

rLDP Nutrient Neutrality Support

Task 7 Nutrient Management Action Plan

Monmouthshire County Council

| ~~August-September~~ 2026 Update

Quality information

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1. Introduction

The Inspectors appointed to examine the Monmouthshire County Council (MCC) Replacement Local Development Plan (rLDP) have requested additional information on the Council's approach to addressing the effect of proposed development in the rLDP on riverine Special Areas of Conservation (SACs) in relation to the discharge of phosphorus. The affected riverine SACs are the River Wye and River Usk sites.

In February 2026, MCC commissioned a study to estimate the potential increase in nutrient (phosphorus) loading from implementation of the rLDP. This study has been published within the Monmouthshire Replacement Local Development Plan 2018-2033 – Phosphate Position Paper (April 2026)¹. The determination of phosphorus budgets was undertaken for all allocated and committed development in both the River Usk and River Wye catchments, with results presented on a 'year by year' basis. As this study concluded that there will be an excess of phosphorus from foul wastewater from the proposed developments, mitigation will be required to ensure that the rLDP can be considered nutrient neutral (i.e. the developments do not contribute additional phosphorous loads to the River Wye SAC or River Usk SAC sites). Further details of the SAC sites are provided in Section 2.

This document sets out an initial Action Plan (AP) that MCC will implement and deliver in order to ensure that the rLDP can be enacted alongside the necessary reductions in phosphorous. The AP should be read in conjunction with the Strategic Mitigation Opportunities Report, which seeks to further develop the understanding of feasible, strategic mitigation opportunities and pathways within the affected catchments in Monmouthshire.

1.1 Aims and Objectives

The AP aims to set out the mitigation pathways and associated requirements that ensure that nutrient mitigation can be implemented and secured when needed, demonstrating that the rLDP is deliverable in line with its milestones.

The Welsh Government have recently (March 2026) provided a clarification note on how "*Tests of Soundness*" should be applied to LDPs where the impact of additional nutrients on SAC's has been identified². This guidance indicates that an indicative mitigation action plan should include the following information:

- An estimate of the impacts arising from the plan proposals (see summary in **Section 3**);
- An estimate of the improvements from existing and future measures necessary to avoid further deterioration of the SAC, including from plan proposals (see **Section 3**).
- The securing of the appropriate steps to be taken including appropriate delivery mechanisms (see Section 4 and 6) and agreed milestones (see details of timescales in **Section 5 and 6**).
- Identifying integrated mitigation where this can be secured and appropriate developer contributions identified (which is interdependent with the on-going steps and measures) (see **Section 4 and 6**).
- Clear monitoring framework for implementing policies and proposals relative to the adaptive management framework (see **Section 6**).

In achieving these objectives, the MCC Nutrient Management AP has been developed to:

- Be **Outcome focused**.
- Outline a **phased programme** of necessary steps for each mitigation measure taken forward, with **indicative timing** outlined for each step (e.g. short-, medium-, long-term).
- Set out **details of engagement required with delivery partners** (and at what point in the process).
- Describe likely **funding routes** and **delivery mechanisms**.

¹ Monmouthshire County Council. April 2026. Monmouthshire Replacement Local Development Plan 2018-2033 – Phosphate Position Paper. 60pp. Available at: [Monmouthshire-Phosphate-Position-Paper-Update-April-2026.pdf](#) [Accessed on 30/07/2026]

² [Clarification note: applying the tests of soundness to Local Development Plans \(LDPs\)](#)

- Include information on each strategic measure to be taken forward, including information on **indicative costs for strategic mitigation solutions**, expected phosphorous reduction, and governance responsibilities.
- Include a prioritisation framework of actions (using a Red-Amber-Green system).
- Consider what **monitoring and review arrangements** are required.

Figure 1 shows the elements that constitute a robust action plan, which have been incorporated herein:



Figure 1 Elements forming a robust Action Plan

1.2 Approach

The AP is based on the current understanding of the situation within Monmouthshire and current nutrient management policy and guidance in Wales, most notably the following:

- [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation.](#)
- Welsh Government / [Clarification note: applying the tests of soundness to Local Development Plans \(LDPs\).](#)
- Welsh Government / [Planning Guidance - Development in SAC Rivers.](#)
- Welsh Government Position Statement (June 2026) Monmouthshire County Council Replacement LDP – Nutrients.

Nonetheless, the guidance and AP requirements around nutrient neutrality continue to evolve, and as such the AP will be reviewed and updated periodically where necessary. This will be undertaken **annually** by MCC.

The AP has been developed collaboratively with partners, including MCC, Dwr Cymru Welsh Water (DCWW), Natural Resources Wales (NRW), and Nutrient Management Boards (NMBs) supported by a workshop with AECOM consultants on 15th April 2026. MCC intend to continue collaboration with regulators, delivery partners and potentially landowners and developers through delivery of the AP to ensure the efficient implementation of actions to enable development outlined within the rLDP to come forward (see Figure 2).

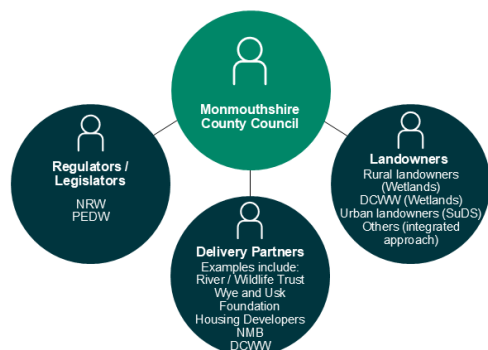


Figure 2 Organisations involved in delivery of the AP

2. Southeast Wales designated sites

2.1 Overview

The affected riverine SACs in Monmouthshire to which the nutrient neutrality principles apply are the River Usk SAC and the River Wye SAC. Figure 3 illustrates the location of the two SACs, along with their phosphorus nutrient neutrality catchment, and the Local Planning and National Park Authority boundaries.

The River Wye SAC is the largest Welsh SAC river, with its catchment divided into 43 Water Framework Directive (WFD) water bodies in Wales, while the River Usk SAC consists of 23 WFD water bodies. Both SACs are designated under the Conservation of Habitats and Species Regulations 2017³ for the protection of Annex I habitats and Annex II species.

In January 2021, NRW published a report that presented the assessment of compliance against recently tightened phosphorus water quality targets for SAC rivers⁴. The report showed that over 60% of SAC water bodies were failing the new targets for phosphorus.

Within the Usk 88% of its water bodies were failing for phosphorous. As a result, new developments leading to an increase in phosphorus discharges to this site may contribute to the unfavourable condition of the designated site or make its restoration to favourable status more difficult to achieve. This is typically undertaken as part of a Habitat Regulations Assessment supported by Nutrient Neutrality and Mitigation Assessments.

Whilst previously failing (2021) the Lower River Wye is now considered by NRW (as of 2026) to no longer be failing for phosphorus. However, it is still important that any new development that may lead to an increase in phosphorous discharged to the SAC considers whether that discharge would risk causing deterioration of the river back to less than good conservation status.

Further details for the two riverine SACs are provided in 2.1.1 (River Usk) and 2.1.2 (River Wye).

³ Participation, E. (no date) The Conservation of Habitats and Species Regulations 2017. Statute Law Database. Available at: <https://www.legislation.gov.uk/ukSI/2017/1012/contents> (Accessed: 8 January 2026).

