

From: [Brown, Louise](#)
To: [NDE](#)
Subject: Draft National Development Framework
Date: 14 November 2019 13:47:23
Attachments: [draft-national-development-framework-response-form_Cllr Dr Louise Brown- November 2019.doc](#)

Email : ndf@gov.wales

NDF Team

Planning Policy Branch

Welsh Government

Dear Sir/Madam,

Please find attached my personal as opposed to organisation response to the above consultation.

I would be grateful if you could confirm receipt.

Many thanks

Cllr Dr Louise Brown

Mae'r neges e-bost yma a'r ffeiliau a anfonir gyda hi yn gyfrinachol ac fe'i bwriedir ar gyfer yr unigolyn neu gorff y'u cyfeiriwyd atynt yn unig. Gall gynnwys gwybodaeth freintiedig a chyfrinachol ac os nad chi yw'r derbynnydd bwriadedig, rhaid i chi beidio copïo, dosbarthu neu gymryd unrhyw gamau yn seiliedig arni. Os cawsoch y neges e-bost yma drwy gamgymeriad hysbyswch ni cyn gynted ag sydd modd os gwelwch yn dda drwy ffonio 01633 644644. Cafodd y neges e-bost yma sgan firws Microsoft Exchange Online Protection.

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The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

Consultation Response Form

Your name	Cllr Dr Louise Brown
Your address	Shirenewton
Preferred contact details (email/phone/post)	louisebrown@monmouthshire.gov.uk
<u>Organisation (if applicable)</u>	<u>Monmouthshire County Councillor- Shirenewton Ward</u> <u>Personal response only on ward area concerns</u> <u>and not organisation response</u>

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

In my opinion, Outcome 11 should be given more importance and improved wording in outcome itself.

I would suggest that as outcome 11 on the challenges of climate change is seen as demanding urgent action but it should not be listed as the last outcome. In my opinion it should be listed as a top outcome. It should also mention the need to provide greenbelts and plant trees within the wording of the outcome itself. It is not clear from the document if all outcomes are equally important or if there is any ranking in terms of their order?

In Chepstow, we have unacceptable air quality measures above acceptable European levels on Hardwick Hill on the A48. I would like to see the framework in outcome 11, more strongly worded on the entitlement of Welsh citizens being able to breathe clean air at the roadside in view of the greater encouragement for walking and cycling in PPW Edition 10.

It should then make it clear that any development should be refused which would increase car use in areas which already have road side levels of air pollution above EU levels. It should be made clear that such considerations can be grounds for refusal of planning permission and that any detriment to the air quality at the roadside itself is a considerable material consideration allowing for refusal in planning applications, including the choice of development site locations in an LDP or Spatial Regional development plans and any other general planning development as well including individual developments and those of a higher number.

For the climate change outcome wording, a higher standard of using Air Quality measured at the roadside at unacceptable EU levels (as opposed to currently where houses are located). It should be a material consideration given considerable weight, which should lead to refusal of planning permission, in the same way that a lack of a 5 year land supply of housing has been used to allow development.

I am in the process of obtaining air quality measures for a year on the A48 Pwllmeyric which should be finalised by April 2020. However, I have already got a couple of readings in 2 locations at the roadside above EU levels but any set back of houses (despite having soot on one house in the area) lowers readings and takes it out of an air quality zone.

My concern is that school children are waiting at bus stops by the roadside in areas which may have polluted air. Alternatively, if they walk to school they do so in polluted air. In view of the importance of responding to climate change emergency; I would like the Welsh Government to set higher standards in the NDF so that it is the roadside readings which count as this is the air we breathe if we walk or cycle. The PPW edition 10 makes it clear that there are no safe levels.

I am also concerned that the Council wish to develop on council owned farms many of which are located in the Shirenewton/ Portkeswett area which will only add to the air pollution on the A48, as traffic from this area will head for the motorway junction via the A48 Pwllmeyric to commute by car to Bristol.

The A48 Pwllmeyric is already a very busy road as it has on average 100,000 vehicles a week and has recorded up to 165,000 vehicles (traffic increased by events such as Chepstow race course days). The reason for wanting to develop on this council owned land is to get capital receipts to assist in the 21st century school building programme in other Monmouthshire areas due to MCC being one of the lowest funded Welsh local authorities from Welsh government per head of population which urgently needs to be more fairly addressed.

However, our local Chepstow and surrounding area cannot take this extra traffic congestion, there is enough extra housing from the Gloucestershire side. Unlike MCC I fully support the NDF on the need for green belts as outlined in this draft NDF to avoid South Monmouthshire being overdeveloped. Whilst it is argued that only 3% of land is developed in Monmouthshire, 80% of that is in South Monmouthshire and so North Monmouthshire in the Heads of the Valleys area would be better to develop in view of the improved road infrastructure already there.

The original MCC aim was to have a settlement on the council owned farm areas of between 6 to 8 thousand houses which would simply bring Chepstow to a standstill and literally drown it, particularly as the population of Chepstow is about 12.5 thousand. Settlements have been ruled out of the LDP but the MCC is still trying to argue in favour of such development in the proposed greenbelt area in relation to affordable housing. There is absolutely no guarantee that the 50% affordable housing could be provided or it would be any better than the normal 35% affordable housing on other private developments, particularly as a site on the Crick Road for 291 houses in the current LDP is already having problems and delays with the cost of sewerage infrastructure connections.

I am concerned that without a strong green belt policy the health and wellbeing of residents in this area will be detrimentally impacted. It is important to ensure that the area is protected from overdevelopment. There is already a well expressed view that Chepstow and surrounding areas are already too full. The infrastructure in terms of roads, traffic congestion, air pollution and GP surgeries cannot cope. It takes up to 6 weeks to get a standard non urgent GP appointment compared to 2 weeks across the bridge.

The traffic congestion has become significantly worse since the Severn Bridge tolls have been removed and a substantial increase in housing by Gloucestershire between Lydney and Chepstow with only one road through Chepstow. It needs a by-pass now for existing traffic and definitely not to add to any further pressure on our roads by any extra development.

