity.

E1b Quay Point, Magor: This is a large greenfield site in a strategic location south of the M4 at Magor. Development would have an impact on the character of the area, however, it already is an allocation in the UDP. Development would need to avoid biodiversity impacts. Development would also need to be well designed and laid out on site to minimise landscape impacts, as it is visible from the surrounding countryside. Landscaping would need to include tree belts using locally appropriate species. Access to the site is good and does not require passing existing residential properties, therefore, helping to protect residential amenity.

E1c Gwent Europark, Magor: This is another large greenfield development site at Magor. This is an area of very open landscape character with good biodiversity potential as the site is criss-crossed by drainage ditches. It will be essential that landscape planting making use of locally appropriate species helps in protecting the character of the environment here, ecological assessment is also likely to be required and adverse impacts avoided. Access to the site is good and does not require passing existing residential properties, therefore, helping to protect residential amenity.

E1d Westgate Business Park, Llanfoist: This is a greenfield site on the edge of Llanfoist. It has good connections to the main highway network near a junction on the A465. Parts of the site are near residential development therefore development needs to be organised on-site to avoid any amenity impacts to these homes. Access to the site is good and does not require passing existing residential properties, therefore, helping to protect residential amenity. The site also provides a useful employment resource in the northern part of the County, helping to make Abergavenny/Llanfoist more self-contained in terms of access to employment.

E1e Ross Road, Abergavenny: The site has quite good access to the A465 without passing through residential areas. The site is previously developed and although in an area of high quality landscape is relatively well screened from the surrounding areas by existing tree boundaries and the railway line. Development is well away from residential areas so impacts on existing residents will be minimal. The site is not far from the river and development will need to ensure that construction and operation of the facility does not harm the water environment.

E1f Newhouse Farm, Chepstow: This site is a greenfield area on the very southern edge of Chepstow south of Junction 2 of the M4. The site is not far from the river and development will need to ensure that construction and operation of the facility does not harm the water environment.

The site is also very near internationally protected nature conservation sites and it will need to be verified that the use of this greenfield land will not adversely impact on the integrity of these sites. The development is a long way from existing residential development and traffic can access the site without passing any homes. Therefore, the impact of development on residential amenity will be minimal.

E1g South Woodside, Usk: This site is on the opposite bank of the River Usk from the main village and is currently used for the storage of vehicles. The site is already well-screened from the surrounding area and development would have limited impact on the natural environment if boundaries are retained. In addition, construction and operation of the site will need to ensure no significant harm is caused the adjacent River Usk SAC, as required by the policy. The site may result in some traffic disturbance to nearby properties, although the site is small meaning the scale of new business will also be small. The sites offers a good opportunity for more accessible local employment in the village, and is positive in terms of creating sustainable communities.

E1h Pill Row, Severnbridge IE, Caldicot: This is a small, currently undeveloped, site in central Caldicot. The site is adjacent to the existing industrial estate. The location is well suited to high trip generating uses such as office development, and could be reserved for such. Development here is also not far for the historic and built assets of central Caldicot including the castle. New development should help improve the quality of the built environment at this location, with a design that compliments the location. The site borders on a stream and this must be protected from harm.

E1i Severnbridge Central, Caldicot: The sustainability issues in the development of this site are similar to E1h, although the site is previously developed. The site is less visible from the central area therefore less emphasis needs to be given to built environment quality. The site is also in the centre of the Industrial Estate and therefore could be used for more industrial types of employment than E1h.

E1h Beaufort Park, Chepstow: This is the last remaining part of an allocated employment site. The site is already surrounded by new commercial development and presents an opportunity to provide new employment in the town where space for such sites is very limited. The site has good access off the M4, although is quite distant to the centre of the town. Landscape and biodiversity impacts of development of this site are likely to be minimal.

Main impacts / mitigation / recommendations

- Many of the Magor sites are near areas designated for the national or international importance for nature conservation. It will be essential that it can be demonstrated that development of these sites would not have a significant adverse impact on the conservation objectives of these sites, either individually or cumulatively.
- All employment sites must include good access by non-car modes of transport, this must include regular scheduled bus services, as well as high quality pedestrian and cycle links from nearby residential areas and town centres.
- Sites in the town centres could be reserved for high trip generating uses, such as E1h in Caldicot which is well located for office type development, with relatively good access from the station.

Policy SAE2 – Identified mixed use sites

This policy identifies the three mixed use employment and housing sites. These sites are all strategic sites identified in policies SAH3, SAH4 and SAH5.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	?	?	?	?	?	?	?	-	?	-	?	?	•	•	?

Sustainability commentary

Mixed use development can help deliver more sustainable communities, allowing people to have access to local employment and reducing the need to travel. Clearly not all new residents will work in associated employment sites, however, it sets a pattern of development compatible with making a sustainable places now and in the long-term. However, it will be important to ensure that employment development does not harm the quality of life for new or existing residents. Development therefore needs to be compatible with the location, and possibly have different road access routes to reduce the impact of traffic movements.

The sustainability assessment of these individual sites is addressed in policy appraisal of SAH3, SAH4 and SAH5.

Main impacts / mitigation / recommendations

- Mixed use sites could also incorporate an element of new community facilities, policies could refer to the type of provision needed.
- See policy appraisal of SAH3, SAH4 and SAH5 for further details.

Policy SAE3 – Protected employment sites

This policy lists the 24 employment sites in the County that will be protected for B1, B2 and B8 uses.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	?	?	?	?	?	?	?	-	?	-	•	?	•	•	?

Sustainability commentary

Protection of existing employment sites is essential to ensure the continued availability of jobs in the County. There may be pressure for a change of use of some sites as market value for housing will be higher. The sites are not assessed individually as they already are in operation and the

LDP can not manage their impacts. However, where a new planning application is received for employment development this will need to be assessed against national and LDP policy.

Protection of employment in parts of the County with very restricted land availability is essential. For instance in Chepstow, Abergavenny and Monmouth.

Main impacts / mitigation / recommendations

- This policy should help protect jobs and the economy of the County.

Appendix 6

Sustainability appraisal of development management policies

Building sustainable communities

Policy H1 – Residential Development in Main Towns, Severnside Settlements and Primary Rural Settlements

Policy H2 – Residential Development in Main Villages

These policies permit the development of new housing within settlement boundaries, subject to several policy caveats.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	●	?	●	?	?	?	?	●	-	?	-	-	?	-	-	-	?

Sustainability commentary

Focusing new residential development within urban areas is an essential part of making sure that new homes have good access to services. This policy would see new homes within settlement boundaries in line with the strategic policies.

Main impacts / mitigation / recommendations

- These policies makes clear that development for housing will be permitted in villages and towns listed in the strategic policies.
- These policies could be incorporated into a strategic policy for the distribution of development to help in providing a clear LDP strategy.
- Policy rewording, or setting out the policy as bullet points, may improve its readability.

Policy H3 – Residential Development in Minor Villages

This policy sets the principles for development in Minor Villages. The policy limits development to single or double plot sites and sets criteria for development.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
x	●	?	●	?	?	?	?	?	-	-	-	-	●	-	-	?	?

Sustainability commentary

The control of development in these small villages is essential as they have a low level of services, development here is not compatible with a sustainability spatial strategy. A limited quantity of development may help in meeting local housing needs, and will aid in the delivery of affordable homes.

Clarification could also help the policy such as if other types of gap site are permitted for development, or only between existing dwellings. Policy rewording, or setting out the policy as bullet points, may improve its readability.

Main impacts / mitigation / recommendations

- Policy rewording, or setting out the policy as bullet points, may improve its readability.
- Some wording clarification may be necessary to help implement the policy, such as how developers will demonstrate that larger development is suitable and that there is not harm to village form.

Policy H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use

Policy H6 – Extension of Rural Dwellings

These policies provide the criteria for bringing buildings in the countryside into residential use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	•	?	•	?	•	•	•	-	?	?	?	?	•	?	?	?	-

Sustainability commentary

There is a great pressure for residential development in the re-use of existing buildings and extensions of existing properties in the countryside. It is important to protect the countryside and landscape from development impact, through careful design.

It is recognised in the spatial strategy that the majority of development should be directed to the main towns and then smaller amounts of development to the smaller villages. Residential development in these locations mean people are living long distances from services and more than likely reliant on the use of a car, therefore increasing air pollution and climate change impacts. This policy should make clear if it refers only to housing or includes other types of development.

Main impacts / mitigation / recommendations

- Protection of the countryside and landscape from development could be covered in one policy and not split between different types of development which might occur in the countryside. This could include protection of landscape and setting, ensuring bulk and size of development is suitable, materials etc. Design of buildings could be covered in another generic policy relating to all developments across the whole County. This would mean all other policies would not need to set out any landscape protection or design criteria.
- The policy should state clearly what is acceptable in terms of the re-use of newer buildings in the open countryside to residential use.
- Policy H4 does have a lot in common with policy RE2 and the policies could have been merged. However, the separation of residential and employment policies may help users of the plan navigate to those matters of interest to specific types of development.

Policy H5 – Replacement Dwellings in the Open Countryside

This policy lists the criteria to be able to replace a dwelling in the open countryside.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	•	?	•	?	•	•	?	?	?	?	?	?	•	?	-	-	?

Sustainability commentary

In a mainly rural area, it will be necessary to control the replacement of dwellings in the open countryside, to protect the countryside setting and local landscape impact, as well as control the size of the replacement dwelling.

This policy provides criteria to minimise any increase in size of a replacement dwelling, compared to the original building, as well as protecting the setting. The policy does not provide permission for the replacement of any traditional farmhouse, cottage or other building that is important to the visual and intrinsic character of the landscape. It also states planning permission will be granted provided the original dwelling 'has not been demolished, abandoned or fallen into such a state of disrepair so that it no longer has the appearance of a dwelling'. This protects the countryside from new residential properties in buildings that no longer appear as such in the landscape. The policy provides criteria for ancillary garage and storage space which is separate from the main residential property. This might provide for new additional buildings in the countryside, as the original dwelling may not have had any garage and storage buildings associated with the dwelling.

Controlling rural development will also help in securing objectives of reducing the need and distance people travel, and help to avoid exacerbating

issues of rural isolation.

Main impacts / mitigation / recommendations

- The associated SPG on replacement dwellings will help the implementation of the policy. The SPG provides additional detail and parameters for the type and scale of changes permitted.
- Supporting text for the policy would allow larger new dwellings to be built in the countryside where these relate to attracting inward economic investment. However, this may run contrary to achieving sustainable development principles related to achieving greater equality.

Policy H7 – Affordable Housing Rural Exceptions

This policy provides the criteria for providing 100% affordable housing schemes in the countryside.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	?	?	?	-	●	?	?	?	?	?	?	-	?	?	?	?

Sustainability commentary

Affordable housing rural exception schemes will be permitted in rural areas adjoining the Secondary Rural Settlements, Main Villages and Minor Villages. This is supported by national policy. The policy states that affordable housing in these locations will be for local need only which needs to be demonstrated. However, there is no advice or evidence relating to what is local need or what would be required in a 'properly conducted survey'.

A positive part of this policy is that it provides criteria to retain affordable housing for both initial and subsequent occupiers. It will also help to support more mixed communities in rural villages, that can become characterised by an aging population or a prevalence of holiday homes.

Rural affordable housing in very isolated villages should be limited, with increasing fuel prices and poor public transport services, this could result in rural isolation, difficulty accessing work and possible increase in financial hardships.

Main impacts / mitigation / recommendations

- It might be useful to provide information within the supporting text on defining local need. This would ensure that only local people in real need gain affordable homes in their local area. This could include details in an Affordable Housing SPG.
- This policy should be part of the strategic policy on affordable housing, and if it is necessary here it should ensure there is no overlap of criteria.