⁴ Natural Resources Wales / Compliance Assessment of Welsh River SACs against Phosphorus Targets (2021). Available at: [compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf](#) (Accessed: 13 April 2026).

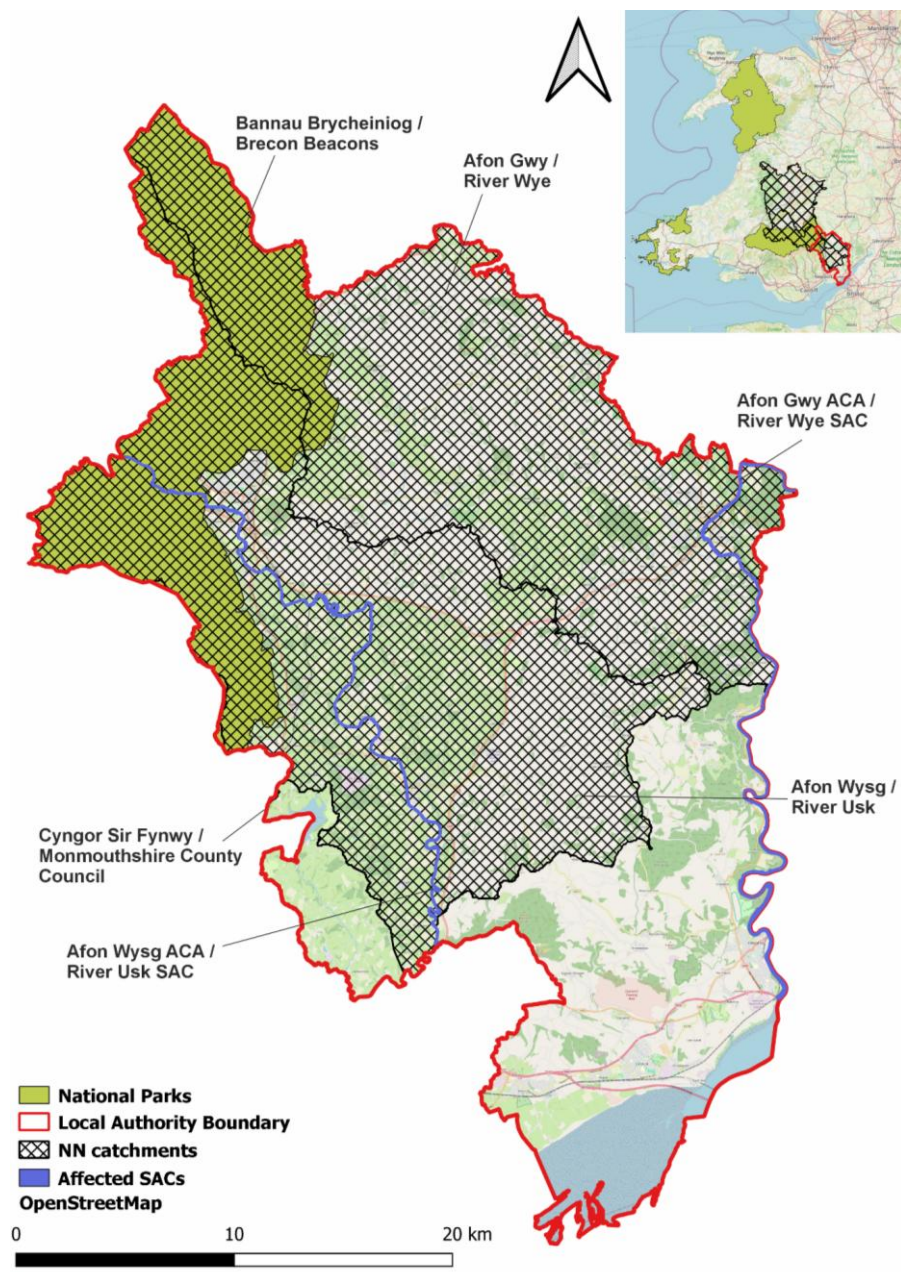


Figure 3 Location of the two riverine SACs in South East Wales (River Usk SAC and River Wye SAC) where phosphorus pressures have contributed to unfavourable site conditions (source: Welsh Government Data Map Wales online data)

2.1.1 River Usk SAC



Figure 4 River Usk at Usk Island⁵

Summary Description	The Usk is a medium sized catchment in southeast Wales with a primarily sandstone geology and frequently carries heavy sediment loads following periods of rainfall⁶. The Usk is by some distance the worst performing SAC river in Wales with respect to its phosphorus targets and is the only river where there are extensive failures in the headwaters.
Annex I habitats that are a primary reason for designation⁷:	• Not Applicable
Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site⁷:	• Watercourses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation
Annex II species that are primary reason for selection of this site⁷:	• Sea lamprey (<i>Petromyzon marinus</i>) • Brook lamprey (<i>Lampetra planeri</i>) • River lamprey (<i>Lampetra fluviatilis</i>) • Twait shad (<i>Alosa fallax</i>) • Atlantic salmon (<i>Salmo salar</i>) • Bullhead (<i>Cottus gobio</i>) • Otter (<i>Lutra lutra</i>)
Annex II species present as a qualifying feature, but not primary reason for designation⁷:	• Allis shad (<i>Alosa alosa</i>)

⁵ Monmouthshire County Council (2025). Available at: <https://www.monmouthshire.gov.uk/our-main-parks-and-gardens/#Usk> (Accessed: 14 April 2026).

⁶ Natural Resources Wales (2021). Compliance Assessment of Welsh River SACs against Phosphorus Targets. Available at: <https://cdn.cyfoethnaturiol.cymru/693025/compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf?mode=pad&md=132557227300000000> (Accessed: 14 April 2026).

⁷ River Usk / Afon Wysg - Designated Special Area of Conservation (SAC) (no date). Available at: <https://sac.jncc.gov.uk/site/UK0020020> (Accessed: 14 April 2026).

2.1.2 River Wye SAC



Figure 5 River Wye at Bigsweir⁸

Summary Description	The Wye is the largest SAC river, with a catchment covering much of southern Powys and part of the Bannau Brycheiniog National Park before crossing the border into England. Much of the Upper Wye catchment is rural and until recently has been predominantly farmed for sheep and cattle. More recently there has been a rapid expansion of poultry units, which has been the source of public concern ⁶ .
Annex I habitats that are a primary reason for selection of this site⁹:	Watercourses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation
Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site⁹:	Transition mires and quaking bogs
Annex II species that are primary reason for selection of this site⁹:	- White-clawed (or Atlantic stream) crayfish (<i>Austropotamobius pallipes</i>) - Sea lamprey (<i>Petromyzon marinus</i>) - Brook lamprey (<i>Lampetra planeri</i>) - River lamprey (<i>Lampetra fluviatilis</i>) - Twaite shad (<i>Alosa fallax</i>) - Atlantic salmon (<i>Salmo salar</i>) - Bullhead (<i>Cottus gobio</i>) - Otter (<i>Lutra lutra</i>)
Annex II species present as a qualifying feature, but not primary reason for site selection⁹:	Allis shad (<i>Alosa alosa</i>)

⁸ Monmouthshire County Council (2025). Available at: https://www.monmouthshire.gov.uk/2025/03/mcc-welcome-investment-to-transform-the-river-wye/river-wye-at-bigsweir_14589368845_o/ (Accessed: 14 April 2026).