Also an M48 link is needed at the Haysgate/ St Pierre area of the A48 Pwllmeyric to take traffic for Bristol from the Caldicot direction and reduce the pressure of traffic coming to the High Beech roundabout Chepstow which is a pinch point. The A48 Pwllmeyric may well be busier than the M48 itself between Chepstow and the link for the M4 towards Newport. The queues of traffic joining the motorway junction at Chepstow in the morning are from 7am to 9am in the morning on weekdays. I have seen traffic queues to join High Beech roundabout along the whole long length of St Lawrence road Chepstow even as far as the race course roundabout as late as 850am.

The by-pass at Chepstow and the M48 link at Haysgate/St Pierre area of the A48 Pwllmeyric are needed to deal with the existing traffic congestion and not as an excuse to add to further traffic congestion by any further development which would only exacerbate and make much worse existing unacceptable air quality and traffic congestion concerns.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Policy 1

In relation to policy one it would be helpful if the wording of the policy was changed to include the need to reduce travel by car and ensure the air is clean. It would also be helpful to include about the need to avoid urban sprawl to protect the greenbelts between towns and villages and between villages themselves in order to preserve their character and identity.

There is a real danger that without good policies the area between Chepstow and Newport will become an area of continuous soulless housing destroying the rural nature and the main tourist attraction of the rural character of Monmouthshire with its market towns and its ANOB.

Policy 3

In policy 3 it is important that there is an investment in town centres particularly for developing affordable housing in flats above shops in the town centres. However, it is a concern that active travel for improving walking and cycling applies only to town centre areas. It should also cover villages so that local people can cycle or walk to urban areas for employment, shopping, leisure and health activities to reduce car

pollution. However, cycle lanes need to be considered by the side of the road where the road is wide enough to accommodate it without danger to cyclists from passing lorries.

Whilst policy 3 says at the end of the preamble about allowing agricultural diversity, but it is important that prime agricultural land is protected.

Publicly owned land which are brownfield sites should be encouraged to be reused for affordable housing, particularly those located in town and city centres but only for publicly owned land in town or city centres not in the proposed green belt.

Policy 4

I strongly agree that in policy 4 growth in rural towns and villages should be proportionate, evidence based and consultative. The recent decision on the 111 houses in Raglan which was refused by the planning inspector and Minister supports that principle, as well as reducing car based travel and not using prime agricultural land. However, planning policies need to allow for sufficient onsite parking places to avoid cars parking on pavements and also villages have a greater need for onsite parking due to the lack and low frequency of public transport in rural areas.

Policies on food and drink, tourism and leisure are mentioned as important in rural areas. It is important in terms of our farms that prime agricultural land is protected from development. In order to enhance Wales own food production for climate change reasons, it would be helpful if farms could be sustained by grants for food production from Welsh government in order to do so.

It is of concern that farms in the local Shirenewton ward area have been changed into equestrian establishments or even applications for agriculture buildings to be converted to offices and barns converted and sold off.

There are few policies to protect farms being dismantled piece by piece by barns being converted and then making it difficult to sell or rent a farm itself as a fully integrated unit and a going farm concern without the available barns to do so.

In addition TAN 6 needs to be amended to prevent new buildings in the open countryside on farms which do not have agricultural ties and then can be sold as private dwellings. This is achieved by caravans/ mobile homes being set up on farm land and having been there for 10 years without enforcement, they then have an entitlement for new residences on the same footprint without any agricultural tie as they have established a residential use on the land by ignoring normal planning rules and if located out of site may be easier to do. All of these replacement residential buildings need to have agricultural ties on them to prevent this practice.

It is very important for rural small businesses to have adequate broadband infrastructure and unfortunately open reach will favour the more profitable urban areas. It is vital for rural businesses to have a good mobile signal and broadband speed. Unfortunately, my ward of Shirenewton suffers from poor connections and no

mobile signal in areas like Earlswood and even a poor signal on the Usk Road Shirenewton and it would be helpful if Welsh Government could have a specific enhanced grant scheme to assist with connections for rural areas and villages.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

Policy 5

It is agreed but much more could be done by reusing existing brownfield sites for affordable housing. For example funding the development of flats above shops, funding the purchase of ex-council properties by housing associations, updating run down terraced housing. It is important not to create ghettos of affordable housing sites. Privately owned town sites can manage at best 35% affordable housing but at least if pepper-potted throughout the site then they are not in areas of poor or better housing.

At MCC the planning committee also tries to ensure that the external quality of affordable housing is of a good standard in relation to its external design features as well as internal size. The external design features of affordable housing need to be of a comparable standard to market housing, so it does not stand out in any way and be easily identified as a poorer area and in that sense a ghetto. Builders may well try to cut costs by providing affordable housing with buildings with no external design features/ lintels etc. and very plain bog standard "no frills" dwellings which compare badly to private market housing even on the same site. Even if affordable houses are smaller they should still look as good as any larger private housing on the same site.

Affordable housing whilst important should not use the proposed green belt areas because that impacts on other important policies such as climate change, preserving good agricultural land, preventing traffic congestion and preserving air quality for the health and well-being of local residents.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

Policy 6

It is agreed but it is important that they are located in rural areas and sited where they do not cause adverse landscape issues. The standard of "significant" adverse landscape issues in the wording of the policy is too high and the word "significant" should be removed as the policy already gives it considerable weight. It is important that the wording of the policy also says in consultation with local communities as to where the best locations are in the local area.

The policy should also mention rural authority areas and villages in particular will be supported by the Welsh Government, as rural areas tend to have poorer mobile signals.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Policy 7

I agree but the problem at the moment is the high cost of electric vehicles and the range of miles they can do, which presumably in time will improve.

The policy should also have some wording on new developments so that each dwelling provides electric car individual household charging points. This should include not just the infrastructure of charging points but the whole item so that it is ready to plug in, model planning conditions on doing so could be drafted. However, the question is, is the electrical infrastructure in place yet in Wales to ensure that the grid has the extra capacity for use by cars and doesn't end up turning out the lights by being over-loaded?

Put simply, what is the electrical infrastructure of Wales like to cope with extra demand from electric cars?

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

However it would be helpful if the policy wording also added about climate change and reducing air pollution.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

I neither agree nor disagree as not sure that the idea of just large scale ones and district heat networks in just priority areas is helpful. If they fit well they should be considered where they are most suitable. For example by the edge of a motorway in a field for wind turbines away from residential property should not cause an issue for landscape or noise.