Policy H8 – Gypsy, Traveller and Travelling Showpeople Sites

This policy provides criteria against which applications for Gypsy, Traveller and Travelling Showpeople sites will be assessed.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	●	?	?	-	?	?	-	-	-	●	?	?	?	?	?	-

Sustainability commentary

Monmouthshire only have one authorised site and state they have a low population of Gypsy and Travellers, with only one planning application indicating a low need. There is no need for Travelling Showpeople Sites. However, the application and previous research into new sites has not come up with any suitable sites to become authorised. Therefore there is still a need for new sites. Any new applications would need to be assessed against this policy.

The policy provides straightforward criteria against which planning applications for both permanent and transit sites would need to be assessed, all of which seem reasonable. The policy does state that permanent sites need to be accessible to schools, shops and health care, by public transport, on foot or by cycle. It may not be possible to provide locations which are both accessible to services and do not impact on other uses. However, the location of pitch sites should aim for similar standards of accessibility as housing sites associated with identified Major and Minor villages.

Main impacts / mitigation / recommendations

- A number of policy criteria throughout the LDP relate to the protection of the countryside and landscape enhancement, these are already covered by other policies of the plan.

Policy H9 – Flat Conversions

This policy provides criteria for the conversion of houses into flats within development boundaries of towns and villages.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	•	?	•	?	?	•	•	?	?	-	?	?	?	?	?	?	?

Sustainability commentary

The conversion of houses into flats can have an impact on the amenity of adjacent properties, local traffic and the character of the local area.

It may not be necessary to have a design policy related specifically to this one type of development (flat conversions). All of these criteria (and others) could appear within a single design policy, which could relate to all types of development both within and outside development boundaries.

Policies should not be overly restrictively applied as flat conversions can have many sustainability benefits. These can include providing relatively affordable homes and making the best use of existing housing stock and efficient use of land.

Main impacts / mitigation / recommendations

- None.

Community and recreation facilities

Policy CRF 1 – Retention of Existing Community Facilities

This policy provides criteria for the change of use of existing community facilities to other uses.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	•	•	?	?	?	?	?	?	?	?	?	•	?	?	?	?

Sustainability commentary

There can be many pressures on existing community facility sites to be changed to other higher value uses, such as housing. Retaining existing community facilities is important in creating sustainable communities and reducing the need to travel, particularly in more rural locations of the County.

This policy recognises the need to retain existing community facilities, but also recognises that there may be situations when a change of use from a community facility to another use can be permitted. This requires stringent criteria to ensure that all possible ways have been made to either retain the service in the local area so that people do not have to drive, or ensure that, if commercially owned, to provide evidence that the facility is financially unviable and the facility has been properly marketed before allowing the reuse of a community facility. The supporting text makes clear that guidance on proving viability will be given by the planning authority. The standard of evidence required by the developer needs to be strict and robust, to ensure that as many community facilities as possible are retained. Once lost, it is very difficult to ever regain community facilities, particularly in more rural locations.

Main impacts / mitigation / recommendations

- The policy does state that evidence is required to prove a facility is not financially viable or that the facility has been genuinely been marketed. This should help protect this type of facility from loss.
- Some change to policy wording could help clarify its aims and controls.

Policy CRF 2 – Outdoor Recreation / Public Open Space and Allotment Standards and Provision

This policy sets out the amount of outdoor playing space, public open space and allotment space required for new development and seeks to secure their provision in conjunction with all new residential development.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	•	•	?	?	•	?	?	?	?	•	?	?	?	?	?	?

Sustainability commentary

This policy clearly sets out the amount of playing space, public open space and allotment space required per 1000 population. Assuming this relates to housing development, the policy does not state if this also relates to employment development, which might require public open space as well. It might be worth assessing whether public open space should apply to both housing and employment developments.

The supporting text links to the Open Space Study which details the quantity, quality and accessibility. Providing this type of evidence will help to provide the right type of space to the right areas.

Areas of public open space can make an important contribution to sustainable development in and near main towns. Some benefits for sustainable development from these spaces are:

- to provide locations for formal and informal recreation and play-space helping support healthy lifestyle choices
- contribution to the quality of the built environment, including bringing biodiversity into urban areas
- to provide community meeting spaces
- help mitigate urban heating effects of climate change
- space to grow food
- provide flood relief and natural water storage.

Main impacts / mitigation / recommendations

- This policy is essential in making high quality places to live with plentiful outdoor space to meet residents needs, there will be benefits in helping to support healthy lifestyle choices.

Policy CRF3 – Safeguarding Existing Recreational Facilities and Public Open Space

This policy provides criteria for permitting to loss of existing recreational and public open space.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	?	•	?	-	?	?	?	?	-	?	?	?	?

Sustainability commentary

The policy title is about safeguarding existing facilities and open space, but the policy wording relates to when it would be acceptable to loose these spaces.

Main impacts / mitigation / recommendations

- The policy should help in protecting existing sites from loss.

Policy RET1 – Primary Shopping Frontages

This policy provides criteria to retain a good mix of A1, A2 and A3 uses within Primary Shopping Frontages.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	?	•	?	?	?	?	?	?	?	?	•	?	?

Sustainability commentary

This policy will help manage the mix of retail within Primary Shopping Frontages in Abergavenny, Caldicot, Chepstow and Monmouth. It will ensure that not one type of A use dominates these main shopping areas, therefore providing a range of shops, professional services and café/restaurants in one location for local residents. This will help to retain the vitality of town centres in these locations.

The policy may need to have greater clarification in policy or supporting text. For example, to ensure that vitality is not harmed it may be useful to set out how this will be judged.

Retaining viable retail centres is essential for reducing the need to travel and maintaining town character. Only permitting change of use after a minimum two year vacancy will further help protect shopping frontages. This two year timeframe is important in the current recession where abnormal financial pressures have forced closures that would not be present in more stable economic times.,

Main impacts / mitigation / recommendations

- Supporting material may help implementation of the policy.
- The policy will help support the vitality of primary shopping frontages in the longer term.
- Preparation of an SPG showing standards for the percentage of non-A1 uses and what might constitute an ‘over-concentration’ will help to implement the policy.

Policy RET2 – Central Shopping Areas																	
Policy RET3 – Neighbourhood Centres																	
These policies set out criteria to protect A1, A2 and A3 uses within Central Shopping Areas.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Sustainability commentary																	
<p>The LDP has a role in maintaining vibrant, attractive and viable town centres, which provide a mix of retail uses and active frontages. The policy restricts development to A1, A2 and A3 uses and states where a change of use would be acceptable to residential, by demonstrating the business is unviable and has been vacant for 1 year and marketed sufficiently. This allows for sufficient time to ensure the business is not lost and is unviable.</p> <p>However, the policy does allow for the change of use from A1, A2 or A3 to another use if it can be demonstrated that the new use will attract new footfall. This may help preserve active uses in these locations, helping maintain vitality in areas where there may be insufficient demand for shopping / food and drink uses.</p> <p>Policy RET3 permits development in Neighbourhood Centres providing it does not impact on Town and Local Centres. The last two bullet points overlap with policy criteria in RET2.</p>																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> • The policies should help to support the continued viability of Central Shopping Areas and neighbourhood shopping centres. There will be a range of benefits for sustainable development, including reducing the need to travel by car and providing accessible local services. . 																	

Policy RET4 – New Retail Proposals

This policy provides a hierarchy of locations for new retail proposals.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	?	•	?	•	?	?	?	?	•	?	•	•	?

Sustainability commentary

National guidance sets out that town centres are the best location for new retail. This policy supports this guidance by directing any new development to CSAs first before considering edge-of-centre and out-of-town sites, if there are no suitable sites within the CSAs. This will help ensure that the most sustainable location for retail is obtained, within central locations which have the best access for public transport and therefore reduces the need to travel by car. It also ensures that the vitality and viability of main shopping areas are not impacted by other proposed shopping developments elsewhere in the same settlement.

It is up to the developer to prove there are no suitable sites when submitting an application outside a CSA. The policy provides the criteria against which retail development outside a CSA will be assessed. The policy criteria should also address accessibility considerations. Controlling the proliferation of out-of-town or very peripheral commercial development is essential for sustainable development. Locating these uses in peripheral locations can have adverse sustainability impacts, this will include increased car travel (these sites are almost always most easily accessed by car) development can also harm town centre viability where they provide services that would rival those in a town centre, often with cheaper parking.

Main impacts / mitigation / recommendations

- The policy needs to be strictly enforced to show absolutely no alternatives are available and there is a proven need for development, before development takes place in locations on the periphery or outside towns.

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Enterprise and employment

Policy E1 – Protection of Existing Employment Land																	
This policy safeguards B1, B2 and B8 employment land, providing criteria for exceptions to the protection of these sites.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	?	?	●	-	-	?	?	-	-	-	-	-	●	-	●	●	?
Sustainability commentary																	
<p>Employment sites should have good public transport links and be within key settlements to reduce the need to travel by car. Protection of existing employment sites is essential to protect jobs and the economy of the County. Particular care should be given to protecting employment where access to jobs is already limited and there are constraints on future employment land viability (or where little new employment land is allocated through this plan). In these locations existing employment sites may need to be more stringently safeguarded.</p> <p>This policy protects existing employment land (B1, B2 and B8 uses) and then provides criteria against which the change of use from employment to another use would be permitted. It is important to ensure that the information required and received is clear and robust, to ensure that employment is not lost in key locations.</p> <p>based on residential amenity considerations. Small industrial uses in otherwise more residential areas can provide an important local asset, helping people who live in towns easily access local businesses. These sites may also be local small businesses, and encouraging their closure, especially on rented sites, will be detrimental to the local economy and character of some areas. Applying residential amenity criteria will need to consider the benefits to local character of small employment areas, in addition to the impacts.</p>																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> Sites should only be permitted to change from employment to another use, after the Council have made a local and County wide assessment of employment provision, which ensures there is a wide and varied selection of employment choices. Some protection should be given to local industrial businesses that provide a local economic asset and service. If a business has been in the same use for a number of years then nearby residents will already be aware of its impacts and be living alongside them. 																	
Policy E2 – Non-Allocated Employment Sites																	
This policy provides for permitting non-allocated employment sites as long as they meet the criteria listed within the policy.																	

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	?	?	?	?	?	?	?	?	-	-	-	-	?	-	●	●	?

Sustainability commentary

The policy directs non-allocated employment sites to within or adjoining key settlements if there is a demonstrable need and there are no environmental and landscape impacts. This may have an adverse impact on the character of the countryside and the policy appears quite permissive of this type of development, including development outside town boundaries. This is perhaps contrary to the spatial strategy that would favour development within the defined settlement boundaries and protection of the countryside.

These new sites should have to demonstrate they are accessible by public transport, particularly where they would generate a large number of new jobs.

Development that would see a high concentration of new users, such as offices should be restricted from peripheral locations. Furthermore, development should have to show a sequential test has been followed and no alternative sites are available before permission is given for development in edge locations.

Main impacts / mitigation / recommendations

- The policy appears quite permissive of this type of development and this could have adverse impact on the natural and built environment
- The policy should ensure a sequential test is applied to employment development that would generate a large number of trips. Office development should be prioritised in town centres or in other locations with good public transport access. Particular controls should be put on any development that wishes to be located outside settlement boundaries.

Policy E3 – Working from Home

This policy provides criteria to allow change of use to working from home.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	?	?	?	?	?	?	●	?	?	?	?	●	?	●	●	?

Sustainability commentary

Allowing people to work from home or operate a small business from home contributes towards creating a sustainable community. It reduces the need to travel to work for the business owner and means that services are provided within very rural locations. However, businesses would need to be of a suitable scale to avoid creating unsustainable travel patterns of potential employees.

Policy E3 sets out criteria to protect the residential amenity and character of the area, which are important to protect if allowing working from home. However, it

is questionable as to whether this policy could be incorporated into other policies to make the plan more concise.

Main impacts / mitigation / recommendations

- Potentially, permitting working from home policy wording could be incorporated into another employment policy, with the protection of residential amenity and character of an area within a generic policy for design/amenity which would cover all types of development.