⁹ River Wye / Afon Gwy- Designated Special Area of Conservation (SAC) (no date). Available at: <https://sac.jncc.gov.uk/site/UK0012642> (Accessed: 14 April 2026).

3. Context and Progress to Date

3.1 Potential rLDP Nutrient Load Impact

In February 2026, MCC commissioned a study to estimate the potential increase in phosphorus loading from implementation of MCC rLDP. This phase of work included three tasks:

- **Task 1** – Nutrient budget calculations for committed/allocated developments in the Usk/Wye catchments.
- **Task 2** – High level review of non-residential development and its potential impacts on designated sites.
- **Task 3** – High level review of mitigation options available in the affected catchments.

The allocated and committed development sites within each catchment considered in these initial nutrient budget estimates are shown in Figure 6.

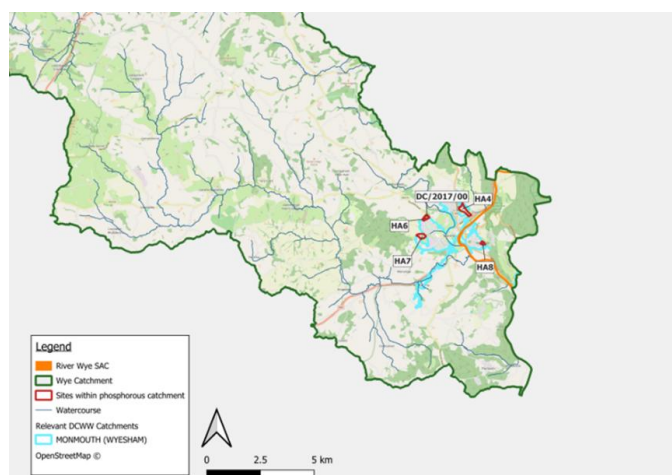
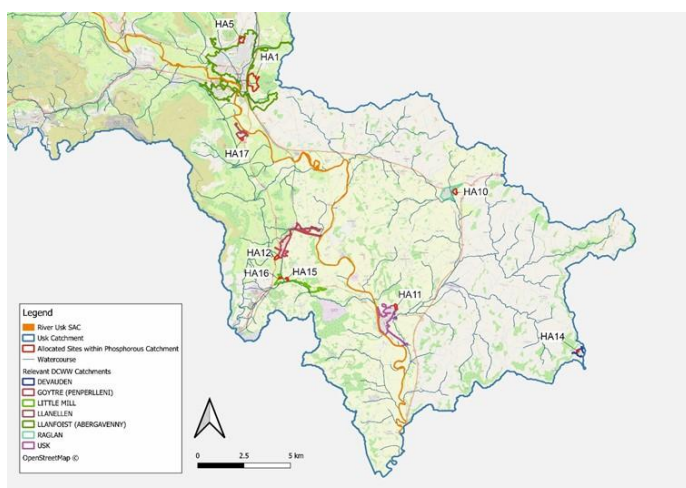


Figure 6 Allocated sites within the Usk SAC catchment (top) and Wye SAC catchment (bottom)

The final cumulative nutrient budget for each catchment under two scenarios is presented in Table 1:

- **Scenario 1 (Worst Case Scenario)** – Includes all housing types with no reduction in occupancy for affordable homes.
- **Scenario 2 (Best Case Scenario)** – Discounts 50% of affordable homes on the basis that half of allocated affordable homes are provided to local people who are likely to already be living within the nutrient neutrality catchment.

For both scenarios and both catchments, the proposed development allocated in the rLDP plus any committed development results in the generation of excess phosphorus (via foul wastewater). Significantly more phosphorus requires mitigation in the Usk catchment compared with the Wye, reflecting the quantum of proposed development in each catchment (see Table 1).

Table 1 Summary results for the final nutrient budget in each catchment in 2033

Scenario	Usk Nutrient Budget 2033 (kg/yr TP)	Wye Nutrient Budget 2033 (kg/yr TP)
Scenario 1 (Worst-Case Scenario)	265	136
Scenario 2 (Best-Case Scenario)	199	103
<i>Nutrient budget if proposed AMP8 phosphorus removal upgrades to WwTW had not taken place</i>	534	136

3.2 Lower Wye ‘No deterioration’ Investigation

As mentioned earlier, the Lower River Wye is no longer failing for phosphorus, and so MCC have undertaken an investigation for this river to determine whether the development proposed in the rLDP risks causing deterioration of the river to less than good conservation status.

To achieve this, it was necessary to determine the effect on phosphorus concentrations in the Lower Wye from the projected increase in phosphorus load arising from the rLDP proposed developments. Only the additional input via Monmouth WwTW (at SO 51532 11795) was required to be considered, as all the allocated or committed development sites in the Lower Wye catchment fall within this WwTW catchment. The location of data used in the assessment is provided in Figure 7.

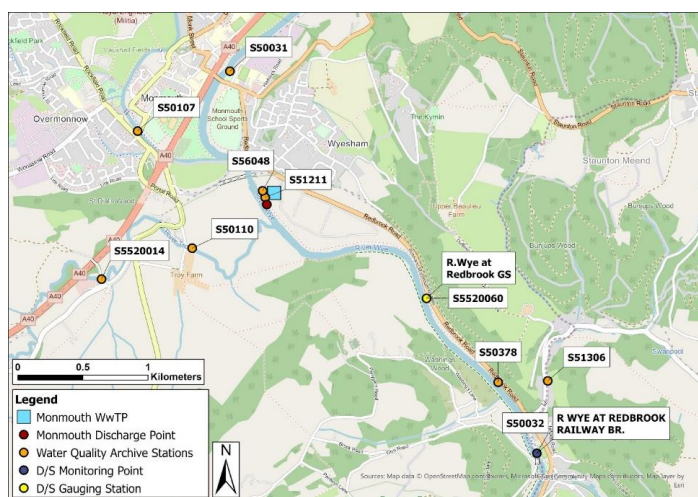


Figure 7 Monmouth WwTW and nearby water quality and flow monitoring stations.

The assessment concluded that when allowing for the maximum planned level of development (by 2033), the additional TP loading projected (i.e. 135.61 kg/year) would result in an estimated additional 0.13 mg/l TP in the average discharge concentration at Monmouth WwTW. This would increase the average discharge concentration to around 1.3 mg/l, which remains well within the permitted concentration of 2 mg/l.

The SAC Condition Assessment⁴ is based on Monmouth WwTW operating under current permitted conditions for concentration and flow. As development comes forward in the future validation assessments will be required to confirm this initial assessment, reflecting on the phosphorus Environmental Quality Standard (EQS) for the Wye at that given point in time.

A precautionary mass balance calculation was also undertaken, which indicated that an exceedance of the phosphorus EQS downstream of Monmouth WwTW would not be predicted based on the rLDP delivery. The receiving water is estimated to maintain good WFD status for Soluble Reactive Phosphorus (SRP) and therefore be at favourable conservation status even if the following worst-case assumptions are applied:

- Effluent flow is modelled as five times the DWF (dry weather flow).
- Effluent concentration is continuously at the permit threshold (i.e. 2 mg/l).
- The predicted dilution in the river is halved.
- All total phosphorus becomes available as SRP.