There could be wind and solar developments but they don't have to be large scale ones as every little helps. However, the policy needs to ensure that both solar farms and wind developments are well away from residential areas due to the noise impact (wind developments in particular) and any adverse landscape impacts for both wind and solar developments. Any developments onshore need to be hidden as solar can cause light reflection issues and they need to be in isolated areas well landscaped away from residential property which do not spoil landscapes, conservation areas or ANOB as well. Also there needs to be the opportunity for local people to benefit from such developments so that they can obtain low cost renewable energy direct at cheaper costs.

District heat networks again could be considered in all areas although not sure if they do not impact on any further development being added to the system? They need capital investment which presumably the Welsh Government can assist with but they should be available for help everywhere in Wales if suitable and not just priority areas.

It is also important to bear in mind that the SF6 gas used to stop electrical problems

with wind turbines has been found itself to cause significant greenhouse gas pollution problems if it leaks. (See article on BBC news 13 September 2019 entitled “Climate change: Electrical industry “dirty secret” boosts warming.”). There are companies which manufacture switchgear without SF6 and this needs to be investigated to ensure that wind turbines are really a green alternative.

<https://www.bbc.co.uk/news/science-environment-49567197>

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

However, the LDP should be in line with the NDF and it is important that the SDP does not override the considerations on regional housing growth in the NDF. It would be unfair to consult widely with the local communities about the LDP and then go on to ignore it for the later SDP, as the LDP would then only have a light touch, whereas the LDP should take priority because of its local consultation.

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

I strongly agree with the green belt in our area as outlined in previous answers to questions in this consultation. Chepstow and the surrounding area(within a 15 mile radius of it) is suffering from traffic congestion and in Chepstow air pollution issues may well have potentially increased by the removal of the Severn Bridge tolls. It has been shown in English and Welsh Government highway studies that traffic was expected to increase by 23% initially and up to 35% at a later stage with the removal of the tolls. There is an increase now and in the future for householders between Lydney and Chepstow, Gloucestershire commuting to Bristol by car via Chepstow. Gloucestershire council is adding significantly to its housing building in the areas surrounding Chepstow and around Lydney, which is adding to this traffic congestion for Chepstow. There is enough house building in the area due to housing on the Gloucestershire side and the housing from the previous LDP for Monmouthshire for the Fairey Mabey site near Tesco's and the Crick Road site of hundreds of houses. Local people are concerned that the Mabey site future house owners will have difficulty in even getting out by car onto the main road due to the current congestion.

It is very important that the NDF protects the areas between towns and villages and between villages themselves in order to protect the character and distinctive nature of villages. In the last plan there were only green wedges in my Shirenewton ward area and these need to be green belts. The removal of the tolls means that significant traffic in a 15 mile radius are heading to the motorway junction at Chepstow to head for Bristol. The 111 houses at Raglan refused by the planning inspectorate and Minister were being advertised as suitable to commute to Bristol which would add to the Chepstow traffic as they would come from the Usk Road to join the massive queues on St Lawrence road for the High Beech roundabout

Chepstow. The distance between Raglan to Chepstow shows that a 15 mile radius is the correct one for the impact on the removal of the tolls and traffic heading for Bristol via Chepstow.

I am also concerned that the NDF needs to develop and stress a wider transport highways assessment when development sites are considered. There is a tendency for the assessment to only include the area surrounding the development not the likely impact on traffic congestion for traffic heading to the Chepstow motorway junction for Bristol via other roads such as the A48 Pwllmeyric from the Caldicot/ Portskewett /Crick/Caerwent area.

I recently responded to the Monmouthshire County Council's consultation on growth and spatial strategy. Please see that full response copied in to the further comments section.

Greenbelts are important within the NDF because there is likely to be the challenge to these green belts and the MCC desire for unnecessary ambitious growth in any subsequent spatial regional strategy and the overdevelopment of the South of Monmouthshire needs to be prevented.

Monmouthshire has little infrastructure capacity anywhere, but the best location for any development in Monmouthshire would be in the Magor/ Undy area with links to the motorway and in the heads of valleys area where the road infrastructure has already been improved by Welsh Government investment. These areas are not suffering in the same way that the Chepstow and surrounding area is from traffic congestion due to the Severn Bridge tolls going. Even without any further house building, existing houses in Chepstow and surrounding area are being sold to people from Bristol which will add to traffic congestion even without any further housing development.

Traffic is also increasing because the tolls have been removed means that less people are car sharing to save on the toll which is also increasing the traffic levels.

I agree that development should be centred on Newport and Cardiff and Heads of Valleys area in the South East Wales region to co-locate jobs and homes. However, it would be helpful if the Welsh Government in its policies and grants could support the type of endeavours most suitable to rural economies such as the growth of the tourism industry and better broadband connections in Monmouthshire, so that more people can work at home instead of commuting long distances to work.

A significant number of people commute out of Monmouthshire to the major employment areas of Newport/ Cardiff and Bristol. Increasing housing in the Chepstow and surrounding area is most likely to result in the increase of this commuting to Bristol and add to the traffic congestion, as people from Bristol are already buying local existing houses in my ward area.

I agree that it is far better to co-locate houses with jobs to cut down on car commuting. Employment and housing needs to go hand in hand and improvement in infrastructure as a result. Providing a significant amount of housing without any extra internal jobs will just result in further commuting. I would not like to see this area

become a suburb of Bristol as it would bring Chepstow to a standstill.

The council continues to wish to support ambitious growth which in my opinion will just increase traffic congestion. This approach is explained below in italics:

Planning –Monmouthshire County Council’s approach in relation to future development

Monmouthshire county council in various documents continues to put forward the desire and vision for ambitious growth both in relation to population, housing and employment sites. Whilst, the Welsh Government will currently not allow new settlements in any area except if joint settlements across local authorities. The Welsh Government’s draft national development framework consultation document did not see Monmouthshire as a high growth area and argued for growth being centred on Newport and Cardiff in the South East region of Wales, to make transport and jobs co-terminus, it had a green belt north of the M4.

<https://gov.wales/draft-national-development-framework> (Draft National Framework consultation-consultation extended to the 15th of November 2019).

However, the Welsh Government Minister would like to see 50% affordable housing on publicly owned land. The response from the council is that most of its publicly owned land is located within the proposed greenbelt and argues strongly against the green belt in our area. Most of the council owned farms are in the Shirenewton/Portkeswett area and it says how these are used to assist the council with its capital receipts for the 21st century school programme (which to date have not assisted Chepstow schools).