Policy RE 1 – Employment within Villages

This policy sets out that employment within and adjoining villages will be permitted.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	?	?	?	-	?	-	?	?	-	?	•	•	?

Sustainability commentary

Allowing people to work from village locations will contribute towards creating sustainable rural communities, providing jobs potentially for residents in rural locations. It means that services are provided within very rural locations and it reduces the need to travel by car if providing a service in villages.

. As stated in the policy development of employment uses in these locations need to carefully matched with the scale of the existing village and the type of jobs it would provide for the local areas. The policy requires that new village employment sites would need to draw from the local workforce - this is an important part of securing a sustainable rural economy providing accessible employment and one that does not give rise to a large number or long-distance commuting trips.

Main impacts / mitigation / recommendations

- Subject to the policy being successfully implemented it could help secure benefits for the rural economy and access to jobs for rural communities.

Policy RE2 Conversion or rehabilitation of buildings in the open countryside for employment use

This policy provides the criteria for bringing buildings in the countryside into employment use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	?	-	-	?	?	?	?	-	-	-	-	-	-	-	•	?	?

Sustainability commentary

This policy seeks to protect the countryside from inappropriate re-use of buildings for employment purposes. There will be benefits for the protection of the natural environment from making sure the type of building and the restoration does not harm landscape character.

Developing new employment uses in the countryside can also be a substantial benefit to the rural economy, particularly where it forms part of a farm diversification scheme, and helps farmers stay on the land. However, some types of employment development may not be suitable in rural locations and the LDP needs to make sure that new employment does not give rise to unsustainable commuting patterns or impacts on the character of an area. Therefore, some controls on the type of business may be suitable.

This policy contains similar criteria to several other policies of the LDP. Finding a new way of presenting these policies relating to re-use of rural buildings may help clarify the Council's position on this type schemes and avoid repetition in the plan. The Council could also consider if these buildings should be prioritised for economic use over residential re-use, to support the local economy rather than provide isolated new dwellings.

Main impacts / mitigation / recommendations

- The policy may need to be clear on what type of employment will be permitted in the open countryside, for instance if it should comply with similar policy criteria to RE1 on employment in villages.
- The importance of buildings in the countryside for wildlife could be referred to in the policy.

Policy RE3 – Agricultural Diversification

This policy supports the diversification of farms within the County.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	?	?	•	?	-	•	•	?	?	?	?	?	-	?	•	•	-

Sustainability commentary

Allowing for the diversification of farms is important in ensuring local farms remain viable and provide for the local rural economy, as long as the non-agricultural development is complementary to the farms activities. This is set out in the policy criteria.

The policy sets out the criteria for permitting new build if conversion or reuse of buildings is not possible. This seems to be robust criteria and allows farmers, in the right instances, to diversify the best way they can.

Main impacts / mitigation / recommendations

- This policy provides for the protection of the local character which is important in rural locations, which is positive in meeting sustainability objectives for

the protection of natural environment. Although, as stated for previous policies, this could be left to a generic landscape, design or re-use of buildings in the countryside policies, which would cover all land uses in both rural and urban locations.

Policy RE4 – New Agricultural and Forestry Buildings

Policy RE5 – Intensive Livestock / Free Range Poultry Units

These policies provide criteria relating to new agricultural and forestry buildings within the open countryside.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	●	?	?	-	-	?	?	-	?	-	?	?	-	?	●	●	-

Sustainability commentary

In a mainly rural County it is going to be important to gain the right balance for permitting agricultural and forestry type development against the need to maintain the countryside and local landscape character. Some of these buildings can be quite large scale and have a major impact on the local character. However, it is important to allow some of these developments to retain local rural economy in a mainly rural County.

to

building or access is reasonably required for agricultural or forestry purposes'. This is an important statement to ensure there is strict restrictions on development within the countryside. Determination on what is 'reasonably required' will be considered on a case-by-case basis.

Main impacts / mitigation / recommendations

- .

Policy RE6 – Provision of Recreation, Tourism and Leisure Facilities in the Open Countryside

This policy permits development in the countryside for low-key recreation, tourism and leisure facilities

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	?	●	●	-	-	?	?	-	?	-	?	?	?	?	●	●	-

Sustainability commentary

Allowing development to occur for recreation, tourism and leisure facilities in the countryside is important for a county which is mainly rural in nature. It provides for the local rural economy, as well as providing facilities which can contribute towards quality of life and local jobs.

This policy is for small-scale and informal recreation/tourism or leisure development. Buildings as part of the development should re-use or adapt existing buildings rather than new build. This is similar to other policies on development in the open countryside and as suggested for RE2 could be included in a single policy on development in the open countryside.

The supporting text states that development for organised recreational and sporting activities generate large volumes of people are likely to be intrusive, therefore require to be adjacent to other noisy uses and close to existing settlements. However, this type of scheme is not addressed through the policy.

Main impacts / mitigation / recommendations

- The policy should help support the rural economy by allowing suitable leisure activities in the open countryside.
- Development must be of a type that will only have a limited number of visitors a year. Creating leisure uses to cater for a large number of people will create extra road travel, with adverse impacts on the character and amenity of the open countryside.
- will need to be implemented (Policy LC1) to help avoid adverse landscape character impacts.

Tourism

Policy T1 – Touring Caravan and Tented Camping Sites

This policy provides the criteria against which new or extended touring caravan and tented camping sites will be permitted.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	?	•	?	-	-	?	?	-	-	-	?	?	-	?	•	•	-

Sustainability commentary

Tourism is important to the local economy in rural counties, therefore allowing existing accommodation sites to extend or be created is important to the local rural economy. It provides jobs and also improves quality of life for visitors. However, this type of rural development can increase car travel therefore increasing traffic on rural roads and impacting on air pollution and contributing to climate change, as well as having an impact on landscape character and potentially on biodiversity of certain locations.

This policy seeks to protect the landscape character, amenity and reduce the impact on roads.

Main impacts / mitigation / recommendations

- The policy should help make sure that this type of development is compatible with its surroundings. Although the policy does cover some generic issues related to protection of the countryside and access it does help to provide detail on the particular issues that need to be considered for this type of development.

Policy T2 – Visitor Accommodation outside Settlements

This policy provides criteria for new build visitor accommodation outside settlements.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	?	●	-	?	●	●	?	?	-	-	-	-	?	-	●	●	?

Sustainability commentary

Tourism is important to the local economy in rural counties, therefore allowing new visitor accommodation is important to the local rural economy. It provides jobs and also improves quality of life for visitors. However, this type of rural development can increase car travel therefore increasing traffic on rural roads and impacting on air pollution and contributing to climate change, as well as having an impact on landscape character and potentially on biodiversity if certain locations.

The policy does restrict the development of new buildings to existing medium to large hotels in the County. There are exceptions to these permissions and strict criteria is provided to ensure accommodation is restricted to either existing buildings and the accommodation is restricted to short stay. This is helps to encourage tourists to visit the area who are more likely to help the local economy.

Main impacts / mitigation / recommendations

- This policy sets the criteria to help make sure that this type of development does not harm the countryside character. The policy should help support the rural economy.

Policy T3 – Golf Courses

This policy provides criteria relating to permitting golf courses.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
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-	?	•	?	•	-	?	?	-	-	?	?	?	-	?	•	•	-
<p>Sustainability commentary</p> <p>Tourism is important to the local economy in rural counties, therefore golf courses can contribute towards a local rural economy by providing jobs and also contribute to improving the quality of life of visitors. However, this type of rural development can increase car travel therefore increasing traffic on rural roads and impacting on air pollution and contributing to climate change, as well as having an impact on landscape character and potentially on biodiversity if certain locations.</p>																	
<p>Main impacts / mitigation / recommendations</p> <ul style="list-style-type: none"> • he reference to ‘detailed planning considerations’ may not be necessary as this and other policies of the plan are clear on development of leisure activities and protection of the natural and built environment. • It might be more efficient and concise to provide a ‘countryside’ policy which covers all types of developments. • The policy should help make sure that this type of development takes into consideration landscape and biodiversity impacts as part of a planning application. Although golf courses are open spaces their characteristics of a heavily managed landscape do have the potential for detrimental impacts on areas of landscape quality and on biodiversity. 																	

Valuing our environment

Policy SD1 – Renewable energy																	
The policy sets out the criteria on which decisions about renewable energy planning applications will be based.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	?	?	?	?	?	-	?	-	?	?	●	?	?	●
Sustainability commentary																	
<p>The policy is quite supportive of new renewable energy development in suitable locations where they would not cause unacceptable impacts. The policy allows for wind energy development of more than 5MW anywhere within the County, where the distinct identity of the County will not be compromised. The <i>Monmouthshire Renewable Energy and Energy Efficiency Study (2010)</i> does identify several sites where there may be potential for such schemes and they have the potential to provide low carbon, commercial viable energy.</p> <p>The exact impacts of this policy may depend on the type of technology and exact location.</p>																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> The policy has the potential to allow development of renewable energy schemes in suitable parts of the County. The policy sets controls to avoid adverse impacts from this type of development, although these are not overly onerous and suitable development should be able to secure planning permission. 																	

Policy SD2 – Sustainable construction and Energy Efficiency																	
The policy sets out that proposals for low and zero carbon design will be permitted, subject to defined criteria.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	-	-	?	?	?	-	?	-	?	-	?	-	-	?
Sustainability commentary																	
Sustainable construction and energy efficiency in new development are an essential part of delivering development in a way that minimises environmental impacts and addresses the need to make best use of natural resources. This policy supports low and zero carbon design in new buildings and this is positive in helping meet sustainability objectives. However, the policy could go further in setting requirements for new buildings, without necessarily repeating national policy, taking into account the findings of the <i>Monmouthshire Renewable Energy and Energy Efficiency Study (2010)</i> .																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> • Low carbon development is an essential requirement, policy wording should reflect this. • Without repeating national policy the supporting text could refer to the need for development to comply with sustainable construction standards (BREEAM and Code for Sustainable Homes). There are many other aspects of sustainable construction including resource efficiency, biodiversity protection, water efficiency and a quality living environment. • The <i>Monmouthshire Renewable Energy and Energy Efficiency Study (2010)</i> suggests more stringent sustainable construction and renewable energy standards on strategic sites. This has not been included in the policy. PPW also states that local authorities should assess strategic sites for opportunities to require higher sustainable buildings standards (4.11). Strategic site policies of the LDP do require feasibility assessments for low carbon energy on these sites. This requirement should be for all sites over a certain size, irrespective of future use. 																	

Policy SD3 – Flood risk																	
This policy sets out the controls that will be put on development in flood risk areas.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate

-	?	●	-	-	-	-	-	-	-	?	-	●	-	-	-	-	-	●
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Sustainability commentary

This policy should help in protecting the most vulnerable uses from flood risk areas. The policy is in keeping with national policy.

Main impacts / mitigation / recommendations

- Where development is proposed in an area of elevated flood risk the policy should require that the site is resistant to flood, and also that buildings are resilient to flood if it should happen. Flood resilience can include making sure the site is well drained so flood waters can disperse, special waste water drainage, resilient building materials, design features such as higher electrical outlets, avoidance of single storey homes.

Policy SD4 – Sustainable Drainage

The policy sets an expectation for new sustainable drainage systems as part of new development.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	?	?	?	-	-	?	●	●	-	-	-	-	-	●

Sustainability commentary

SUDS can have many sustainability benefits, not only in reducing flood risk but also in providing a wildlife or landscape asset as part of new development. This multi-functional role is noted in the supporting text. This policy supports the use of SUDs and therefore may help in meeting sustainability benefits.

Main impacts / mitigation / recommendations

- SUDs are likely to have a positive impact on meeting some sustainability objectives.

Countryside and Nature Conservation

Policy LC1 – New buildings in the open countryside

This policy sets criteria for new development in the countryside.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	?	-	-	-	-	?	-	?	-	-	-	-	?	-	?	?	?