The report concludes that in principle the quantum of rLDP proposed development in the Lower Wye catchment can be delivered without resulting in a significant increase in phosphorous or a reduction in the conservation status of the SAC. However, it was also stated that these conclusions should be reviewed over time to confirm the receiving water remains at low risk in the context of evolving inputs to the river system as a whole. Therefore, future planning applications for allocated development are still likely to need to be supported by site specific Habitat Regulations Assessments including consideration of water quality risks to the Wye SAC. MCC propose to develop guidance to assist developers with these assessments, and this is a commitment included later in this AP (see also **Section 3.4**).

3.3 Strategic Mitigation Options Report

MCC have produced a Strategic Mitigation Options Report, which can be read in conjunction with the AP. This report considers in further detail the pathways available for delivering nutrient mitigation at a strategic scale for the rLDP developments, taking into account Welsh Government guidance for delivering mitigation in SAC river catchments¹⁰. The report includes consideration of the threshold (*de minimis*) approach, an integrated approach, developer led approach, and development of strategic solutions based on short-listing of potential options that are applicable in Monmouthshire. These approaches are also introduced in Section 3 of this AP. The most viable strategic mitigation option is currently considered to be construction of treatment wetlands. The viability and steps involved in taking strategic approaches forward are included at a high level in the AP but detailed further in the Strategic Mitigation Options Report.

3.4 ~~Developer Mitigation Handbook~~ Monmouthshire Phosphorus Strategy and Mitigation Supplementary Planning Guidance (SPG)

MCC are planning to produce a [Phosphorus Strategy and Mitigation Supplementary Planning Guidance \(SPG\)](#) which will ~~include a be~~ comprised of two elements. ~~Firstly, it will set out the Council's Strategy for development within the River Wye and River Usk Catchments in accordance with RLDP Policy NR3. It will also provide a~~ Developer Mitigation Handbook ~~setting out potential mitigation solutions, where required. This can be used by developers to better understand the range of mitigation options available for phosphorus where required, and how to implement these. This will be similar to the recently published Handbook prepared for Marine SACs by affected local authorities but led by Carmarthenshire County Council¹¹.~~

¹⁰ [Planning Guidance - Development in SAC Rivers](#)

¹¹ [Report Marine and Estuarine DIN Mitigation Strategy 2025-11-20](#)

The [Developer Mitigation HandbookSPG](#) will be a key document for the AP as it will outline further details that will allow different mitigation approaches to be taken forward, whether it be threshold, integrated catchment improvements, strategic or developer led nutrient neutrality approaches. The aim of the document is to provide:

- A planning guidance document for developers and Council Planning Officers alike on phosphorus mitigation for delivering nutrient neutrality development within the River Usk SAC and River Wye SAC catchments where needed. Guidance will be aligned with Welsh Government's latest guidance and All Wales nutrient budget calculator, and NRW's latest guidance.
- Specific guidance to developers in the Lower Wye catchment as to how to confirm that their proposals align with 'no deterioration' as discussed in Section 3.2.
- Clarity on how the threshold (*de minimis*) approach may be applied to the rLDP as a whole, based on further consultation with NRW.
- An outline of the integrated approach and how it might be applied in Monmouthshire. The initial draft of the Handbook is likely to detail the steps being undertaken to develop a mitigation pathway through the integrated approach. However, the Handbook should be updated regularly as a 'live' document in order to allow further guidance to be applied when available. For example, once established the Handbook could include links to a developer platform hosted on the MCC website through which developers could make positive contributions to restoration/improvement schemes.
- For developer led mitigation, the Handbook will contain a 'step by step' process showing when nutrient neutrality screening and assessment should occur within the planning process, how to identify and develop suitable mitigation measures, how they can be secured, and any subsequent monitoring that might be required.
- Building on NRW's Mitigation Menu, the [Developer Mitigation HandbookSPG](#) will include an overview of on-site and off-site mitigation options relevant to proposed development, including for example urban and rural SuDS, constructed and other wetlands, land use change, septic tank/PTP upgrades and water efficiency options. Measures will usually need to qualify as Article 6(3) interventions under the Habitats Regulations¹² rather than Article 6 (2) measures for developer led mitigation, consistent with NRW guidance on additionality and effectiveness at the time of assessment.
- Worked examples to show how to estimate phosphorous reductions from some of these measures alongside outputs from the Welsh Government nutrient neutrality calculator or bespoke calculations.

¹² [The Conservation of Habitats and Species Regulations 2017](#)

4. Mitigation Pathways

The Welsh Government guidance for mitigation of phosphorus in river SACs (2025)¹³ and the recent guidance on "Tests of Soundness"² 2026) indicates pathways of mitigation that may be applied to LDPs where the impact of additional nutrients on SAC's has been identified. NRW have also provided guidance with regard to mitigating nutrients within SACs (2026)¹⁴. Within these guidance documents are several hierarchal approaches (or 'pathways') to mitigation, through which it would be feasible to mitigate the phosphorus loads associated with the rLDP, thereby providing confidence that no adverse effects on the site integrity of the SACs would occur (see Figure 8). This section introduces the main 'pathway' approaches at a high level, before outlining the key steps proposed for their implementation in the AP in Section 5.

In keeping with the Welsh Government's Position Statement Monmouthshire County Council Replacement LDP – Nutrients (June 2026), where nutrient mitigation is required, the preferred pathway is the integrated approach as this presents greater opportunities for environmental enhancement as well as mitigating any increased nutrient impact from proposed new development. This position statement notes the inherent uncertainty in this approach at this stage of rLDP development, but acknowledges that this is not unusual, and should not prohibit this option being promoted as the preferred pathway. The policy caveat approach provides a suitable mechanism to establish a framework for the implementation of the integrated approach whether that is through the Catchment Nutrient Recovery Plans (CNRP) being developed by NRW or other nutrient reducing management measures being delivered through existing established bodies (e.g. Nutrient Management Boards (NMBs)) and organisations.

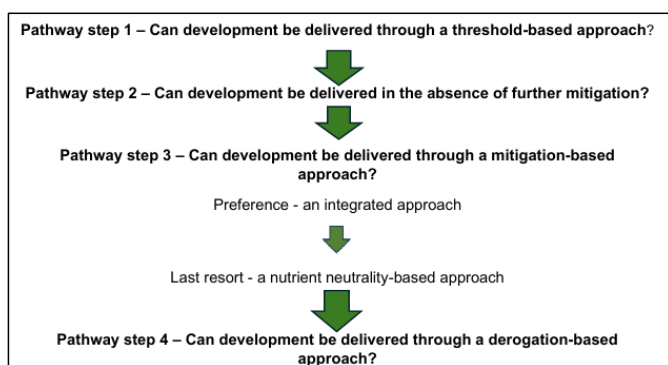


Figure 8 Hierarchal pathways to mitigation²

4.1 NRW Review of Consents and screening against WwTW Upgrades

Prior to considering mitigation pathways, it is notable that the current NRW guidance⁷ suggests that if the relevant WwTW for proposed developments has an environmental permit that has been reviewed against the nutrient targets set out in the conservation objectives for the river SAC, it may be possible for a planning authority to conclude that there will be no likely significant effect with regard to phosphorus. Further mitigation can therefore be 'screened out'. This may be the case provided that:

- The WwTW is operating in compliance with the permit conditions.
- The WwTW has capacity to receive and treat the additional volume of wastewater within permit limits.