Individual Cabinet Member Decision 23rd of October 2019

- ***MCC Consultation response to the Draft National Planning Policy Framework***

It can be found at item 2 including the map:

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=147&MId=3909>

Appendix 1 gives the Council response which ends by saying that as currently drafted Monmouthshire county council cannot support the draft National Development Framework.

The theme of ambitious growth in our area is reiterated in the following Cabinet report on the 6th of November at item 3e:

Cabinet 6th of November 2019

- ***Vision 2040: Economic Growth and Ambition Statement (item 3e)***

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=144&MId=3857>

I personally do not agree with the response from MCC to the draft National Development Framework consultation due to my infrastructure concerns for Chepstow and the surrounding area and the ward I represent. I believe that development should be located in the North Monmouthshire Head of Valleys area where road infrastructure has improved and in Magor/Undy which has motorway links. It is understandable that MCC want to get capital receipts for farm land for development but they have an important agricultural value.

The issue of the need for capital receipts and revenue should be resolved by much fairer funding by the Welsh Government as MCC unfairly continues to be one of the lowest funded local authorities in Wales. MCC receives only about £1000 per head of population with the average about £1300 and with the highest nearly £1600 per head of population.

There is a real need for the Welsh Government to both invest and improve the traffic, road, rail and public transport infrastructure in the Chepstow and surrounding area because of the existing demands on the area. It is again of concern that the transport investment is not being fairly distributed across Wales.

General Comments

Types of Housing

The NDF could consider a policy to improve the building of housing for a lifetime for the elderly such as more bungalows and warden assisted flats or villages for the elderly as in the Crick development. It would then help the elderly to move out of larger houses to free up the larger houses for the younger families. The NDF should also consider how to best to help accommodation for key workers such as carers, social workers, teachers, nurses, medical staff etc.

Garden Development

The NDF unlike the planning policy in England does not have any policies to prevent back garden development. Gardens are important for all ages for people's health and wellbeing such as play areas for children and gardening for adults. In England gardens are seen as greenfield as opposed to brownfield sites which helps prevent gardens becoming small or virtually non-existent as a result of development in the garden. Infill development which are in line with the mass and density of the street scene and within the character of the density of the area in terms of plot size and gardens is not a problem, But squeezing an extra development in the front of a garden causes overdevelopment. In MCC policy DES1 is relevant particularly the paragraph making sure that the density of the development is in line with the character of the area and that is used as the yardstick.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No comments

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

No comments

14. Welsh Language

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

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comments

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. 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, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comments

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Copy of Response below to previous consultation on growth options for MCC- repeats some of response above but comments on growth as well.

Appendix 1- a copy of my response to the previous consultation by Monmouthshire County Council on growth and spatial options for MCC copied below in italics (italics in original changed to red):

Monmouthshire – Replacement Local Development Plan- Growth and Spatial

Options

General Comments

*In terms of an overview of the Growth and Spatial Options and Easy read guide, June 2019, I am concerned that the information is presented as if the growth of housing will result in the growth of jobs, when this is nothing more than a statistical outcome. Building houses and expecting young people will simply come or providing employment sites and waiting simply isn't any guarantee of anything at all. There are a variety of complex reasons why people choose to live where they do and rural areas generally attract older people and the cities younger people, if you look at the UK population statistics. One member has written in an email that this hypothetical and unproven link between houses and jobs **has been used I fear to frighten members into choosing high growth options.***

Whilst I appreciate that an Easy read guide only condenses the information, the longer document also presents this as an unevidenced link between jobs and housing, simply based on a statistical outcome.

Members were also told about the 10 or 11 per cent increase in the population in Monmouthshire from 2001 in both the member workshop and in the special Economy and Development Select Committee, implying that there was expected to be such increases in future and therefore a demand in housing required.

No mention is made of the fact that the population statistics show that the population projection is based on the population in Monmouthshire remaining flat lined until 2039 with little or no increases, suggesting that there is no demand for housing based on population projections, which are the basis of the ground rules for looking at housing demand for the next LDP.

In fact, many of the calculations and statistical workings on both growth and housing numbers appear to be based on the past information/assumptions in the June 2019, draft analytics edge analysis report, which I found on line.

Consultation response- general comments above (plus answer to the consultation questions below):

Growth Option

What is your preferred growth option and why?

The current LDP adopted in February 2014 in policy S2 is based on “Provision will be made to meet a requirement for 4,500 residential units in the plan period of 2011-2021. This need will be met by identifying opportunities for around 4,950 dwellings to enable a 10% flexibility allowance...”

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/455H3/QDB/Adopted-Local-Development-Plan-with-PDF-tags.pdf> (page 54).

In the workshop for members the figure of 4,950 was given despite the further report to council correcting the figure to 4,500. It is therefore assumed that the figures quoted in the growth options are the top figures allowing for this 10% flexibility in view of this figure being provided by the presentation from analytics edge who have been providing this information.

The population between 2001 and now has grown by about 10 or 11% but the latest 2014 ONS tables from the Welsh Government for population projections, replacing the 2008 figures in the link below show that the expected demographic change for Monmouthshire between now and 2033 is to be on a more or less flat level, there will be more 65 plus year olds but that is the demographic trend for the rest of the UK and particularly in rural local authorities which tend to have older demographics and not the same as city areas such as Cardiff.

<https://qweddill.gov.wales/docs/statistics/2016/160929-local-authority-population-projections-2014-based-en.pdf>

Cardiff is being used as a benchmark for our demographics, where there is a median age of 32, so that the information is not presented in a vacuum. However, it is a totally inappropriate benchmark/ comparison as Monmouthshire is a rural authority with small towns and villages not a city area.

Cardiff has a large population of students who are likely to be in the younger

age range and it has been estimated that they make up 20% of the population:

<https://www.walesonline.co.uk/news/local-news/students-make-up-20-cardiff-2028332>

Cardiff has a much higher foreign-born population than the rest of Wales with many of these who are younger:

<https://www.bbc.co.uk/news/uk-wales-26423124>

A phase 1 report on Cardiff's LDP from analytics edge stated that Net immigration is estimated to have contributed 60% of Cardiff's population growth since 2001, an average growth of +3,000 per year since 2003/4. <file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/IGO3/HAG/Cardiff%20LDP%20Population%20and%20Household%20Projections%20Phase%201%20Report.pdf> (see page 8).