Sustainability commentary

This is a generally positive policy for seeking environmental protection, and should help ensure that the countryside is not harmed by essential new rural development. This policy provides a useful catch-all for development of new buildings in the open countryside. The policy relates strongly to several policies relating to economic growth in rural areas.

This policy provides the necessary criteria on which new development in the open countryside should be judged. It does provide similar policy coverage to some other policies, such as landscape and the historic environment. However, conserving the high quality countryside is an area of particular concern for the County and therefore reiterating these issues in relation to development in these locations may be suitable.

Main impacts / mitigation / recommendations

- This policy provides the necessary criteria on which new development in the open countryside should be judged.

Policy LC2 – Blaenavon Industrial Landscape World Heritage Site

This policy sets the specific protection measures for the World Heritage Site (WHS), these relate primarily to the landscape qualities of the area.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	-	●	●	●	-	-	-	-	-	-	-	-	?	-

Sustainability commentary

The policy should help protect the landscape qualities of the World Heritage Site. The policy could specify that development in the WHS would only be permitted where it is related to the management of the designation.

Main impacts / mitigation / recommendations

- The policy is likely to have a positive impact on retaining this historic landscape.

Policy LC3 – Brecon Beacons National Park

Policy LC4 – Wye Valley AONB

These two policies relate to the protection of the landscape character of these two areas designated for their landscape quality. The policies propose limiting development that would harm the natural environment quality.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	?	-	●	●	-	?	?	?	-	-	-	●	-	-	●	?

Sustainability commentary

These policies have a positive relationship with sustainability objectives relating to the landscape protection including historic landscapes. They should also have secondary benefits for objectives relating to land use and biodiversity protection, as well as air and water quality. There is some risk that overly restricting development could have adverse impacts on meeting development needs in some locations.

Main impacts / mitigation / recommendations

- The policies are likely to have a positives impact on the protection of the natural environment..

Policy LC5 – Protection and enhancement of landscape character

This policy sets the principles for the protection of the wider landscape in the County, based on LANDMAP character assessment.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	?	?	●	●	-	●	-	-	-	-	-	?	-	-	●	●

Sustainability commentary

The policy relates to the LANDMAP character assessment and this allows the specific features of the landscape in any one location to be taken into account, rather than relying on a blanket local landscape designation. The policy sets out clearly what it is about the landscape that should be protected from harm. There will be many benefits for sustainable development of protecting landscapes, including as a biodiversity and historic heritage asset. The high quality of the Monmouthshire landscape is a major asset for the County, its continued protection and enhancement will have benefits for the local economy.

Main impacts / mitigation / recommendations

- This policy will help meet sustainability objectives relating to landscape protection, with other benefits relating to the multi-functional role of high quality landscapes.

Policy LC6 – Green Wedges																	
The policy identifies five specific areas for protection of open countryside as part of preventing settlement coalescence.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	?	-	?	?	?	?	?	?	-	-	-	-	?	-	-	-	?
Sustainability commentary																	
This policy can help protect the unique identity of different towns, preventing urban sprawl and expansion. This can have positive benefits in protecting built and landscape character as well as allowing people to have better access to the open countryside. However, this is not an environmental quality designation and implementing this policy needs to ensure these landscapes do not displace development onto higher quality areas (for instance biodiversity or landscape importance). In accessibility terms it also may be suitable for some settlements to coalesce where it would allow a settlement with a good range of services to grow.																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> • The policy needs to be implemented in a way that does not harm nearby higher quality areas of open countryside. • Reviewing green wedges in the future may be necessary to ensure they are not stifling the growth of towns or villages that present an opportunity for sustainable growth and improved access to services. 																	

Policy GI1 – Green Infrastructure																	
This policy sets out the need to protect and enhance green infrastructure in the County.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	●	●	●	●	?	-	?	?	-	-	-	?	-	-	?	●
Sustainability commentary																	
This policy is likely to have a positive impact on achieving sustainable development. Green infrastructure networks can have a variety of																	

sustainability benefits, including protection of the built environment, creating an attractive place to live, supporting healthy lifestyles and improving non car access to services.

Main impacts / mitigation / recommendations

- Implementation of the policy will be enhanced through the preparation of the Green Infrastructure SPG for the County, this should include the areas where the infrastructure needs to be maintained and where it need to be enhanced. Without the additional guidance of the SPG it may not be possible to successfully secure all developer contributions towards enhancement of the network
- The policy has the potential to have a range of benefits for sustainable development, including biodiversity, landscape, access and health.

Policy NE1 – Nature conservation and development

The policy sets out the criteria for the protection of wildlife and geology in the County. The policy addresses protection and enhancement throughout the County, not only on designated sites.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	●	●	●	●	●	?	-	?	-	-	-	?	-	-	?	●

Sustainability commentary

This policy should help in the protection of wildlife and geology throughout the County.

Protection of biodiversity wherever it is found is positive in seeking greater environmental sustainability. As well as benefits for biodiversity there can be other positive aspects of biodiversity, including helping wellbeing and people’s understanding of the natural environment. Green spaces in towns can also help improve the quality of the built environment, making areas more attractive for local people and potential investors, and help in mitigating some of the urban heating impacts of climate change.

Use of locally appropriate plants where possible for landscaping is supported in seeking sustainable development (although strictly native may not be necessary). Plant choice should encourage biodiversity through using shrubs and bushes of benefit to local wildlife, such as insects and birds.

Ensuring that the ecological potential of empty buildings is considered prior to redevelopment is essential in avoiding harm to many legally protected species, including bats and owls. Providing alternative roosts will be essential where potential impacts are identified.

The policy is quite restrictive of development that would cause harm to wildlife and this is positive in terms of conserving these assets wherever they are found.

Main impacts / mitigation / recommendations

- The policy is positive in meeting objectives for biodiversity and helping protect nature conservation assets through the County.

Environmental protection

Policy EP1 – Amenity and environmental protection

This policy requires that new development should aim to avoid any additional pollution risks.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	●	?	●	?	●	-	●	●	-	-	-	-	-	-	-	-

Sustainability commentary

The intention of this policy should help in achieving sustainability objectives relating to several themes. Demonstrating that development will do no harm in terms of some pollution impacts may not always be straightforward, for instance impacts on AQMA may be difficult to manage as they will relate to traffic movements.

Main impacts / mitigation / recommendations

- Some impacts may need to be mitigated in combination with other strategies, such as Air Quality Management Plans.

Policy EP2 – Protection of water sources and the water environment

The intention of this policy is to protect water sources for quality and quantity.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	●	-	●	-	-	-	-	●	●	?	-	-	-	-	-	●

Sustainability commentary

This policy should help to protect water resources in the County. Resource use, including water, is one of the main impacts that the quantity of

development promoted through the LDP can have on environmental sustainability. This policy may help to ensure that development is only delivered that does not harm current and future supply. It is not clear in the policy if there are areas that are already under stress for water availability, as the supporting text to the policy suggests development will not be permitted in these locations. In addition, cumulative impacts may need to be taken into account.

Main impacts / mitigation / recommendations

- Policies on sustainable construction should help ensure that development is delivered that makes efficient use of water resources.

Policy EP3 – Lighting

This policy aims to protect residential amenity and the natural environment from the adverse impacts of light pollution.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	●	●	-	?	-	-	-	-	-	-	●	-	-	?

Sustainability commentary

This policy may help to prevent inappropriate lighting on new development. The policy should help ensure the design of lighting in new development, including street lighting, is designed in a way to protect darkness, while still providing safety advantages where required. More careful lighting design and choice of technology may also help reduce energy use. Avoiding overly lit development in the countryside will also help protect the character of these rural areas, protecting truly dark skies that should be a feature of these locations. Lighting can also adversely impact on nocturnal wildlife, such as bats, and this policy should help to avoid these effects.

Main impacts / mitigation / recommendations

- The policy should have a positive impact on several sustainability objectives.

Policy EP4 - Telecommunications

This policy sets out the criteria against which planning applications for new telecommunications masts will be determined.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	-	?	?	?	?	?	?	-	-	-	-	-	?	?	?	-

Sustainability commentary

This policy sets controls for development of telecommunications equipment, it should help avoid the impacts on the natural and built environment from this type of development. The policy should not be applied in an over-restrictive way as good quality telecommunication throughout the rural and urban parts of the County is essential for the economy and can help reduce sustainability impacts relating to travel, as well as helping address rural isolation.

Main impacts / mitigation / recommendations

- As indicated in the supporting text the adverse environmental impacts of this type of scheme must be balanced against the benefits for sustainable development of having a high quality telecommunications system in place throughout the County. These systems are essential as part of reducing people's need to travel, for instance home-working and shopping, and reducing rural isolation.

Policy EP5 – Foul sewage disposal																	
This policy specifies that where there is a mains sewer new development must be connected.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	?	-	-	-	-	-	-	●	-	-	-	-	-	-	-	-
Sustainability commentary																	
This policy should help protect groundwater from the impacts of foul sewage. Ensuring wherever possible that sewage is sent for treatment should help reduce pollution entering the water supply. However, in some rural parts of the County mains sewerage may not be available. The impacts of using alternative forms of waste water disposal against other achieving other sustainability benefits of new development, such as housing, needs to be considered.																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> • None 																	

Waste

Policy W1 – Waste reduction																	
This policy sets a requirement for waste minimisation by requiring a statement on how waste will be managed for development that may give rise to a large amount of waste.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	-	-	-	-	-	-	-	-	●	?	?	-	-	?
Sustainability commentary																	
Reducing waste is an essential part of achieving more sustainable development. The quantity of development promoted through the LDP is very likely to result in a large increase in waste in the County. Therefore, requiring development to show how waste will be minimised will be useful																	

ensuring the better use of resources. However, for waste created during operation some impacts of waste arising can only be mitigated if suitable waste management facilities are in place, and may be beyond the direct control of those proposing the scheme. During construction waste minimisation plan will be essential, especially for large sites.

Main impacts / mitigation / recommendations

- None

Policy W2 – Waste recovery facilities: household

This policy states that household waste recycling facilities will be permitted.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	-	-	-	-	-	-	?	-	-	-	•	?	?	-	-	?

Sustainability commentary

Reducing the amount of waste that is sent to landfill, rather than re-used or recycled, is an essential part of reducing resource use and achieving greater sustainability. This policy is for new sites of the storage of recyclable waste prior to collection for recycling. Having these facilities close to where people live could help encourage household recycling. In addition, these centres can help protect the quality of the built environment by removing the requirement for storage of numerous recycling bins outside people's homes. The policy is compatible with sustainable waste management.

Main impacts / mitigation / recommendations

- The policy or text could clarify the scale of facility this policy refers to, for instance is this for groups of recycling bins or larger sites for a wide-range of recyclable material
- All large developments for residential, economic and commercial use must include a site for the collection of recyclable waste.
- Implementation of the policy will also be reliant on other plans and strategies of the County, such as household waste service plans.

Policy W3 – Waste management facilities																	
This policy sets the principles for allowing waste management facilities in the County, these will be permitted on all B2 sites, subject to constraints.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	-	-	-	-	-	?	?	-	-	?	?	?	?	?	?
Sustainability commentary																	
Reducing the amount of waste that is sent to landfill, rather than re-used or recycled, is an essential part of reducing resource use and achieving greater sustainability. This policy should help make sure this type of facility is appropriately located and helps achieve more sustainable waste management. Criteria such as making sure energy recovery sites have identified an end user or grid connections and making use of non-road waste transfer, are all compatible with securing a good quality site. More detail on the types of suitable waste management facility will be covered in the Regional Waste Plan.																	
Provisions such as preventing the storage of materials in the open air are likely to help protect local amenity, both in terms of quality of the built environment and from litter pollution.																	
Main impacts / mitigation / recommendations																	
This policy may help in sustainable waste management.																	

Policy W4 – Rural composting																	
This policy permits open composting in rural locations.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	?	-	?	?	-	?	?	?	-	-	-	?	-	-	-	?
Sustainability commentary																	

This type of facility can provide waste treatment that makes the best use of organic wastes. Removal of organic wastes from the landfill waste stream can also help reduce the impacts of these sites, for instance reducing leachate, odour and methane emissions.