However, it is only possible to make these conclusions where:

- The WwTW is discharging into a water body that is meeting water quality targets for phosphorus and all downstream river water bodies are also meeting their phosphorus targets, **OR**:

¹³ [Planning Guidance - Development in SAC Rivers](#)

¹⁴ [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#)

- Consultation with NRW and DCWW confirms that:
 - i) the final effluent phosphorus limits for the WwTW have been reduced through recent review.
 - ii) the WwTW was previously operating with phosphorus load higher than can be discharged under revised permit limits.
 - iii) the works will be operating within reduced limits at commencement of occupation¹⁵.

The information currently known about relevant WwTW permit limits in the context of these requirements for the Usk SAC catchment is summarised in Table 2. All of the sites listed are allocated in the rLDP.

Table 2 Review of proposed permit limit upgrades at WwTW within the River Usk Catchment

rLDP Policy Rep	Site Name	WwTW	Consultation with NRW & DCWW confirms that the final effluent P limits for the WwTW have been reduced through recent review?	The WwTW was previously operating with P load higher than can be discharged under revised permit limits?	The works will be operating within reduced limits at commencement of occupation?	Permit Upgrade Date
HA1	Land to the East of Abergavenny	Llanfoist	Yes	Yes	Yes	31/12/2025
HA5	Land at Penlanlas Farm	Llanfoist	Yes	Yes	Yes	31/12/2025
HA10	South of Monmouth Rd	Raglan	Yes	Yes	Yes	13/04/2023
HA11	Land East of Burrium Gate	Usk	Yes	Yes	Yes	12/12/2023
HA12	Land West of Trem yr Ysgol	Goytre	Yes	Yes	No	31/03/2030
HA14	Land at Churchfields	Devauden	Yes	Yes	Yes	26/01/2027
HA15	Land East Little Mill	Little Mill	Yes	Yes	Yes	07/02/2024
HA16	Land North of Little Mill	Little Mill	Yes	Yes	Yes	07/02/2024
HA17	Land adjacent Llanellen Court Farm	Llanellen	Yes	Yes	Yes	15/02/2024
N/A	Windfall Allowance	Llanfoist	Yes	Yes	Yes	31/12/2025
N/A	Windfall Allowance	Raglan, Usk, Goytre	Yes	Yes	Yes	15/02/2024

The information currently known about relevant WwTW permit limits in the Wye SAC catchment is summarised in Table 3. All sites are allocated in the rLDP except HA7, HA8, and the committed development West of Rockfield Road, which are rollover allocations already with planning permission.

¹⁵ NRW (2026) Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation Available at: [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#).

Table 3 Review of proposed permit limit upgrades at WwTW within the River Wye Catchment

RDP Policy Ref	Site Name	WwTW	Consultation with NRW & DCWW confirms that the final effluent P limits for the WwTW have been reduced through recent review?	The WwTW was previously operating with phosphorous load higher than can be discharged under revised permit limits?	The works will be operating within reduced limits at commencement of occupation?	Permit Upgrade Date
HA6	Land at Rockfield Road	Monmouth	Yes	Yes	Yes	13/11/2023
HA4	Land at Leasbrook	Monmouth	Yes	Yes	Yes	13/11/2023
HA7	Land at Drewen Farm	Monmouth	Yes	Yes	Yes	13/11/2023
HA8	Tudor Road, Wyesham	Monmouth	Yes	Yes	Yes	13/11/2023
N/A	West of Rockfield Road	Monmouth	Yes	Yes	Yes	13/11/2023
N/A	Windfall Allowances	Monmouth	Yes	Yes	Yes	13/11/2023

DCWW provided data and through further discussion it was determined that all relevant WwTWs for the rLDP have had their final effluent phosphorus limits reviewed against the nutrient reduction targets set out in the conservation objectives for the respective SAC catchments. Nearly all will have reduced permit limits in place by 2030, with most already operating under tightened limits. The exception is Goytre WwTW, which will not be upgraded until 2030. However, only allocated site HA12 which proposed 42 dwellings would be served by Goytre. Devauden WwTW is not due to be upgraded until January 2027 but will be by the time of plan adoption. **Thus, on this basis, there would appear to be potential to conclude that for all proposed development other than HA12 there will be no likely significant effect on SAC site integrity with regard to phosphorus, subject to reaching such agreement with NRW.**

MCC will continue to engage with NRW to determine which WwTW catchments are considered appropriate to conclude no likely significant effects on SAC site integrity on the basis of the above criteria. Further mitigation would only be necessary where this conclusion cannot be agreed with NRW. The continued work in this regard is incorporated in the AP in Section 5 and it is anticipated that the [Developer Mitigation Handbook SPG](#) will include guidance on which WwTW catchments can be screened out of further mitigation.

4.2 Threshold Approach / De Minimis

The Welsh Government clarification note² suggests that the first consideration with regards to mitigation pathways for nutrients (where significant effects on site integrity cannot be ruled out on the basis of WwTW upgrades) is whether it may be possible in some cases to screen out a certain quantum of development as being *de minimis*, i.e. the nutrient loading from the development falls beneath a defined threshold whereby plan proposals will not have any meaningful influence over the achievement of the conservation objectives for the SAC. Definition of any such threshold must be supported by relevant evidence and assessment² and be sufficiently certain.

Welsh Government guidance is clear that a threshold-based approach on a project-by-project basis is not advised. The cumulative effect of policies and proposals must be taken into account, and so consideration of whether development can be regarded as *de minimis* must be undertaken in terms of the scale of implementation across the whole plan period (through to 2033) and necessarily will inform the appropriate assessment.

HRA '*de minimis*' thresholds are therefore anticipated to be derived on the basis of an overall quantum of development over a defined timeframe. A threshold-based approach may be combined with a wider integrated approach (see next sub-section) across an area in the rLDP, reflecting catchment specific characteristics and circumstances. Case studies are given in the recent Welsh Government clarification note on tests of soundness.

To agree a threshold approach planning authorities will need to be satisfied that the additional loading from the rLDP will not undermine the achievement of the conservation objectives. In other words, the additional loading

will not exert any meaningful influence over the effectiveness of action to be taken to achieve the conservation objectives or otherwise delay the achievement of such objectives.

No thresholds for *de minimis* have been determined for the Usk and Wye catchments at this stage, nor for other catchments affected by nutrient issues in Wales (at the time of writing). It remains uncertain as to how such a threshold can be robustly defined and defended. Nonetheless, the AP has included an action for MCC to explore this approach further with NRW to determine whether this is potential for development of a threshold, where it can be sufficiently supported with evidence.

4.3 Integrated Approach

Where it is not possible to define a *de minimis* threshold and development requires mitigation, the Welsh Government clarification note on applying the Tests of Soundness to LDPs and Position Statement to Monmouthshire County Council regarding nutrient matters, indicates an integrated approach as the preferred solution to ensure no adverse effects to SAC rivers².

The overall aim of an integrated approach is to coordinate actions to deliver a long-term improving trend in nutrient levels within SAC catchments, whilst managing growth in accordance with the sustainable development principle. Appropriate steps to avoid deterioration or provide restoration (under Article 6(2) of the Habitats Regulations) in nutrient neutrality affected catchments could include the following:

- Planned upgrades to WwTWs and/or DCWW AMP8 schemes including storm overflow improvements.
- Ongoing SAC restoration measures being delivered by various bodies and organisations (e.g. NRW, NMBs, and Usk Catchment Partnership etc.) that represent a coordinated package of action supporting nutrient reduction, SAC recovery, sustainable land management, climate resilience, nature recovery, flood risk reduction and resilient communities.
- Work underway through the programme of measures under the River Basin Management Plan (RBMP).
- Forthcoming NRW CNRPs.