Hence, comparing Monmouthshire demographic profile to Cardiff, a city in terms of demographics is like comparing chalk with cheese. Students, whilst age wise are counted as part of the working age population, will not actually be working due to being in full time education. It means that at least 20% of the working population age in Cardiff are not actually working but studying instead.

In addition, even with the current level of housing, the Labour statistics for 2018 show that there were about 2000 people in Monmouthshire wanting a job and presumably of working age. This illustrates that what matters is the availability of jobs not the working population demographics.

<https://www.nomisweb.co.uk/reports/lmp/la/1946157403/report.aspx>

The reply from the Head of Planning to my email following this member workshop says that. *I don't think that anyone is saying that new jobs will simply appear because extra houses have been built...*

However, this is how the consultation is presented, as if the number of homes directly relates to the number of jobs both in the easy read and the more detailed report even though the reply from the Head of planning indicates how growing jobs requires conscious effort and allocating employment land and just

waiting does not work. Option 1 on low growth requires no homes and says it loses 3,990 jobs but lacks evidence to support such a statement and is a statistical outcome only.

Option 1 is relevant to the WG population projections which predicts flat line population changes with the number of deaths exceeding the number of births. No analysis seems to have taken account of the vacant properties following on from probate which will allow for in migration without further house building based on existing housing stock.

The type of analysis produced may well be very much influenced by the briefing instructions given to the outside consultants and factors and assumptions in statistics can be challenged and re-adapted accordingly.

It is clear from the draft report from Edge Analytics that account has been taken of the BE Consulting report based on **accelerated growth**:

Edge Analytics Draft Report June 2019:

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/455H3/QDB/Edge-Analytics-LDP-Demographic-Evidence-DRAFT-v3-June-2019-Redacted.docx.pdf>

BE Consulting report link:

<http://democracy.monmouthshire.gov.uk/documents/s19318/1a%20Appendix%20B%20-%20Economies%20of%20the%20Future%20Strategic%20Direction%20Report%202018.pdf>

Edge Analytics has produced a draft report for 3 authorities, Monmouthshire, Torfaen and Blaenau Gwent, all of which are very different from one another, so again the benchmarks are questionable albeit there is a different analysis for each.

The Draft report for Edge Analytics states on page 14 that:

For Monmouthshire, the WG 2014-based 'Principal' projection estimates a of +0.8% (+726) increase over the 2018–2033 plan period, with population growth forecast to 2028, declining thereafter (Figure 15). Over the same period, the

WG 2008-based population projection estimated notably higher growth of +3.2% (+2,921), driven by assumptions on lower natural change.

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/455H3/QDB/Edge-Analytics-LDP-Demographic-Evidence-DRAFT-v3-June-2019-Redacted.docx.pdf>

The above quote showing how the WG 2008 based population estimates over-estimated population growth compared to the latest 2014 projections.

In simple terms, if we look at the WG population 2014 latest projection statistics themselves, some interesting facts emerge:

By the end of the projection period the number of authorities for which there were more deaths than births is projected to around two-thirds.

Monmouthshire

The population of Monmouthshire is projected to be broadly the same in 2039 as it is in 2014 (up by 100 or 0.1 per cent)...

<https://qweddill.gov.wales/docs/statistics/2016/160929-local-authority-population-projections-2014-based-en.pdf>

In 2018/19 the actual population of Monmouthshire was 92,931 and in 2019/20, 93,070 with a population change of just 139, representing just 0.15% change (South Wales Fire and Rescue Service Authority figures).

In view of these facts based on population projections over a long time period flattening out, there will be a need for about 50 new dwellings, as it is an average of about 2 people per dwelling, so option 1 is the nearest to this population projection figure.

It can be seen from the statistics including the variants for Monmouthshire from 2014/2015 to 2038/2039 there is little change in population itself:

<https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2014-based/populationprojections-by-localauthority-year>

<https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2014-based/populationprojections-by-localauthority-year>

[Migration/Population/Projections/Local-Authority/2014-based/populationprojectioncomponentsofchange-by-localauthority-year](https://stats.wales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2014-based/populationprojectioncomponentsofchange-by-localauthority-year)

<https://stats.wales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2014-based/populationprojections-by-localauthority-variant-year>

Hence, based on the lack of population growth then option 1 would appear to be the appropriate one.

The option 2 growth is based on demographic projections for the preceding 5 years. Again, it may be argued that this information may be inappropriate as in the past the population has increased, but it is set to flat line over this plan period.

Option 3 is based on housing completions in Monmouthshire in the last 15 years of 4,305 homes, again irrelevant in view of future population projections. In terms of option 4 it is unclear what is meant by underperforming economic sectors. As shown from the Labour statistics for 2018:

In terms of jobs, as can be seen from the Labour link below, we are already doing well in Monmouthshire. In 2018, 59% of the population are 16-64 compared to 61.5% in Wales, hardly any different. However, 80.5% are economically active compared to 76.7% in Wales and 78.5% in GB.

<https://www.nomisweb.co.uk/reports/lmp/la/1946157403/report.aspx>

Option 5 is based on mid growth of 5,790 houses which proposes Monmouthshire growth rate at a higher level than UK growth rates. The correct comparison is for the growth rate for Wales in the rural authorities, which is unpredictable in view of Brexit and its impact on the Welsh Economy. The recent changes being proposed in stamp duty if not changed in Wales will make Wales less attractive for house buying than England, as there will be no stamp duty up to a value of £500,000 in England.

<https://www.telegraph.co.uk/property/uk/would-boris-johnsons-stamp-duty-plans-mean/>

Stamp duty in Wales is currently only free up to £180,000.

<https://www.moneyadviceservice.org.uk/en/tools/house-buying/land-transaction-tax-calculator-wales>

The Higher growth options all have increased pressure on Monmouthshire's infrastructure and on Monmouthshire's landscape and biodiversity interests and the higher ones a challenge in reducing climate change. In view of the lack of infrastructure in the whole of Monmouthshire and even if this improves, it would take years, I would prefer option 2 of low growth as there is no evidence to say that there will be any more internal jobs and any more employment is likely to be on the basis of commuting to Bristol, Cardiff or Newport. Option 2 on low growth of 1,725 provides some housing due to the need for affordable family homes but taking account of the lack of infrastructure.

