



# Monmouthshire County Council

## Replacement Local Development Plan (2018-2033)

### Preferred Strategy Representation Form

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

### PART 1: Contact details

Your/ your Client's details		Agent's details* (if relevant)
Title:	Mr	
Name:	David Harris	
Job title: <i>(where relevant)</i>	Chairman	
Organisation: <i>(where relevant)</i>	Mathern Community Council	
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\*Note if agent's details are included, all correspondence will be sent to the agent and not to the persons/organisations given in Part 1.

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

#### Office Use Only

Representor Number .....

Submission Type (email/web/letter etc) .....

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

## PART 2: Your Comments

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

### **Key Issues, Vision and Objectives:**

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

The vision is laudable and not unreasonable, but it has to be deliverable and achievable.

The current proposed strategy does not respect the global location of the County in relation to its neighbours and does not respect what they offer and what Monmouthshire possesses that makes it distinctive and desirable as a place to work or live.

The proposed strategy is generated from unproven or tested employment growth models to deliver residential demand.

We are a rural County with a substantial amount of beautiful countryside and landscapes. Farming, retail and leisure are our key industries with other employers in our principle towns of Monmouth, Abergavenny and Chepstow.

Residentially we are a commuter County.

Neighbouring Counties have larger urban areas and employment hubs. We do not need to compete with them regarding urban growth and facilities and neither do they with us.

Home working and quality of environment are becoming ever more important, particularly since the Covid 19 pandemic.

The residential growth proposed in the proposed plan is unnecessary and its proposed distribution goes completely against the principles of sustainability.

By way of example, the number of additional houses proposed in the Chepstow area needs to be viewed in the context of other proposed developments proposed in neighbouring Counties that may make the Monmouthshire Plan unsustainable in terms of infrastructure and community facilities.

The redevelopments of the Beachley Army site for residential (800 units proposed after the Barracks close in 2027) plus large residential developments in Lydney (current proposal for a further 149 units) and further developments in Tutshill (185 units proposed in the latest application) will have a huge impact on Chepstow. The road infrastructure cannot accommodate current traffic numbers let alone more. Environmental pollution levels will increase and key green field sites at the entrance to our County will be lost.

The Station Road site in Chepstow of 230 houses and new developments in Sedbury and Tutshill are yet to be completed but this will contribute further to local congestion.

A similar argument can be made for the redevelopment of the Llanwern site and development of Severnside to the west of Chepstow.

The vision and objectives need to be achievable but those set are not when put in the context of the scale of proposed development within Monmouthshire, compounded by developments in neighbouring Counties.

If the developments proposed within the replacement plan and those of surrounding counties were delivered the natural environment within the south of the County of Monmouthshire, and Chepstow in particular, will be destroyed and become a single mass of development.

This cannot be allowed to happen.

## **Preferred Strategy – Sustainable and Resilient Communities Strategy**

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

As noted above, the scale of development proposed in the plan for the County is unnecessary, unjustified and will have an adverse impact on the County and Chepstow in particular.

This Council previously commented on the lack of evidence to support this growth strategy particularly when linked to potential employment growth and residential provision. The infrastructure in the Chepstow area in particular is not capable of accepting further large scale growth. The proposals within the plan refer to development of residential spaces and does not identify the implications of this in terms of infrastructure.

### **What are the infrastructure solutions?**

- A Chepstow by-pass
- Rearrangement of High Beech Roundabout
- Road widening

### **New sewage mains?**

- These will require planning, land, money, community consultation and engagement none of which is deliverable within the time span of the RLDP.

### **How will the environmental impact of such schemes be assessed?**

- As an example of the strain on the current infrastructure is under, the recent planning consent for a Greggs and Subway just off High Beech Roundabout in Chepstow has led to substantial additional congestion to the roundabout, down Pwllmeyric Hill and up the Wye Valley link road as a result of traffic trying to turn right into the site off the A48.

Chepstow is the entrance to Wales and Monmouthshire, a picturesque rural county.