The integrated approach allows mitigation for nutrients by developers to be more closely integrated with the delivery of restoration under Article 6(2) where developer contributions:

- Increase the scale, magnitude, or scope of planned restoration measures (over and above what would otherwise have been delivered); **OR**
- Speed up delivery of planned restoration measures beyond what would normally be delivered, where the current implementation timescales risk meaningful ecological deterioration in the interim.

Overall, MCC recognises that the delivery of development proposed within the affected SAC catchments is interdependent with a range of nutrient reduction and restoration measures being progressed by a range of competent authorities and stakeholders. A Briefing Note on proposed restoration measures and delivery programmes for the River Usk SAC is included at Appendix A. In addition to capacity identified through NRW's Review of Permits, various other measures including actions delivered through the NMB and associated catchment plans, land management and agricultural best practice initiatives, and wider Welsh Government, NRW and partner-led programmes are being progressed with the shared purpose of reducing nutrient inputs and improving river condition. MCC has, and will continue to, work collaboratively with delivery partners including DCWW, NRW, NMBs, catchment partnerships and developers to support and enable secure integrated mitigation opportunities to effectively address nutrients in affected SAC catchments throughout the Plan period and beyond.

Whilst many of these measures are outside the direct control of the Council, they are being advanced through established regulatory and governance frameworks and are, therefore, considered sufficiently secure to be taken into account within the evolving strategic approach advocated by Welsh Government and reflected in the Plan's evidence base, including the Nutrient Mitigation Action Plan. The Council recognises that the delivery of development within SAC catchments is dependent upon the availability of the necessary wastewater treatment and capacity, and delivery of other mitigation measures, where necessary. As such, development can only proceed where it can be demonstrated that the relevant capacity and necessary mitigation measures are in place, ensuring no adverse effect on the integrity of the SACs. To account for uncertainty at this stage with the delivery of other initiatives as well as future proposed CRNPs, a policy caveat approach has been adopted (see updated RLDP Policy NR3 set out in the Deposit LDP Schedule of Proposed Changes (August 2026)).

Actions for MCC are included in the AP (Section 5) through which it is expected to be demonstrated that there are sufficient schemes underway within the affected catchment to which an integrated approach could be applied. In particular, the AP proposes to:

- Identify existing mitigation/restoration proposals within the affected catchments, whether these are proposed by DCWW, NMBs, NRW/ Catchment Nutrient Recovery Plans or measures underway under the RBMP etc.
- Highlight opportunities for integrated mitigation that developers might contribute too through an appropriate platform, most likely to be hosted on the MCC website.

4.4 Strategic Mitigation

Where it is not possible to apply a threshold or integrated approach, the Welsh Government clarification note on applying the Tests of Soundness to LDPs² indicates that a nutrient neutrality-based approach is then required. As outlined in Section 2, MCC have progressed a Strategic Mitigation Opportunities Report (SMOR) to determine whether there are any feasible strategic mitigation approaches that might be applicable in Monmouthshire. The strategic mitigation approach could include an array of mitigation options developed at scale by MCC, and which could then be offered as part of nutrient credit scheme for developers to purchase and offset their nutrient contributions to the riverine SACs.

A long list of proven strategic nutrient mitigation approaches was considered, based on precedence for delivery in England where such solutions have been considered for longer. A short-list was then developed based on constraints within the Monmouthshire setting. For example, approaches such as land-use change which have been implemented elsewhere were not considered suitable in Monmouthshire due to a shortage of MCC owned agricultural land which enable the approach to be adopted. Similarly, MCC do not have a bank of housing stock to which additional water use efficiency measures could be applied.

Overall, the short-listing approach determined that urban retrofit SuDS and constructed wetlands were possible options, and these were taken forward for further consideration of their potential. This included initial environmental and engineering constraints analysis to identify potentially suitable sites that could be taken forward for concept design by MCC. High level estimates of nutrient removal were undertaken on the preferred sites to determine how much benefit they would provide in terms of nutrient mitigation for the rLDP developments. The details of the mitigation selection, constraints analysis and nutrient reduction potential estimates are discussed in more detail within the SMOR. Wetlands have emerged from this exercise as the key strategic option with the potential to deliver the most nutrient mitigation benefit, and it is recommended that a number of sites are taken forward for further evaluation of potential and delivery (see Table 4). Retrofit SuDS would provide very limited nutrient mitigation based on available sites and are not considered a cost-effective solution, and as such are not recommended to be progressed.

Table 4 Summary of Short Listed Strategic Approaches

Feature	Constructed Wetlands		
Proposed locations	Goytre WwTW	Usk WwTW	Aberbaiden WwTW
Allocated sites that could be mitigated	HA10, HA11, HA12, HA14, HA15, HA16 [total load 70.15 kgTP/yr]	HA10, HA11, HA14 [total load 42.4 kgTP/yr]	Could support all developments in the rLDP and committed [total load 264kgTP/yr]
Minimum area required to achieve predicted excess nutrient load from the above sites	0.75 ha	0.16 ha	0.8 ha
Partners	• Policy: Welsh Government • Regulation: NRW • Operations and drainage: DCWW • Delivery: Bannau Brycheiniog National Park Authority (regarding Aberbaiden WwTW), Usk Catchment Partnership, developers, highways, maintenance bodies		
Potential delivery issues	• Land requirement is high and therefore increases cost. • Designing, constructing and maintain a constructed wetland is complex. • Adjacent water table must not reach surface, increasing the complexity of site selection. • Wetland planting requires time to mature in order to function as per expected nutrient removal rate. • Aberbaiden WwTW is located within the Bannau Brycheiniog National Park and this may impact the ability to obtain planning permission.		

- Funding mechanisms
- Project Delivery Grants, Local Governance Funding etc.
 - Secure future developer contributions via nutrient credit scheme and legal agreements (e.g. Section 106).
 - Capital grants from the Council.

Indicative costs to mitigate predicted excess nutrient load from above named sites	Goytre c. £600k	Usk c. £770k	Aberbaiden c. £970k
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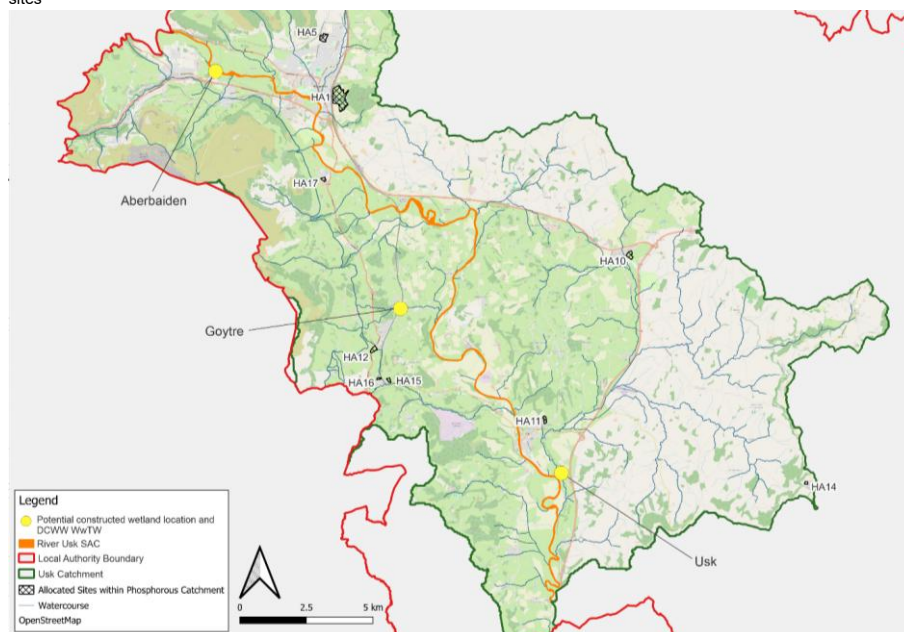