Option 2 would provide some scope for concentrating on the housing Monmouthshire needs but without compromising its infrastructure too much with careful planning on location. If the LDP requirements are specific enough, it may help with housing particularly as young couples need to have affordable 3-bedroom family homes and both single older and younger people need to have easy to manage 2-bedroom properties, due to the lack of availability of both warden assisted flats for the elderly and bungalows. A greater variety of well-designed buildings whether affordable or not would help the retired to down size freeing up larger properties for families. Hence whilst option 1 is appropriate option 2 would allow for some limited housing for those on the waiting list for affordable homes, whilst fully taking account of our very limited infrastructure capacity.

The link between jobs and houses is very complex and a statistical outcome is very unreliable and can vary according to the type of factors included in any methodology of these calculations. For example, in the last LDP Cardiff Council was unhappy with their WG (Welsh Government) population projections as being too high, so Edge Analytics challenged the WG population increase figures in order to lower the figures.

Hence the type of briefing impacts the statistical variables used and ones like Monmouthshire based on ambitious accelerated growth or using past house building and patterns will produce higher growth figures as opposed to one based on the future population projections, which is normally the method

used for housing growth need.

In other words, Edge Analytics, was requested by Cardiff Council to challenge the statistical methods used to estimate WG high population projections with a downward forecast for Cardiff due to readjustment of trend-based data, as can be seen in the following report link:

file:///C:/Users/cloui/AppData/Local/Packages/Microsoft.MicrosoftEdge_8wekyb3d8bbwe/TempState/Downloads/Cardiff-Council.pdf

This is explained by Edge Analytics in italics as follows:

An 'alternative' methodology for estimating international migration developed at the University of Leeds (and now being implemented by ONS) has adjusted 'recalibrated' recent mid-year estimates for Cardiff, resulting in a significant reduction in its trend-led growth projection. This reduction equates to a population, in 2026, that is 24k below the WAG estimate; approximately 10k fewer households. (Phase 2 report) in the link below:

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/F9D8JNYG/Cardiff%20LDP%20Population%20and%20Household%20Projections%20Phase%202%20Report.pdf>

Illustrating how statistics can be used and the methodology challenged and changed to suit the requested Local Authority requirements and objectives.

How will this growth option address the issues/challenges Monmouthshire is facing?

Growth option 2, low growth option will address the issues and challenges Monmouthshire is facing which will provide housing over and above the projected population growth. In addition, during the last LDP there were no infrastructure improvements. For example, the Mabey site in Chepstow in the LDP said that it was a site-specific requirement to make improvements to the High Beech roundabout no such improvements were made, so whatever the LDP says about infrastructure if the WG are not willing to finance, then such improvements are not worth the paper written on.

The idea is to provide more affordable housing for young people, yet the Mabey

site of about 320 houses in Chepstow will only provide 20 affordable houses due to viability arguments. In towns, even if 35% of affordable housing is provided such as the Caldicot recent site, then there is no contribution to major road infrastructure. Even a large development of 7000 homes on the outskirts of Cardiff was only providing some type of discounted travel vouchers. So even if there is a provision for some affordable housing provided on some sites, it will not make any difference whatsoever to the balance of the demographics as the largest percentage will be of larger private housing attracting those who have had previous properties elsewhere and likely to be of an older age.

The higher growth options are said to produce a better demographic in our population, however whilst the age of the population varies and is generally younger in cities due to the attractions such as jobs and night life, even there the working age population is set to be lower.

Even in a city such as Greater Manchester the population of 16-64 is set to fall by 2035 *Greater Manchester's economic development is supported by an increase in the local population. The total population is forecast to rise from 2,729,100 in 2014 to 2,943,700 in 2035, an increase of 214,600 people at an average growth rate of 0.4% per year. The number of working age residents, defined as those aged 16 to 64, is expected to fall modestly towards the end of the forecast period. By 2035, the working age population of Greater Manchester is forecast to be 1,746,400, 11,700 lower than in 2014.*

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/GYGN O19R/Oxford%20Economics%20report%20-%20An%20accelerated%20growth%20scenario%20for%20Greater%20Manchester.pdf> – (see page 7 even though rise in population).

The Labour statistics in 2018 showed that there were about 2000 people wanting a job in Monmouthshire, even with our current level of housing.

The reason for proposing option 2 is because as admitted in the email following the workshop from the Head of Planning wrote *...I don't think there is anywhere in the County with spare infrastructure capacity now that could accommodate future LDP growth without improvements of some sort.*

In my opinion, I also don't see developers who are paying for affordable

housing or the Welsh Government contributing to what is required, particularly with the emphasis on walking, cycling and public transport and not on road infrastructure.

In my opinion, building more housing will not solve the issue of an infrastructure at breaking point and simply add to the strain and severe traffic congestion, air pollution and lack of health facilities. The installation of charging points on each new house for electric cars is a good idea. However, electric cars are too expensive and they will still add to the traffic congestion queues and lack of local facilities.

The local people in Chepstow are of the opinion that Chepstow is already too full. Chepstow area already has sufficient development being undertaken between Chepstow in Gloucestershire and Lydney in Gloucestershire and no more development is needed here due to the strain on the Chepstow and surrounding area infrastructure. The Forest of Dean district council intend to concentrate on towns particularly Lydney but there is already house building being undertaken in Tutshill and Sedbury, Chepstow, adding thousands more houses to the local area and impacting the small town of Chepstow with its direct motorway link to Bristol.

Building more housing will also not solve the issue of a younger population as the whole of the demographics of the whole of the UK is getting older based on ONS data and older in the South West of England than elsewhere in England, so it is unclear where exactly these young people will come from.

In addition, there is absolutely no evidence that building housing for young people will mean that they will come as they may well be attracted to a city rather than rural location which appeals to younger people. Housing built for younger people may well be occupied by older people downsizing.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/july2017>

In terms of the older demographics of Monmouthshire, the population is younger in the city areas but places like the Forest of Dean are very similar to Monmouthshire in their predicted older demographics as is the rest of most of Wales, excluding Cardiff, but that already has a large non-working student

population in the working population age group.