These sites will need to be carefully managed to avoid adverse impacts, such as odour, windblown litter and the adverse effects of an increase in vermin/pests. The sites will also need to be managed to avoid impacts to water courses from nutrient rich leachate that may run-off from the sites.

Even though these sites need to be in rural locations they will need to have good access from main roads and be as near as possible to where the waste arises from. This will help avoid adverse effects of frequent vehicle movements.

Main impacts / mitigation / recommendations

- Management conditions and controls will be essential to avoid amenity impacts as well as pollution impacts on the natural environment.

Policy W5 – Waste disposal by landfill or landraising

This policy sets the criteria for new landfill or landraising sites in the County. No sites are allocated.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	●	?	?	-	?	?	?	-	-	?	?	-	-	-	?

Sustainability commentary

A study undertaken for Monmouthshire on Waste Management and Disposal identified some locations where landfill or landraising may be suitable in the County. There is an identified need for this type of waste management site in the County. In terms of seeking sustainable development it may have been preferable for the LDP to allocate a site, but the study could not identify a suitable site. The advantage of allocating land for landfill would mean the site could be planned for in a strategic way by identifying the most sustainable site. Letting the location of these sites be determined through planning applications may risk less sustainable sites being chosen. There is also the risk that no sites will come forward, this will mean waste continues to be transported longer distances for final disposal, contrary to the objectives of sustainable waste management.

The landscape impacts of these sites needs to be considered in terms of the wider sustainability benefits of reducing waste transportation. The majority of landscape impacts can be reversed once use of a site ceases, making this type of impact short to medium term only.

Main impacts / mitigation / recommendations

- When implementing the policy the need for sites in close proximity to where waste arises to reduce travel demand and CO2 emissions, should be balanced against other impacts, that may be more short/medium term or local in character.

Policy W6 – Waste deposition on agricultural land for agricultural improvement purposes

This policy is to control the use of waste for agricultural land improvement.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	-	?	-	-	-	-	-	-	●	●	-	-	-	-

Sustainability commentary

This policy should be useful in making sure waste deposition on agricultural land is for the purpose it is intended, and no agricultural sites are used for inappropriate waste disposal. The policy could have benefits for agricultural land quality.

Main impacts / mitigation / recommendations

The policy should help to ensure inappropriate waste disposal is avoided and help enhance agricultural land.

Minerals**Policy M1 – Local Building and Walling Stone**

This policy allows for small scale stone quarrying for local use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	-	-	-	?	●	●	?	-	-	-	●	-	-	-	-	?

Sustainability commentary

This policy should help to preserve the built and historic heritage of parts of the County through allowing use of local materials. The policy will also help reduce transport of bulky stone, with positive benefits relating to reducing the need to travel.

Use of these sites are unlikely to have adverse impacts on local landscape, biodiversity or communities as they will be subject to the controls of local and national policy.

Main impacts / mitigation / recommendations

This policy is likely to be positive in terms of impacts on built and historic heritage.

Policy M2 – Minerals safeguarding areas

The policy sets out the protection measures for minerals safeguarding areas.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	?	-	-	-	?	-	-	-	-	-	-	•	?	-	-	?	?

Sustainability commentary

The policy only allows for permanent new development in safeguarding areas subject to certain conditions. These conditions should help to make sure that the landbank is not lost through sterilisation. Other benefits of a local land-bank are that it can prevent the longer-distance transportation of heavy and bulky minerals, avoiding adverse impacts of HGV use.

The appraisal does not assess the sustainability impacts of actual mineral extraction as the policy does not pre-suppose this will be the case. If extraction is required then it must conform with national and local policy and ensure that there is no unacceptable harm to the natural or built environment or the well-being of local communities.

There is some risk that safeguarding minerals sites may have an impact on delivering other types of development.

Dredged aggregates have the potential to have adverse impacts on the coastal and estuary habitats of south Wales and England. These impacts can occur some distance from the dredge site and relate to disturbance during dredging and disposal of waste, there can also be changes in sediment availability at the coast. The cumulative impacts of dredging should be considered and no new licenses issued if adverse impacts on internationally designated nature conservation sites are identified. However, it is likely the LDP will have little influence over dredging as this policy issue is managed by WAG.

Main impacts / mitigation / recommendations

- The policy may help protect the minerals landbank from sterilisation.
- Any new workings would need to be subject to meeting national and local policies, as well as any necessary licensing and operation restrictions to avoid adverse impacts on the natural environment, built environment, or local communities.

Policy M3 – Mineral site buffer zones

The policy limits development in mineral site buffer zones.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	?	-	?	?	?	?	-	-	-	-	-	•	?	-	-	•	?
<p>Sustainability commentary</p> <p>There are general positive aspects of this policy in helping protect existing minerals workings from unsuitably located new development that may prevent their future use. This will ensure the economic potential of such sites are not harmed. The policy should also help to make sure that the impacts of mineral workings do not have an adverse impact on sensitive land uses.</p>																	
<p>Main impacts / mitigation / recommendations</p> <ul style="list-style-type: none"> • This policy should help protect sensitive development from being inappropriately located near quarries. 																	

Transport

Policy MV1 – Proposed developments and highway considerations.																	
The policy sets out the controls on new development to limit impacts on the highways.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	-	-	-	-	-	?	-	-	-	-	-	-	-	?	?
Sustainability commentary																	
<p>The intention of this policy is to help make sure that new development is suitably well linked to the highway network for safety and ease of movements. The policy also would also require some type of travel planning for large developments where there are likely to be a large amount of trips. However, the policy is not very clear in how this intention will be achieved, this may hinder some users of the plan from a planning application that contains the relevant information.</p> <p>The policy is quite focussed on highways access and does not reflect the strategic policy S18 and the clear intention for more sustainable travel choices. Much of the emphasis is on highway improvements, whereas to achieve sustainable development the policy could focus on car travel reduction.</p> <p>Development should also be expected to always meet car parking standards. There is a need to make sure that these standards fit the characteristics of the Monmouthshire towns and villages. For instance, lower maximum and minimum standards for town centres and locations with good public transport access. The LDP should be encouraging more people to access town centres by public transport, therefore, if a travel plan shows good alternative access then development in central locations should not have to provide any parking.</p>																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> • The Wales-wide parking standards are currently used in Monmouthshire and are SPG. However, during the plan period consideration could be given to reviewing these to ensure they are suitable for the towns of Monmouthshire • As the first policy of the transport section the policy, or text, could emphasise the need to reduce car use, which is a key theme for the LDP and sustainability. • This is very technical policy, some wording changes could make it more succinct and understandable to all users of the plan. 																	

Policy MV2 – Sustainable transport access																	
The policy supports sustainable access to new development.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate

●	-	●	?	-	-	?	-	●	-	-	-	-	-	?	●	?	●
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Sustainability commentary

The policy should help play a role in encouraging non-car travel. The characteristics of the plan area mean much existing and future development is primarily accessible only by car. However, new development in urban extensions and in towns should prioritise sustainable transport access. Setting a pattern of development and network of public transport, walking and cycling links one of the principal ways that the LDP can help deliver sustainable development for the long-term.

There are numerous advantages of setting a pattern of development that does not rely on car use, these including reducing CO₂ and air pollution, promoting healthy lifestyle choices, safety and security through natural surveillance, increased chance of community interactions, and ensuring equity of access (particularly important with rising fuel prices). Therefore, greater support to non-car access is essential.

Securing contributions to access improvements will be essential in helping to deliver more sustainable access at some sites.

Main impacts / mitigation / recommendations

- The policy prioritises non-car access to development. This is supported in meeting sustainable development objectives as good pedestrian access to all sites is essential, making the design and layout of development attractive to those arriving by foot.
- Reducing car travel is one of the main sustainability themes of the LDP. This will be achieved through the layout of development, but also through essential enhancements to non-car travel access.

Policy MV3 – Public rights of way

The policy sets out the criteria for protecting existing rights of way and creating new ones.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	-	●	●	-	-	-											

Sustainability commentary

Rights of Way can have many benefits for sustainable development. Positive impacts can be on access and enjoyment of the countryside, improving accessibility by non-car modes (helping to reduce car use), and encouraging healthy activity.

The policy is very positive in the need to protect existing routes, setting out in a detailed criteria that must be met if their route is disturbed by development.

To secure enhancement the parts of routes that are in need of improvement should be identified as part of a 'green infrastructure network'. Enhancement could

then be achieved through developer contributions from any development along the identified route.

The policy could reflect the importance of these routes for the movement of wildlife in addition to people. Therefore, in any improvement or realignment scheme biodiversity protection could also be a consideration.

Main impacts / mitigation / recommendations

- The plan should help in protecting these important assets for sustainable development.
- Rights of Way in need of extension, enhancement or where new routes are needed should be identified in a ‘Green Infrastructure Plan’, improvements could then be secured through developer contributions.
- To help support growth of the Rights of Way network the policy could be less restrictive on where and how new Rights of Way are delivered.
- The multifunction role of these routes could be a consideration of policy, for example in scheme realignment or extension there should be protection and enhancement of nature conservation.

Policy MV4 - Cycleways

This policy sets the principles for developing new cycleways.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	-	•	?	-	-	?	?	?	-	-	-	-	-	-	?	?	?

Sustainability commentary

Cycling can be a real alternative for many people to car use. They can be particularly useful in urban areas, linking peripheral communities with town centres. As well as helping to reduce car use, congestion and emissions they can help in supporting healthy lifestyles.

The policy could be more positive in encouraging new cycleways. In a similar way to the policy on new Rights of Way the policy is primarily restrictive. It is unlikely many planning applications for cycleways will come forward independently, although they may be part of larger development proposals or developed by the Council. The main criteria that should guide their development is safety for the cyclist and pedestrians.

Main impacts / mitigation / recommendations

- The policy should be more supportive of these types of development. Cyclists and pedestrian safety should be the only real concern, with other policies providing protection to the built and natural environment. Policy criteria that states ‘opportunities for sustainable travel or recreational cycling’ is unnecessary, as all cycle lanes will serve both or either of these.

- New cycle routes should be identified in a 'Green Infrastructure Plan', improvements could then be secured through developer contributions.

Policy MV5 – Improvements to public transport interchanges and facilities

The policy is for interchanges between various forms of public transport.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	-	•	?	-	-	?	?	?	-	-	-	-	-	-	?	?	?

Sustainability commentary

Ensuring that there are good connections between various forms of public transport is an important way of encouraging people to choose more sustainable transport modes. For example, covered connections between trains and bus stops, or provision of cycle parking in bus and train stations. In addition, car parking at rail and bus stations can encourage people to make at least part of their trip by more sustainable modes.

This policy intends to support interchange facilities. However, the policy is lacking any real detail on how the aim of the policy will be achieved. The policy simply refers to 'detailed planning considerations' without saying what these are. Much of the policy is self-evident and it is unlikely applications for this type of scheme would come forward without such considerations.

Main impacts / mitigation / recommendations

- The policy contains little that would actively secure improvements to these interchanges.
-

Policy MV6 – Canals, redundant rail routes.

This policy aims to protect canals and redundant rail routes from development that would prevent a future sustainable transport use.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	-	•	?	?	?	-	•	-	-	-	-	-	-	?	?	•	•

Sustainability commentary

Old rail lines can provide a valuable resource for encouraging sustainable travel and as a leisure/tourism asset. Nationally many such routes have been converted to long-distance cycle paths, their shallow gradients making them perfect for cycling. They can also be used for guided bus paths. Therefore, protecting the entire routes, including structures such as bridges, from harmful development will help secure them for these possible future uses.

Similarly canals could have potential again in future for movement of goods – especially with raising fuel prices. They also provide an important leisure resource and could have tourism potential.

The biodiversity value of these routes is recognised in the supporting text. Verges, embankments and hedges can all provide valuable movement routes for species.