Figure 9 Location of preferred constructed wetlands (based on analysis in the SMOR)

4.5 Developer Led Mitigation

Where a threshold-based approach is not appropriate, there are no suitable integrated solution options, and if strategic scale mitigation approaches for the management of excess nutrients are not possible or have yet to come into fruition, developers can also lead on development of their own mitigation for a plan or project. Depending on the scale of mitigation, developer-led measures also have the potential to create headroom for other projects to proceed. A key action of the AP is therefore the creation of a [Developer Mitigation HandbookSPG](#) for phosphorus in Monmouthshire. This will outline the nutrient neutrality assessment approach for developers and an array of potential mitigation options, including how these should be secured for the lifetime of the development. See [Section 3.4](#) for further details.

5. Timescales, Sequencing and Monitoring

5.1 Timescales

There is no fixed date for when the rLDP will be published as this depends on the completion of the ongoing Examination process. At this stage it is estimated that the rLDP will be adopted in 2027.

The timeline of the projected cumulative increase in phosphorus loading resulting from the rLDP developments is shown in Figure 10 for the River Usk SAC and Figure 11 for the River Wye SAC. Further details are tabulated in Appendix B which also shows the number of units of housing to be brought forward on a 'year by year' basis in relation to each allocated development.

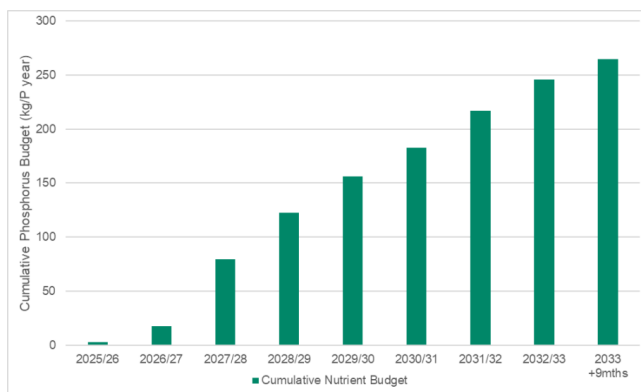


Figure 10 Usk Catchment Cumulative Nutrient Budget Scenario 1 (Worst Case Scenario)

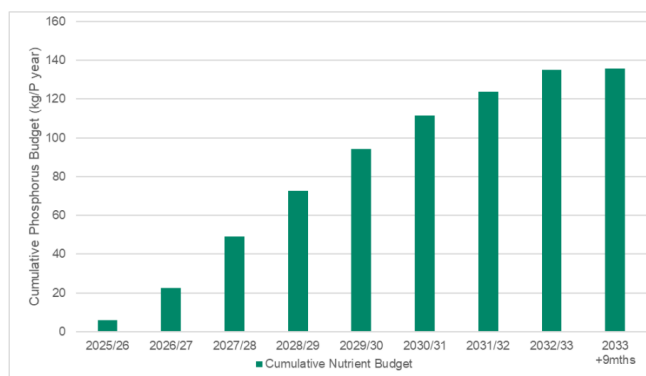


Figure 11 Wye Catchment Cumulative Nutrient Budget Scenario 1 (Worst Case Scenario)

Conditions may be tied to permissions to ensure occupation is concurrent with the delivery of mitigation, so planning conditions will be in place alongside mitigation. The majority of development within both catchments will take place from 2027 onwards.

The phasing of any necessary mitigation delivery will need to be aligned with the timing of housing units bought forward. Occupancy dates for new developments will be subject to planning permission and/or Grampian Conditions (restricting other development until the terms of a Section 106, or other specified actions, are met).

5.1 Sequencing

Timescales for the AP tasks will vary from short-term (<6 months) high priority tasks, to medium term tasks (6-12 months), and longer-term tasks (>12 months) that are dependent on preceding tasks (see also Section 6.1 Prioritisation of Actions and Figure 10).

In the short-medium term (<6 months) there will be a focus on further consultation with relevant stakeholders (notably NRW and DCWW) as to the robust application of the latest emerging guidance (e.g. the Tests of Soundness²), followed by publication of the initial Developer Mitigation Handbook, SPG. This document will provide greater clarity on application of screening criteria, a threshold-based approach, and the integrated approach. It will also provide detail on how developers may deliver mitigation themselves, while integrated and

strategic opportunities are still under development. Detail should be sufficient to support proposed rLDP developments to come forward through to 2027, with these being relatively small in quantum compared to the remainder of the rLDP period through to 2033 (see Figure 8 and 9). In the short term, feasibility and constraints analysis tasks for strategic mitigation options suitable for credit trading will also be undertaken.

Over the medium to longer term, the focus will be on developing and delivering strategic options (notably constructed wetlands), which will involve a number of tasks from stakeholder consultation, through to developing outline and detailed designs, obtaining planning permission and relevant consents, and determining appropriate management and maintenance approaches for securing delivery of nutrient mitigation in the long term.

With regards to the integrated approach, MCC will work with relevant partners delivering improvement and restoration schemes (e.g. DCWW, NRW, NMBs etc) in order to develop a mechanism through which developers can contribute positively. This will also include development of a platform whereby developers have visibility of available schemes and guidance on how to contribute. Further detail with regard to timescales are provided in the AP in Section 6.

5.2 Monitoring

The Welsh Government clarification note on how “Tests of Soundness” requires that mitigation action plans include a clear monitoring framework for implementing policies and proposals relative to the adaptive management framework of nutrient issues. Therefore, monitoring proposals have been set out in Table 5 under each mitigation pathways and action, where relevant to do so.

The nature of the monitoring depends on the type of action, and at this stage there remains some uncertainty regarding the scope of site-specific monitoring or monitoring that may be required to be undertaken by third parties. The framework for monitoring will be kept under review as part of regular reviews of this AP with more detailed proposals to be brought forward at the required stages in the future if and when mitigation pathways are sufficiently progressed.

6. Action Plan

The list of Action Plan measures and outcomes are discussed below within Table 5. This includes identification of stakeholders, timescales to implementation, dependencies, funding considerations and monitoring requirements. Further detail regarding the timeline for strategic wetlands to be developed is provided in Appendix C.