If Monmouthshire wishes to solve its working age population then it needs to do so in a more imaginative way and if there are no local jobs then this will just increase unemployment. But if you need more workers then you have to use the ones you have already got and be more flexible in employment methods, helping the unemployed and disabled. Also, those over 50 face age discrimination and have difficulty finding work. The House of Commons report of 2018 states:

The UK population is changing. As the number of people aged 50 and over is growing, the population aged below 50 is projected to reduce significantly. Government research predicts that by the mid-2030s half of all adults in the UK will be over 50 years of age. By 2025 there will be 300,000 fewer UK-born under 30s. Any reduction in inward migration following the UK's exit from the EU will also mean fewer young workers. In contrast, the number of over 50s either working or available to work will grow by around one million by 2025. The UK economy is clearly becoming increasingly reliant on older workers. This has been recognised in the Government's Industrial Strategy, which identifies meeting the needs of an ageing society as one of four 'Grand Challenges', and commits the Government to support industry to adapt to an ageing workforce. Andrew Griffiths MP, Parliamentary Under-Secretary of State at the Department for Business, Energy and Industrial Strategy, acknowledged that keeping the skills of older people in the workforce is important for the future viability of the UK economy.

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/5A22IXDW/359.pdf>

If Monmouthshire really wants to solve its working population ageing then it needs to develop better employment strategies both for the council itself and with all local or future employers for the over 50s. The House of Commons paper suggests ways of doing so including giving care leave to look after ageing parents. There is not a massive pool of young people out there in the general demographics of the UK.

There is no evidence that houses equal jobs or simply building more houses

would solve the demographic problems which are evident in both Wales and the whole of the UK.

In view of simply allocating employment land and waiting does not help, then the most likely outcome of building more house is simply not more jobs but more commuting to Bristol, Newport and Cardiff adding to the existing MCC area infrastructure problems.

The best method of ensuring more affordable housing would be to build on the council's own brownfield sites such as Severn View Care Home (expected to relocate to Crick site) and Boverton House in Chepstow (currently for sale). Whilst it is said that there are few brownfield sites that argument fails to take account of the possibility that on those sites it is possible to build a number of units, bearing in mind that the Mabey site will only produce 20 dwellings. Both sites are in walking distance of the town centre. It is disappointing that the council has applied for planning permission in August for a large single residential house for the Boverton House site.

I agree with another member's opinion that *adopting a very risky strategy of high housing growth on the basis that 'if you built it, they will come' is not, in my opinion a sound or evidenced economic strategy for attracting high quality jobs.*

In my opinion the most likely outcome for Monmouthshire is building more houses and creating intolerable infrastructure problems based on an increased commuting population with few local employment opportunities. Hence the reason for choosing option 2 growth option.

There have been no council surveys of young people and there have been no council surveys of the type of affordable housing required in terms of bedroom size. Even home-grown young people won't stay in the local area if there are no jobs and they may prefer to live in city rather than rural areas. So, there is no evidence for the arguments being used.

The Higher growth options all have increased pressure on Monmouthshire's infrastructure and on Monmouthshire's landscape and biodiversity interests and higher ones a challenge in reducing climate change. In view of the lack of infrastructure in the whole of Monmouthshire and even if this improves, it

would take years, so to reiterate, I would prefer option 2 of low growth as there is no evidence to say that there will be any more internal jobs and any more employment is likely to be on the basis of commuting to Bristol, Cardiff or Newport.

Facilities and Infrastructure is key to all of this and we have already had a plan which builds/built more and more houses without any roads or other facilities and it is now creaking and at breaking point and significantly lowering the quality of life. To say this should be considered at a later stage as if growth options and spatial options can be considered in an isolated bubble is unrealistic.

I am also concerned about the South becoming an urban fringe of Bristol but even Bradley Stoke a soulless housing estate has decent infrastructure. It is all very well saying that only 3% of land in Monmouthshire is developed but 80% of that is already in the South. If in the midst of an urban area that is highly developed it might as well be in the middle of a city. The *raison d'être* for the attraction of Monmouthshire is because it's rural not because it is a suburb of Bristol. The green wedges are vitally important.

The character of Monmouthshire should not be destroyed or its nature fundamentally changed and its ambition should not be to become a suburb of Bristol.

Instead if Monmouthshire wishes to improve its economy then it simply could improve what it already has to offer in terms of tourism.

What is your preferred spatial option and why?

The consultation only asks about a limited number of spatial options, so limits the choice.

For example, there is no spatial option to show a preference for a new settlement in the North of the County, as Monmouth has good links to the Midlands motorway, whilst Monmouth developers have been prevented from building in that area because of the lack of sewerage capacity. However, if there was a new settlement in the North then the developer on a large development would have to pay for new sewerage infrastructure.

Also, in the North of the County, in relation to Abergavenny, the Heads of Valleys roads have been developed with good links. Chepstow is under particular strain from the toll removal with an immediate 23% increase in traffic on toll removal and more housing is already been developed on the Gloucestershire side of Chepstow and to have more housing from Monmouthshire without any infrastructure changes will simply bring Chepstow to a standstill.

The North part of the Borough does not have these new unique strains and neither does Usk which has good links to Newport and Usk town centre is in need of economic help to keep its high street going. Housing is also more affordable relative to Chepstow making it more attractive with the National Park area for more affordable housing near Abergavenny. People from Abergavenny commute as far as London or Bristol so it would be a mistake to concentrate on the M4 corridor.

My preferred spatial option is a **modified spatial Option 1** which excludes Chepstow and surrounding area, including making sure this also excludes the most sustainable rural settlements in Chepstow and surrounding area and the Crick and Portskewett area (which impacts Chepstow road infrastructure for traffic heading to the Severn Bridge for Bristol via the A48 Pwllmeyric) , because there is already sufficient development on the Gloucestershire side of Chepstow due to the removal of the Severn Tolls. It would then result in more of a concentrated development in the main towns in the North of the County.

Any area within a 15-mile radius of Chepstow is being impacted by the commute to Bristol. For example, the Raglan housing development was advertised with Bristol in mind. Traffic from Raglan would just end up joining the daily traffic congestion on St Lawrence Road to High Beech roundabout for the motorway and exacerbate existing traffic issues. The traffic impacts internal local jobs within Chepstow. For example, a local person who lives in Thornwell in Chepstow works in the main Tesco in town. If his shift starts at 6am he can get there but if it is 7am he has to drive all around the area to simply get to work.