Main impacts / mitigation / recommendations

- Protection of these routes could have positive impacts for sustainable development, including reducing car use and as an economic resource.
- The biodiversity value of these routes should also be recognised and protected.

Policy MV7 – Rear access / service areas

This policy seeks to make sure servicing access is provided in new development in Central Shopping Areas. Existing service yards should be protected if possible.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	●	-

Sustainability commentary

Rear servicing can help make shopping areas more attractive and protect safety. Allowing alternative servicing can also be suitable subject to the time of day servicing occurs and the scale of access needed.

Main impacts / mitigation / recommendations

- None

Policy MV8 – Rail freight

This policy seeks to protect rail freight facilities and supports the development of new ones.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	-	-	-	-	-	-	-	●	-	-	-	-	?	●	?	●	●
<p>Sustainability commentary</p> <p>Moving freight by rail is a lower impact and more efficient way of moving bulky goods. It can significantly reduce carbon emissions from transport as the alternative will normally be HGV. There may also be benefits for local amenity with fewer trips needed to carry the same amount of freight. This can help reduce congestion, maintain air quality, and can have economic sustainability benefits.</p> <p>To make sure these facilities are not lost the policy or supporting text may need to make conditions on business viability more clear. Development on freight locations can effectively 'sterilise' potential for this use and by their nature locations for this use are limited.</p>																	
<p>Main impacts / mitigation / recommendations</p> <ul style="list-style-type: none"> The policy refers to the need for viability for freight use in the long-term to be considered. This is important as even if sites are not viable now rising fuel prices are likely to mean in the longer term these sites will almost always be viable again. 																	

Policy MV9 – The Road Hierarchy																	
This policy sets out the appropriate uses near different sites in the road hierarchy. The emphasis is in on minimising journey time and safety.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
?	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	?	-
<p>Sustainability commentary</p> <p>This policy could help ensure that journey times are maintained, with benefits for the economy. The policy may also help in maintaining road safety. However, it will be important to make sure the policy is applied on a case-by-case basis, so exceptions are made where suitable to make sure the road hierarchy does not dictate the suitability of development on otherwise sustainable sites.</p>																	
<p>Main impacts / mitigation / recommendations</p> <ul style="list-style-type: none"> To ensure the best use of land determining impacts on the road network may be better done on a site by site basis than with a blanket policy. 																	

Policy MV1 already covers these issues to some extent.

Policy MV10 – Transport Routes and Schemes

The policy sets out the transport schemes to be delivered during the plan period, or where this is not possible where land should be safeguarded.

NB: The new M4 is likely to have some significant impact on the environment, however it is not addressed in the symbol summary and comment below as its development is largely controlled by the Welsh Assembly and Monmouthshire County Council can only have a limited impact on its delivery.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
•	-	?	?	?	?	?	?	?	-	-	-	-	?	?	•	•	?

Sustainability commentary

Any improvements that help people choose alternative travel to the car and which promotes equality of access can have significant sustainability benefits. Environmental benefits come from reduced air pollution and carbon emissions, this reduces health impacts of travel. Benefits to communities also come from reducing congestion and the damage this can have on neighbourhoods, for example community severance. Reduced congestion from private car travel can also be of benefit to the economy, by speeding up the time it takes to move goods. Non-car travel can also have health benefits as it is more likely to include walking, everyday exercise is important for health.

Providing attractive, safe and segregated routes can encourage walking and cycling. There are multiple sustainability benefits from reducing the proportion of people who make daily trips by car to easily accessible locations. Benefits include personal health and wellbeing, reducing harmful emissions with benefits for air quality and wider health, it also can help mitigate against climate change.

Improvements that would see new roads built or capacity increased can have some positive sustainability impacts for the economy. In addition, where improvements specifically include measure that will support buses, or segregated walking and cycling routes, these can have benefits for sustainable transport. However, new road development is not very compatible with sustainable development. Increased capacity will almost always lead to increase in cars, with traffic growth eventually increasing to remove and benefits from reduced congestion. There can be adverse impacts on climate change, air quality and health, as well as new large roads causing community severance.

The road improvements can also have sustainability benefits in particularly related to economic benefits from quicker travel times. However, it should be noted that increasing road capacity will not be a long-term solution to reducing congestion and new roads encourage car use, and in the end congestion reaches current levels. Increased car use can also have a range of adverse sustainability impacts, including on air quality, health and climate change.

The development of the new M4 Magor to Castleton is a scheme will be led by the Welsh Assembly, and is therefore beyond the control of the Monmouthshire LDP. However, this scheme does not score well in sustainability terms. There is the potential for the scheme to reduce congestion on this part of the existing M4 but as with any road scheme in the long-term these benefits might be lost if demand for car travel does not decrease. Environmental and social impacts could be significant, including on the internationally designated Severn Estuary and the nationally designated SSSI on the Gwent Levels. New communities that

will be near the route of the new road will also be adversely impacted on, with potential health and noise impacts and some communities becoming increasingly cut-off and inequitably affected roads.

Main impacts / mitigation / recommendations

- A delivery and implementation scheme for these proposals needs to be prepared to give certainty of their development and details of where funding will come from. This would also help secure funding from the developers contributions. The Council intend to prepare an SPG on delivery this should be completed as soon as possible.
- Ensure conditions and contributions are secured in new development to help implement delivery
- To achieve a mode shift from car use to more sustainable modes of transport this policy needs to be implemented in combination with other strategies on encouraging walking, cycling and bus use, this may also require improvement to bus services
- New roads and road improvements should include suitable provision for buses and segregated safe routes for pedestrians and cyclists.

Place Making and Design

Policy DES1 – General design considerations

The policy contains the design principles for new development.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	-	-	●	●	●	●	●	-	-	-	-	-	?	?	-	?	●

Sustainability commentary

The policy should help to ensure development is built to higher design standards. There are many benefits of this, including maintaining the built and heritage character of the County. A high quality built environment can also help support the pride people have in their local neighbourhood and community and can make the towns in Monmouthshire an attractive place for business investment.

The policy sets and indicative minimum density of development in a way that is more supportive of the efficient use of land. Higher density development (30-50dph) can achieve many sustainability benefits. This can include making the most efficient use of land, therefore reducing the

need for greenfield land-take, it can also support a critical population necessary to support local shops and services, and encourage walking. However, minimum densities should take into account context of the site and topography, although the majority of sites can easily accommodate this minimum.

Design that encourages walking and cycling, as is set out in the policy, is an important part of encouraging people out of their cars and to travel by alternative modes. It can also make development more attractive at street level.

Main impacts / mitigation / recommendations

- Duplication of policy wording should be avoided wherever possible.
- Criteria (l) may be difficult to implement as 'privacy' could be argued on many sites, criteria (c) and (d) should be sufficient to prevent overdevelopment as they already cover similar issues.
- Preparation of local design guides can help ensure good quality design in new development. This can be adopted as SPG to give it greater status in making planning decisions.
- Good quality design needs to be matched with sustainable construction.

Policy DES2 – Areas of amenity importance																	
The policy aims to protect areas of open space in the County.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
●	-	-	●	●	●	●	●	-	-	-	-	-	?	-	-	?	?
<p>Sustainability commentary</p> <p>Areas of public open space can make an important contribution to sustainable development in and near main towns. Some benefits for sustainable development from these spaces are:</p> <ul style="list-style-type: none"> • to provide locations for formal and informal recreation and play-space helping support healthy lifestyle choices • contribution to the quality of the built environment, including bringing biodiversity into urban areas • to provide community meeting spaces • help mitigate urban heating effects of climate change • provide flood relief and natural water storage. <p>Therefore protecting these sites from uses that would harm this use should be avoided. The policy supports their protection, and therefore performs well in terms of seeking more sustainable development.</p>																	
<p>Main impacts / mitigation / recommendations</p> <ul style="list-style-type: none"> • These sites need to be identified as part of a green infrastructure study for the County, to indicate where they are and why they should be protected. 																	

Policy DES3 – Advertisements																	
Policy DES4 – Advance tourism signs																	
These policies are to protect the built and natural environment from the harm that can be caused by inappropriately designed and located advertisements.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	-	-	●	●	?	-	-	-	-	-	-	-	-	?	-
Sustainability commentary																	
The policy should help manage this impacts of advertisements on the built and rural environment. The policy is quite specific about some aspects of advertisements (such as limiting hanging signs), but no other type is mentioned. The policy could be more general in the criteria it sets out to protect the environment whatever type of sign or wherever it is located. For example the size and illumination of a sign should be main considerations, with the need to avoid any large advertising hoardings in largely residential or local scale neighbourhoods																	
Main impacts / mitigation / recommendations																	
<ul style="list-style-type: none"> It may not always be possible to control these uses as they will not always need planning permission. 																	

The Historic Environment

Policy HE1 – Development in conservation areas																	
Policy HE2 – Alterations to unlisted buildings in conservation areas																	
Policy HE3 – Design of shop fronts in conservation areas																	
These policies set out the local criteria against which development proposals in conservation areas will be judged, this includes general development and changes to buildings, and new shopfront.																	
Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate

-	-	-	●	●	-	●	●	-	-	-	-	-	-	-	-	-	●	-
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Sustainability commentary

This policy should help protect these areas of historic and built heritage. This will also have a positive impact on the image of the County with benefits for attracting inward investment. There may also be benefits to biodiversity as trees are protected in these areas, these can often be veteran trees that have great importance for biodiversity. Protecting quality areas can also help foster people’s pride in where they live, local identify and therefore community cohesion.

Protecting unlisted buildings will also help protect the character of these areas. The policy sets out detailed criteria on what feature may need to be protected to respect the conservation area designation.

This policy is for the protection of traditional shop-fronts in conservation areas. In these locations part of the built character and links to the past can be in the look of shops, avoiding incongruous design will help protect the character in these areas.

Main impacts / mitigation / recommendations

- Implementation of the Conservation Area plans being prepared for area should help make sure new development contributes to the character of these areas to maintain and enhance their quality.
- The significance of protecting locally important buildings outside conservation areas could be recognised in the LDP. Protection of locally important historic/heritage assets are not covered by national policy and a local policy approach may be needed.
- The policy will need to be implemented alongside national policy to ensure the protection of the historic environment.
-

Policy HE4 – Roman town of Caerwent -

This policy specifically protects the Caerwent Roman town site.

Access	House	Health	Comm	Biod	L'scp	Built	Hist	Air	W qual	W supp	Flood	Mins	Land	Energy	Emp	Wealth	Climate
-	-	-	?	-	?	●	●	-	-	-	-	-	-	-	-	●	-

Sustainability commentary

This policy should help protect this important heritage asset in the County. Protection of the setting is essential to retain the integrity of this site.

Main impacts / mitigation / recommendations

None

Appendix 7

Sustainability appraisal of the monitoring framework for the SA of the LDP

Cross-cutting objective for Climate Change

Ensure development responds to the impacts and causes of climate change by integrating mitigation and adaptation approaches in new development

In the table the * symbol indicates a climate change related objective

Italics: climate change related supporting objective and indicator

Bold: Additional objectives proposed for SA monitoring in addition to those for LDP monitoring (NB: Suggested only – data may not be collected on these issues)

Headline	Objective	Supporting objectives	Possible SA indicators showing the desired direction of change (+) increase or more; (-) decrease, less or none; (nc) no change
Accessibility*	Allow equitable access for all to jobs, services and facilities they need, in a way that reduces reliance on car use	<ul style="list-style-type: none"> • support the growth of mixed use area at transport hubs that have good accessibility by a variety of modes of transport • prioritise walking and cycling, then public transport and finally car users in town centres • <i>reduce reliance on car use to help reduce greenhouse gas emissions</i> • reduce disparities in access to services through a combined approach of suitable facility and service provision and public transport links • support the access of rural communities to jobs and services, ideally within villages but also through good public transport networks 	<ul style="list-style-type: none"> • <i>Percentage of new development within 10 minute walk from a frequent and regular bus service (+)</i> • <i>Average travel to work distance (-)</i> • <i>Proportion of new development where a green travel plan is prepared (+)</i> • <i>Proportion of people travelling to work by public transport, walking or cycling (+)</i> • <i>Proportion of the workforce who remain in their own area for work, according to travel to work statistics' (+)</i> • Proportion of housing development within or adjoining the main towns, Severnside sub-region, primary rural settlements and main villages, as identified in Policy S1.