The developments proposed do not contribute in any way to enhance these assets and will only sustain Chepstow and its surrounding villages as inert commuter centres and not vibrant communities due to the scale of the over development in lieu of organic growth.

The proposed development of long-established parkland protecting the identity and separating stand alone villages such as Mathern and Pwllmeyric, surrounding Chepstow is not sustainable.

Once this environment is destroyed and green belt/wedge land is eroded it has gone, destroying our most valuable asset and our environment.

The land separating Chepstow and its surrounding villages should be protected from development and any development centred on infill or brown field sites in outlying villages and towns.

This is sustainable and will ensure that any developments taking place in any areas do not detract from the existing environments and continue the organic growth that has existed throughout history.

## Strategic Policies S1 – Strategic Sustainable and Resilient Growth

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

**Please note comments above.**

*The scale of proposed development for the County is far too great and unnecessary and unsustainable.*

*The infrastructure to support such growth is not in place now and cannot be delivered within the life of the plan.*

*Throughout history strategic plans are successfully delivered by identifying infrastructure requirements, putting the infrastructure in place then allowing development to follow within the framework established.*

*This plan identifies developments on green field sites in areas with exhausted infrastructure. Infrastructure enhancement solutions have been debated in these areas for many years but have not moved forward in any way. Resources to develop infrastructure are not in place and Monmouthshire is not heavily supported by Welsh Assembly funds as it is a rural County.*

*The proposals are therefore undeliverable and thus unsustainable as they will significantly adversely impact the residential amenity, environmental quality and biodiversity of the County and Chepstow area in particular.*

## **Strategic Policy S2 – Spatial Distribution of Development - Settlement Hierarchy**

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

*As noted above the proposal to allow development on established parkland at the entrance to the County and dividing the key historic town of Chepstow and its surrounding villages of Mathern, Pwllmeyric and Mounton is unnecessary and goes completely against the principles of protecting our natural environment, heritage and identity of the County.*

*When looked at globally current developments underway and development proposals round Chepstow more than provide for any demand that Chepstow may have.*

*Chepstow's main issue is sustaining its current infrastructure and regenerating its town environment.*

### **Current development sites.**

*Station Road Site, Chepstow, 230 units currently under construction.*

*Tutshill 149 units Currently under construction.*

*Old Dendix site, Chepstow, 169 units currently under construction.*

*Lydney currently 148 units proposed.*

*Beechley Army Camp 800 units proposed after the closing of the camp in 2027.*

*Llanwern site.*

*Severnside Developments.*

## **Strategic Growth Areas (Please State which Strategic Growth Area you are commenting on)**

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

### **Chepstow Development Area**

*The current Local Development Plan protects rural areas on the perimeter of our towns and villages particularly those of Chepstow, Mathern, Pwllmeyric and Mounton. There is no rationale to vary this policy and destroy the unique identity of the villages, absorbing them into a development mass with Chepstow. Such growth is not needed to sustain employment within the locality of the greater County.*

*The development land in question is established ancient parkland which supports a unique biodiversity and environment at the entrance to the County.*

*This Council completely opposes any developments proposed on the current land protected under the current Plan and would seek specific sustainable justification for considering any such site when set against the context of our responses to the other questions in this consultation.*

**Strategic Policies S3 – S18 (Please State which Strategic Policy you are commenting on)**

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

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

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

**Any other Comments**

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

The Plan should provide a focus on how it can enhance the attraction and viability of our towns and villages through policies to promote sustainable environments.

By example, removing parking charges in our towns that just encourage shoppers to use edge of or out of town shops with large car parks. If parking charges were removed it would promote the sustainability of niche specialist shops, stores and cafes.

**Welsh Language**

*We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.*

*What effects do you think there would be?*

*How can positive effects be increased, or negative effects be mitigated?*

*I can see a potential detrimental impact on the Welsh language in respect of these proposals if the scale of development is achieved and the inevitable inward migration is attracted from adjoining English Counties.*

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

*Reduce the scale of development in the Chepstow and Severnside area within Monmouthshire.*

### Initial Integrated Sustainability Appraisal

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

### Habitat Regulations Assessment

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

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

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

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

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

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

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