I am opposed to a decision for a new settlement apart from in the North of the County on the basis of a new village there of up to 2000, as 2000 is the number

*of houses needed to build a community centre and primary school, like village tadpole near Swindon. However, If there is any decision for a new settlement anywhere in Monmouthshire then it is important that as it takes some time to develop that there is very limited building elsewhere in the same area due to infrastructure capacity issues **and that the road structure and capacity is provided first not just put as a paper requirement like the Mabey site.***

The call for candidate sites in February 2019 produced 3 potential new settlements in the following link:

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/PSD19LIH/New-Settlements-1.pdf>

They are all in the South of the Borough so would impact the traffic congestion and air pollution issues in Chepstow and surrounding area. Recent TV broadcasts are proposing that Wales should be using farms for growing fruit and vegetables in order for Wales to be self- sufficient in food production, for this to be locally grown to help combat Climate change. Council owned farms mapped as potential new settlements in this local area would be best used for this purpose rather than housing.

It is of concern that good agricultural land/ buildings which may be needed in the not too distant future is being changed in the local area to equestrian centres or employment uses as opposed to recognising the importance of Agricultural land being preserved as a finite resource for the future. (See paragraphs 3.54 and 3.55 of PPW Edition 10).

Chepstow already has an area of air pollution higher than city areas and the most polluted area in Gwent:

<https://www.southwalesargus.co.uk/news/16199662.chepstow-is-exceeding-air-pollution-limits-set-by-world-health-organisation>

<http://www.monmouthshirebeacon.co.uk/article.cfm?id=108117&headline=Chepstow%20near%20bottom%20in%20air%20quality%20rankings§ionIs=News&searchyear=2017>

The levels of air pollution in Chepstow is worse than in Bristol, Cardiff and

Newport.

<https://www.bbc.co.uk/news/health-43964341>

In addition, the A48 in Pwllmeyric has 100,000 vehicles a week and up to 165,000 have been recorded (presumably due to an event). The air quality in this area along the very busy A48 Pwllmeyric is now being monitored with results expected after April 2020. Road side levels will impact those waiting at the bus stop by school children and/or walking in the area and the WG planning policy encourages walking, cycling and public transport.

<https://www.theguardian.com/uk-news/2019/may/02/ella-kissi-debrah-new-inquest-granted-into-air-pollution-death>

Citizens in Wales and in Monmouthshire are entitled to breath clean air and further development will only result in an increase in traffic congestion and/or air pollution. The WG Planning Policy Wales Edition 10 has a whole section on air pollution and recommends this being used in the location of sites for development and to even refuse planning permission. Air quality is a material planning consideration which needs to be taken seriously by the Council. Unlike smoke, toxic particles in the air are invisible but can still have an impact on health and wellbeing.

<file:///C:/Users/cloui/AppData/Local/Microsoft/Windows/INetCache/IE/N8EIA69Y/planning-policy-wales-edition-10.pdf> (PPW Edition 10- see pages 152 to 158,)

Some relevant quotes from PPW Edition 10 below:

6.7.2 National air quality objectives are not 'safe' levels of air pollution¹⁴⁴. Rather they represent a pragmatic threshold above which government considers the health risks associated with air pollution are unacceptable. Air just barely compliant with these objectives is not 'clean' and still carries long-term population health risks. Nitrogen dioxide and particulate matter, which are the pollutants of primary national concern from a public health perspective, currently have no safe threshold defined and therefore the lower the concentration of those pollutants the lower the risks of adverse health effects. It is desirable to keep levels of pollution as low as possible.¹⁴⁵ 1

6.7.12 Planning authorities must consider current and future sources of air and noise pollution as part of developing their strategies for locating new development.

6.7.14 Proposed development should be designed wherever possible to prevent adverse effects to amenity, health and the environment but as a minimum to limit or constrain any effects that do occur. In circumstances where impacts are unacceptable, for example where adequate mitigation is unlikely to be sufficient to safeguard local amenity in terms of air quality and the acoustic environment it will be appropriate to refuse permission.

How will this spatial option address the issues/challenges Monmouthshire is facing?

In view of these factors and the corporate policy of the council and part of planning law to improve health and well-being to improve climate change, the modified spatial option 1 chosen appears to assist.

In summary, my preferred growth option is option 2 of 1,750 houses and modified spatial Option 1 which excludes Chepstow and surrounding area, including making sure this also excludes the most sustainable rural settlements in that Chepstow and surrounding area, as well as Crick and Portskewett because there is already sufficient development on the Gloucestershire side of Chepstow.

The reason for this spatial option addressing the issues and challenges in Monmouthshire is because there has been no infrastructure improvements in the last plan with 4,500 houses planned for/ built and it is likely to be a substantial time before there will be any improvements and any such improvements will only help alleviate existing problems, building more housing will just add to the traffic congestion issues and lack of facilities and health services, particularly in the South of the Borough.

Monmouthshire will not attract more young people because rural local authorities simply as part of their character have older populations, it is

unlikely to attract more internal jobs and more likely to ruin Monmouthshire by making it a commuting zone for Bristol and a suburb of it.

One of its greatest assets is the tourism industry and this relies on beautiful landscapes and the rurality of the area. Improving that side would help the Economy of Monmouthshire much better than building more and more housing.

It is of interest to note that the last LDP mentioned exactly the same issues on pages 39 and 40 including house prices, affordable homes, ensuring sufficient working population and more opportunities for young people to stay and move to the area, which 4,500 houses in the last plan clearly failed to address.

However, the current LDP did mention in paragraph 3.59 on page 32 that in terms of tourism there were over 2 million visitors to the County in 2012, with tourist expenditure amounting to nearly £158m thereby supporting 2,700 jobs. This tourism economy will be under threat if Monmouthshire becomes a suburb of Bristol. The alternative of promoting tourism would provide a better health and wellbeing outcome for the Economy of Monmouthshire than simply building more houses.

I support a member comment who wrote in an email that:

I appreciate that we all have different 'ambitions' for Monmouthshire, and mine is that none of the County, particularly the south, becomes one continuous swathe of houses and industry, so that it looks like the urban fringe of Bristol, Newport or Cardiff. I am therefore 'allergic' to anything that contributes to that likelihood!

16. Are you...?

Providing your own personal response- yes	<input checked="" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here –yes remain anonymous but happy to be quoted with local concerns.	<input checked="" type="checkbox"/>
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