Housing	Provide a range of types and tenures of housing that allows people to meet their housing needs	<ul style="list-style-type: none"> • provide more affordable housing to meet the needs in rural and urban locations, to enable young people and families to remain in their own communities • provide a range of homes to meet the diverse needs residents, including family homes and smaller flats and retirement units • build good quality housing throughout Monmouthshire 	<ul style="list-style-type: none"> • People in housing need (-) • Affordable home completions (+) • General market home completions • Average density of housing permitted on allocated sites • The number of dwellings permitted and completed on strategic sites as identified in policy S3. • Number of affordable dwellings built through rural exception schemes • Number of dwellings provided in accordance with the settlement hierarchy set out in Policy S2 • Housing land supply
Health, safety and security*	To improve health and wellbeing by encouraging more healthy lifestyles, and protecting people from risk that may impact on their health and/or safety	<ul style="list-style-type: none"> • protect people from the negative health impacts of polluted air and water • ensure equitable access to health services • ensure that new development is designed in such a way as to reduce crime and fear of crime • protect people from the risks of unstable or contaminated land • ensure new development is not in areas at known risk of flood • enhance opportunities for healthy living and help support more healthy lifestyles through access to open space and prioritised cycling and walking routes • <i>protect people for the negative impacts of climate change, such as increased summer temperatures, adverse weather and flooding, through the design and location of new development.</i> • <i>ensure that appropriate flood risk protection measures are in place to protect residents well-being</i> 	<ul style="list-style-type: none"> • <i>Quantity and quality of open spaces and leisure centres (+)</i>

Community	To support and promote the distinctive character of local communities and community cohesion	<ul style="list-style-type: none"> • ensure services and facilities that serve to support local communities are maintained and enhanced as part of new and existing development • allow the communities to be involved in the planning decisions that effect them • help support rural communities, including by helping people remain living in their local area • support a demographic range in all communities, including children, young people, working age and retired people • help in creating development of the type and design that can help avoid adverse impact on the community, such as development that deters anti-social behaviour 	<ul style="list-style-type: none"> • Number of community and recreation facilities granted planning permission (+) • Amount of community and recreation facilities lost to other uses. • Amount of public open space / playing fields lost to development which is not allocated in the development plan
Biodiversity*	Protect, value, manage and enhance healthy functioning ecosystems, habitats and natural species diversity, valuing nature conservation interests wherever they are found.	<ul style="list-style-type: none"> • provide a strong level of protection to sites designated for the national or international importance for nature conservation • allow people to have better access to suitable areas of nature conservation importance to help everyone better understand and value their natural environment • secure opportunities to achieve a net gain in biodiversity through development • development should lead to no net loss in biodiversity • statutory and non-statutory designated nature conservation sites should be afforded a level of protection appropriate to their status • ensure new development does not cause the further fragmentation of habitats and protect and enhance network routes for flora and fauna movement 	<ul style="list-style-type: none"> • <i>Length of hedgerows lost to development (-)</i> • Number and area of developments, not connected with site management for nature conservation, given planning permission in statutory nature conservation sites, SINC's and LNRs. (-) • Area of habitat created, enhanced or restored through planning permissions or obligations for priority BAP habitats and species (+) • Veteran trees or hectares of ancient woodlands lost to development (-)

		<ul style="list-style-type: none"> • support landscaping that makes use of native species • <i>protect habitats that provide migration routes for species in response to a changing climate</i> • designated nature conservation sites should be afforded a level of protection appropriate to their status, from European/intentionally designated sites such as SPA and SAC, to areas of local importance such as LNRs and SINC. 	<ul style="list-style-type: none"> • Change in areas and populations of biodiversity importance – including change in priority habitats and species / change in designated areas. • Development permitted / completed that are within, or likely to adversely effect, internationally / nationally important nature conservation areas. • Developments granted planning permission that cause harm to the overall nature conservation value of locally designated sites
Landscape*	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements	<ul style="list-style-type: none"> • help protect and enhance the rural and coastal landscapes, including the Wye Valley AONB, the Lower Wye and Gwent Levels Historic Landscape, as a living and working asset, for their visual quality, and as a recreation resource • protect the setting of towns and villages in the landscape and enhance the transition of urban to rural • help in the positive management of landscapes to protect and enhance their character • <i>ensure that new landscaping planting can adapt to a changing climate, including increased summer temperatures and storm events and fewer frosts.</i> • Protect landscape features that provide character to streets and public spaces 	<ul style="list-style-type: none"> ▪ <i>Length of linear features (including hedgerows) lost to development (-)</i> • Area of woodland and other land cover lost to development (-) • Area of new development in the AONB not directly related to its management (-) • Number of TPOs lost to development (-)
Built environment*	To maintain and enhance the built environment for both its visual character and distinctiveness and to	<ul style="list-style-type: none"> • ensure new development is designed so as to create places that support people making good quality places for living, working and leisure • <i>develop towns that promote walking and cycling and</i> 	<ul style="list-style-type: none"> • <i>Number of dwellings that comply with the national Code for Sustainable Homes standard (+)</i> • <i>Number of non-residential</i>

create a better living environment	<p><i>are not focused on car use</i></p> <ul style="list-style-type: none"> ensure that the design of new building adds to the character of the area through high quality design and layout promote and protect design led development and buildings of local as well as national architectural importance <i>ensure the layout and design of new development helps reduce energy demand and therefore greenhouse gas emissions</i> <i>ensure new development is designed to be able to adapt to the impacts of climate change, including increased summer heating, storm events and flooding</i> 	<p><i>development (of 1ha or more/1000 sqm or more) built to meet BREEAM national standards (+)</i></p> <ul style="list-style-type: none"> Number of new developments that incorporate on-site renewable energy generation. Sample of planning applications granted for developments with the potential for significant design / environmental implications.
Historic heritage*	<p>Understand, value, protect and restore, where necessary, the historic cultural heritage of the area, including features of the built and semi-natural environment</p> <ul style="list-style-type: none"> ensure new development takes account of and protects and enhances where necessary the cultural and historic heritage where possible identify historic features at risk and help restore these bringing them back into good use ensure buried archaeological assets are protected from harmful impacts of development, or other appropriate management where suitable ensure that the features of historic landscape are respected in new development ensure that locally important heritage is suitably considered in planning for new development <i>where planning permission is required ensure the restoration and repair of historic built heritage is carried out to withstand the impacts of climate change, including adverse weather events</i> 	<ul style="list-style-type: none"> Number of listed building demolished (-) Sample of planning applications granted for developments with the potential for significant impact on buildings of historic / archaeological interest, scheduled ancient monuments and conservation areas adversely affected by development. Number of conservation areas with an up-to-date character appraisal

Air*	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere to protect from climate change	<ul style="list-style-type: none"> • help reduce reliance on car travel by making sure there are real viable alternatives available for all people • ensure new development in town centre locations does not lead to worsening air quality, in particular aiming to improve air quality in Chepstow and Usk town centres • help to reduce energy use and thereby help to reduce emissions from coal, oil and gas power generation • control the locations of polluting development to ensure it is not located near residential areas • help reduce waste to landfill, and set standards for management, to avoid methane emissions • <i>help reduce greenhouse gas emissions through reducing car travel, waste management and reduce energy demand from non-renewable resources</i> 	<ul style="list-style-type: none"> • Number of instances where air quality exceeds objective levels (-) • <i>Percentage of people using their car as their main way of commuting to and from work (-)</i> • <i>Proportion of people travelling to work by public transport, walking or cycling (+)</i>
Water quality	To maintain and improve the quality of ground, surface and coastal waters	<ul style="list-style-type: none"> • ensure new development has sufficient sewerage and waste water treatment to avoid harm to water quality • ensure contaminated land is suitability remediated to avoid water quality impacts • implemented suitable SUDS to avoid run-off of potential polluted water to water courses or aquifers • reduce diffuse pollution • help to meet objectives of achieving good ecological status for surface waters; good status for groundwaters; and no deterioration across all water bodies 	<ul style="list-style-type: none"> • % of rivers reaching ‘good’ biological and chemical water quality (+) • Unsuitable development in groundwater Source Protection Zones (-) • <i>Proportion of development that incorporates SUDS (+)</i>
Water supply*	To maintain the quantity of water available including potable water supplies, and ground	<ul style="list-style-type: none"> • <i>ensure new development makes the best use of potable water, incorporating re-use of grey water in new development</i> • ensure development takes into account the impacts 	<ul style="list-style-type: none"> • Proportion of water resource management units where surface/groundwater levels are on-target for water availability (+)

	water and river levels.	of climate change and reduce summer water availability in planning outdoor spaces	<ul style="list-style-type: none"> • <i>Number of dwellings that comply with the national Code for Sustainable Homes standard (+)</i> • <i>Number of non-residential development (of 1ha or more/1000 sqm or more) built to meet BREEAM national standards (+)</i> •
Flood risk*	Ensure that new development is designed and located to avoid the risk of flooding, and ensure the risk of flooding is not increased elsewhere	<ul style="list-style-type: none"> • <i>ensure that new development is located so as to avoid the risks of fluvial and tidal flooding associated with climate change</i> • <i>aim for greenfield water run-off rates from new development</i> • <i>make use of SUDS to avoid run-off to rivers</i> • <i>ensure that new development does not give rise to increased risk, either on site or through development that exacerbates flooding elsewhere</i> 	<ul style="list-style-type: none"> • <i>Number of permissions for development in Flood Zones C1 and C2 not meeting all TAN 15 tests (-)</i> • <i>Proportion of development that incorporates SUDS (+)</i> • <i>Number of dwellings that comply with the national Code for Sustainable Homes standard (+)</i> • <i>Number of non-residential development (of 1ha or more/1000 sqm or more) built to meet BREEAM national standards (+)</i> • Km of rivers experiencing summer low flow (-)
Minerals and waste*	To ensure that primary materials and minerals are managed in a sustainable way, by safeguarding mineral areas, encouraging re-use and recycling and avoiding final disposal of resources.	<ul style="list-style-type: none"> • <i>reduce waste, particularly to landfill</i> • <i>safeguard mineral resources</i> • <i>encourage better building practices that reduce construction waste and ensure demolition waste is reused in development</i> • <i>help to reduce the use of primary resources by providing appropriate sites for more sustainable waste management, including re-processing, recycling and storage</i> • <i>help reduce greenhouse gas emissions through reducing waste to landfill and suitable management of landfill gases</i> 	<ul style="list-style-type: none"> • <i>Permissions granted contrary to minerals safeguarding advice (-)</i> • Proportion of demolition waste re-used on site (+) • Proportion of Monmouthshire's household waste being recycled and composted (+) • <i>Amount of waste management capacity permitted expressed as a percentage of the total capacity required as identified in the Regional Waste Plan</i> • <i>Extent of primary land-won</i>

			aggregates resources as a percentage of total capacity identified in the Regional Technical Statement.
Land / soil	To use land efficiently by prioritising development on previously developed land where possible, and using existing land efficiently by tackling contamination and protecting higher grade agricultural soil.	<ul style="list-style-type: none"> • protect greenfield land from development where development would be more suitability located on brownfield land • use suitable density standards that ensure the best use of developable land in appropriate locations • avoid building on higher quality agricultural soils, which are scarce in Monmouthshire • ensure contaminated land is subject to appropriate remediation to bring it back into suitable use 	<ul style="list-style-type: none"> • Proportion of development built on greenfield land (nc or -) • Amount of Greenfield land lost to development which is not allocated in the development plan • Annual average densities of new housing development (+) • Hectares of agricultural soil at Grade 3 and better that is lost to development (-)
Energy*	To secure energy efficiency improvements in all new buildings and encourage energy generation from renewable sources.	<ul style="list-style-type: none"> • <i>promote energy generation from renewable resources, including micro-generation as part of the energy requirements of new development</i> • <i>ensure that energy is used more efficiently, including in the design of new development, through promoting local energy generation and reducing car travel</i> • <i>help to implement energy schemes that will help meet Wales targets for renewable energy generation, where suitable</i> • <i>promote community or district heat and power schemes</i> 	<ul style="list-style-type: none"> • Number of developments that contain micro-generation technologies, supplying at least 10% of their energy needs (+) • Percentage of people using their car as their main way of commuting to and from work (-) • <i>Number of dwellings that comply with the national Code for Sustainable Homes standard (+)</i> • <i>Number of non-residential development (of 1ha or more/1000 sqm or more) built to meet BREEAM national standards (+)</i> • Meet targets for renewable energy generation in Wales (+)

Employment	Provide a range of jobs within Monmouthshire that help meet the needs of the resident workforce	<ul style="list-style-type: none"> • maintain a motivated, highly skilled and educated workforce • provide a better match between the skills of the workforce and the type of jobs available • promote local employment to reduce people's need to travel to find work 	<ul style="list-style-type: none"> • Net employment land supply/development and take up of employment land (+) • Amount of employment land lost to non employment uses • Proportion of resident workforce working in Monmouthshire (+) • Average travel to work distance (-) • Proportion of the workforce who remain in their own area for work, according to travel to work statistics' (+) • Percentage of vacant units within CSA of each town and local centre
Wealth creation	Raise prosperity and quality of life by developing a more self-sustaining local economy encouraging indigenous growth	<ul style="list-style-type: none"> • support the diversification of the rural economy and continued support to farming, encouraging food production for the local market • support dispersed employment areas to provide local jobs • provide an infrastructure of transport, communications and land that helps attract new business, including the start-up and growth of indigenous businesses • maintain a coherent and successful range of businesses and build up local supply and distribution chains • help in increasing the income to the area through tourism 	<ul style="list-style-type: none"> • Range of employment space available, distribution and size (+) • Planning permissions granted for employment by settlement • Planning permissions granted for employment use by sector • Proportion of resident workforce working in Monmouthshire (+) • Number of people in-commuting to Monmouthshire • Number of people out-commuting from Monmouthshire • Tourism expenditure (+) • Number of rural diversification schemes approved • Number of tourism schemes approved • Number of tourism facilities lost through development, change of use or demolition

Appendix 8

Comparison of site selection criteria and sustainability objectives

●	There is a positive relationship between the sustainability objective and criteria	-	No identifiable relationship between the objective and the criteria	?	May be a relationship between the sustainability objective and the criteria although this will depend on the characteristics of the site.	X	Conflict between meeting the sustainability objective and the criteria.
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Sustainability objectives

Headline	Objective
Accessibility*	Allow equitable access for all to jobs, services and facilities they need, in a way that reduces reliance on car use
Housing	Provide a range of types and tenures of housing that allows people to meet their housing needs
Health, safety and security*	To improve health and wellbeing by encouraging more healthy lifestyles, and protecting people from risk that may impact on their health and/or safety
Community	To support and promote the distinctive character of local communities and community cohesion
Biodiversity*	Protect, value, manage and enhance healthy functioning ecosystems, habitats and natural species diversity, valuing nature conservation interests wherever they are found.
Landscape*	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements
Built environment*	To maintain and enhance the built environment for both its visual character and distinctiveness and to create a better living environment
Historic heritage*	Understand, value, protect and restore, where necessary, the historic cultural heritage of the area, including features of the built and semi-natural environment
Air*	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere to protect from climate change
Water quality	To maintain and improve the quality of ground, surface and coastal waters
Water supply*	To maintain the quantity of water available including potable water supplies, and ground water and river levels.
Flood risk*	Ensure that new development is designed and located to avoid the risk of flooding, and ensure the risk of flooding is not increased elsewhere

Minerals and waste*	To ensure that primary materials and minerals are managed in a sustainable way, by safeguarding mineral areas, encouraging re-use and recycling and avoiding final disposal of resources
Land / soil	To use land efficiently by prioritising development on previously developed land where possible, and using existing land efficiently by tackling contamination and protecting higher grade agricultural soil.
Energy*	To secure energy efficiency improvements in all new buildings and encourage energy generation from renewable sources.
Employment	Provide a range of jobs within Monmouthshire that help meet the needs of the resident workforce
Wealth creation	Raise prosperity and quality of life by developing a more self-sustaining local economy encouraging indigenous growth

	Accessibility	Housing	Health	Communities	Biodiversity	Landscape environment	Built environment	Historic heritage	Air	Water quality	Water supply	Flooding	Minerals & Waste	Land	Energy	Employment	Wealth	
• Is the site within the main settlement?	●	-	?	?	?	?	-	-	-	-	-	-	-	?	-	-	-	This criteria will help identify if the site will be accessible to services. Sites within settlements are rated higher than those that are not.
• Is the site located on previously developed (brownfield) land?	-	-	-	-	?	?	?	-	-	-	-	-	-	●	-	-	-	This criteria favours sites on previously developed land, helping ensure land is used more efficiently. The criteria can also have benefits for the landscape and biodiversity protection.
• Would the development of the site result in loss of agricultural land?	-	-	?	-	?	?	-	-	-	-	-	-	-	●	-	-	?	The policy favours the protection of higher quality agricultural land. There may be landscape and biodiversity benefits also, as well as the protection of the agricultural economy.
• Is there vehicular access to and from a main public highway?	?	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	?	Suitable vehicular access can help protect safety. Access and highway capacity may also have benefits for wealth creation where the proposed use is employment.

	Accessibility	Housing	Health	Communities	Biodiversity	Landscape environment	Built heritage	Historic heritage	Air	Water quality	Water supply	Flooding	Waste	Minerals & Land	Energy	Employment	Wealth	
<ul style="list-style-type: none"> Is the nearby highway network capable of accommodating the resulting traffic movements? 																		
<ul style="list-style-type: none"> Is the site located within 400m or 800m of an access point to a regular (at least 5 services between 7am and 7pm Monday – Saturday) public transport? Is the site located within 400m or 800m of a shop or selection of shops selling daily living essentials? Is the site located within 1000m or 2000m of a school and other community facilities including recreation open space? 	●	-	●	●	-	-	-	●	-	-	-	-	-	-	?	●	?	<p>The criteria should help choose sites that are in more accessible locations, favouring those sites with good access. This can have many advantages for sustainable development, include supporting communities, healthy lifestyles and reducing car dependence.</p>
<ul style="list-style-type: none"> Would the development of the site result in the loss of publicly accessible open space or have an effect on the public access networks? 	●	-	●	-	-	?	-	-	●	-	-	-	-	-	-	-	-	<p>This criteria can help protect non-car modes of access with benefits for maintaining air quality, accessibility and health lifestyles.</p>
<ul style="list-style-type: none"> Is the site located within 100m of existing water, sewerage, electrical, gas and telecommunications systems? 	●	-	-	-	-	-	-	-	-	●	●	-	-	-	?	●	●	<p>Sites meeting these criteria should be beneficial in providing access to services through telecoms and help protect the water environment through ensuring there is proper waste water disposal.</p>
<ul style="list-style-type: none"> If the site is proposed for residential development, how 	●	?	?	?	-	-	-	-	-	-	-	-	-	-	-	●	-	<p>Where it is a 'good neighbour' use there will be benefits for access to employment. Where a it is a 'bad neighbour' the site</p>

	Wealth	Employment	Energy	Land	Minerals & Waste	Flooding	Water supply	Water quality	Air	Historic heritage	Built environment	Landscape	Biodiversity	Communities	Health	Housing	Accessibility	
does it relate to any industrial/employment uses adjacent to the site?																		does not rate well due to potential noise and other amenity impacts.
<ul style="list-style-type: none"> If the site is proposed for 'bad neighbour' employment/waste/minerals development, are there any residential properties within 400m of the site? 	-	-	-	-	-	-	-	-	-	-	-	-	-	?	●	?	-	The criteria should help avoid development being located where it would adversely impact on residential development.
<ul style="list-style-type: none"> Does the site include or is it close to any areas designated for biodiversity importance at an International level? Does the site include or is it close to any areas designated for biodiversity importance at a national level? Does the site include or is it close to any areas designated for biodiversity importance at a local level? Is the site likely to affect the habitat, breeding site or resting place of a protected species? 													●	-	-	-	-	The criteria favours sites that will not harm biodiversity assets. Stronger precedence will be given for protecting national and international sites, although the criteria makes sure all sites are recognised.
<ul style="list-style-type: none"> Is the site located within or close to an area designated of landscape importance at a national level (Area of Outstanding Natural Beauty or Brecon Beacons National 													●	-	-	-	-	This favours sites that are outside designated areas. Maintaining landscapes can also have biodiversity benefits and protect the character of the County that makes it attractive to inward investment.

	Accessability	Housing	Health	Communities	Biodiversity	Landscape environment	Built heritage	Historic heritage	Air	Water quality	Water supply	Flooding	Waste	Minerals & Land	Energy	Employment	Wealth	
<ul style="list-style-type: none"> Is the site located within or close to an areas designated of landscape importance at local level? 																		
<ul style="list-style-type: none"> What is the landscape sensitivity of the site i.e. how susceptible are the key characteristics of the site to change and what is the value of it as a landscape resource (e.g. field patterns, woodland) What is the landscape capacity of the site ie. What is the limit for acceptable change and the ability of the site to accommodate development? 	-	-	-	-	●	●	-	?	-	-	-	-	-	●	-	-	?	<p>These criteria recognise that in and outside designated areas the sensitivity of landscapes can differ and they may have the capacity to accommodate development. These criteria are useful for this plan area that is characterised by high quality landscapes, and the need to be realistic about accommodating new development around towns and villages.</p>
<ul style="list-style-type: none"> Is the site located within or close to an area designated of cultural heritage importance? e.g. Areas of Special Archaeological Sensitivity, Historic Parks and Gardens, Historic Landscapes and Blaenavon World Heritage Site Is the site within or adjacent to a Conservation Area to the extent that it would affect the setting? Are there any listed buildings within or adjacent to the site 	-	-	-	●	-	●	●	●	-	-	-	-	-	-	-	-	●	<p>These criteria will help make sure the built heritage and historic heritage value of sites are recognised. The criteria are compatible with sustainability objectives related to protection of the built environment and historic heritage. These features may also be important parts of local character that help foster community identity and cohesion. The high quality historic heritage in the County is also likely to be a part of what makes the County attractive to investors.</p>

	Accessability	Housing	Health	Communities	Biodiversity	Landscape environment	Built environment	Historic heritage	Air	Water quality	Water supply	Flooding	Minerals & Waste	Land	Energy	Employment	Wealth	
<p>where development would be to the extent that its setting would be affected?</p> <ul style="list-style-type: none"> Are there any Scheduled Ancient Monuments within or adjacent the site to the extent that its setting would be affected? 																		
<ul style="list-style-type: none"> Is the site located in an area prone to flood risk? 	-	●	●	-	-	-	-	-	-	-	-	●	-	-	-	-	-	<p>This criteria will show if a site is in an identified flood zone. Avoiding development in these areas is essential for protecting health.</p>
<ul style="list-style-type: none"> Does the site's stability or topography present an obstacle to its development for the proposed purpose? 	-	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<p>The criteria is compatible with protecting people from the risk of unstable land.</p>
<ul style="list-style-type: none"> Is there evidence that the site could consist of potentially contaminated land? 	-	-	●	-	-	-	-	-	-	●	-	-	-	?	-	-	-	<p>The criteria will help highlight potential contamination issues. This will not necessarily prevent a site being suitable, but will ensure that remediation of contamination is taken into account in plans for the site.</p>