Table 5 Action Plan Measures

Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
Pathway 1: Screening against WwTW Headroom					
1. MCC to continue to consult with DCWW to confirm any ongoing or future upgrades to each WwTW relevant to the rLDP. Where tightened permit limits precede occupation of proposed developments further mitigation may not be required. Outcome: To identify the degree of alignment between rLDP phasing and WwTW upgrades and therefore how many homes need mitigating prior to new permit limits being applied. A provisional analysis of this is shown in Section 3.1.	- NRW - DCWW	- Consultation of DCWW upgrades timeframes for WwTW – short term (1-2 months). - Consultation with NRW to agree outcomes - short term (2-3 months). - WwTW upgrades – ongoing – short to long term (0-4 years), with some WwTW having already been upgraded and all those requiring upgrade to be complete by 2030.	Dependencies - DCWW implementation of WwTW upgrades within suggested timescales to meet reduced permit limits for phosphorus. - Agreement from NRW on allocated sites where no significant adverse effects would occur. Risk Management - If consultation determines that there is limited potential to screen out developments, or should timings mean that significant nutrient reductions are still required in the short term or proposed WwTW upgrades are delayed, then it is considered that there are sufficient alternative approaches within the AP to mitigate this risk and enable rLDP development to proceed as per the proposed timescales. - The Developer Mitigation Handbook SPG will be a 'live' document that will be reviewed and updated to reflect changes in nutrient mitigation requirements as and when required.	- Upgrades funded by DCWW. - MCC to condition timing of development to correspond with delivery of future improvements at WwTW. Grampian conditions may be used but, as development specific mitigation, should be considered on a case-by-case basis as part of an Appropriate Assessment.	DCWW permit compliance monitoring. Regulated by NRW.
2. MCC to consult NRW to seek agreement over which rLDP allocations (or subset of the allocation depending on phasing) MCC consider appropriate to conclude no likely significant effects on SAC site integrity on the basis of planned permit limit tightening. Outcome: Agreement to screen out a certain quantum of development from requiring mitigation. This outcome would be outlined on the MCC webpages and within the forthcoming Developer Mitigation Handbook Phosphorus Strategy and Mitigation SPG (hereafter referred to as SPG).					

Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
Pathway 2: Threshold Approach / De Minimis					
3. MCC to investigate suitability of a threshold-based approach across the rLDP period as a whole (for those developments remaining following previous steps relating to WwTV permit tightening). This approach has been advocated by Welsh Government, however, such an approach has yet to be adopted successfully in Wales and requires consultation with NRW to confirm feasibility for Monmouthshire and how aspects such as monitoring would be accounted for. Outcome: Determine whether threshold approach can be used in Monmouthshire.	- MCC - NRW - DCWW	- Consultation with NRW to agree feasibility of a threshold-based approach - short term (2-6 months) - MCC to prepare Developer Mitigation HandbookSPG which is to include outline of how a threshold-based approach will be applied to the rLDP Plan as a whole, if agreed with NRW – short term (2-6 within 6 months of adoption of the RLDP).	Dependencies - Definition of a threshold will be based on NRW source apportionment data, and consideration of the rLDP nutrient budget within that context. - MCC must demonstrate to NRW's satisfaction that a defined level of growth will not undermine the achievement of the conservation objectives or otherwise delay the achievement of such objectives. - There must be no credible evidence to support a view that the delivery of development provided for within the rLDP will meaningfully undermine or hinder the ability of relevant authorities to adapt or modify current initiatives as part of their duty to take appropriate steps to avoid deterioration which are necessary to achieve the conservation objectives. Risk Management - There is considered a risk of challenge given that a threshold-based approach has no precedent for nutrient neutrality that MCC are aware of, at the time of writing. Nonetheless, Welsh Government are advocating the approach through their guidance and so it should be explored through the AP. This risk is to be mitigated through close consultation with NRW in regard to their expectations and correct definition of a defensible <i>de minimis</i> threshold. - Should a robust <i>de minimis</i> threshold not be obtainable and agreed with NRW for these riverine SACs then it is considered that there are sufficient alternative approaches within the AP to mitigate this	None required once threshold agreed for the rLDP Plan as a whole. The requirement for implementation of further mitigation would be screened out through the <i>de minimis</i> threshold.	NRW to monitor the SAC condition status. Should there be a decline then the <i>de minimis</i> threshold may require re-evaluation.
4. Assuming the threshold approach is confirmed to be appropriate, MCC to determine what the <i>de minimis</i> threshold would be across the rLDP period and agree this with NRW. Outcome: Publication of a <i>de minimis</i> threshold.					
5. MCC to prepare a Developer Mitigation HandbookSPG within 6 months of adoption of the RLDP, prior to rLDP finalisation. This will outline how the threshold-based approach will be applied to the rLDP if confirmed to be appropriate by NRW. Outcome: Provide advice to developers where and how the threshold-based approach can be used.					

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Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
			risk and enable rLDP development to proceed as per the proposed timescales. The Developer Mitigation HandbookSPG will be a 'live' document that will be <u>reviewed and</u> updated to reflect changes in nutrient mitigation requirements as and when required.		
Pathway 3: Integrated Approach					
6. MCC to identify proposed enhancement/ improvement schemes proposed or already implemented in Monmouthshire, which may be suitable for support through developer contributions (through expediting or expanding the scale of the scheme). At this stage a number of schemes have been identified at a high level by DCWW through AMP8, including storm overflow improvements. Numerous restoration and enhancement schemes are also proposed within the Usk Catchment Partnership NMP and forthcoming Wye NMP and are expected through future Catchment Nutrient Management Plans (CNMPs), all of which may have potential to benefit from an integrated approach. 7. MCC to investigate approaches that will allow developers to gain visibility of integrated approaches so they can consider positive contributions. This is expected to be via a council webpage. 8. MCC to investigate how positive developer contributions could be reconciled with the quantum of nutrient contributions from their development and secured in perpetuity. 9. MCC to agree approach with NRW. Outcome (6-9): Production of relevant guidance within the forthcoming	- MCC - NRW - DCWW - NMBs - Wildlife/ Rivers Trusts - Wye and Usk Foundation - Housing developers - Farming Unions - Others as yet not identified	- Potential schemes: AMP8 improvements to WwTW with a final date of 2032 but most sites will be upgraded by 2030 – medium to very long term (0-6 years). - Timelines for current enhancement / restoration activities are set out in CNMPs/NMPs, with timelines being variable due to differing nature of the schemes – medium to very long term (1-10 years). - MCC to prepare Developer Mitigation HandbookSPG which is to include an outline of how the integrated can be applied – short-term (2 <u>within</u> 6 months <u>of adoption of the RLDP</u>). Next steps for practical delivery will be outlined therein. - MCC to update Developer Mitigation HandbookSPG once further clarity on the integrated approach has developed and further potential schemes comes forward – medium to long term (6 <u>12</u> months to several years).	Dependencies - The approach relies on appropriate schemes to which developers can positively contribute, primarily DCWW, NMB and NRW schemes. - Align with the test of soundness published by Welsh Government. Notably, delivery of growth contained within the plan will be inherently linked to progress being made on the steps to be taken and measures identified to improve the SAC. Risk Management - An interdependency between the contribution of developers with these steps and measures will need to be demonstrated. The rLDP can account for this by establishing a policy caveat approach towards implementation, which renders the granting of planning permission conditional upon the delivery milestones identified for on-going and future improvement measures. - As with the threshold approach, there is not yet precedent for this approach having been implemented in Wales at the time of writing, and this does raise some risk. Nonetheless, Welsh Government are also advocating the approach through their guidance and so it should be explored through the AP. This risk is to be mitigated through close	- Welsh Government grants to be used to develop further improvement / restoration measures where possible. - Developer payments will be used to increase scale of planned restoration or speed of delivery on a 'case by case' basis. - DCWW, NRW (or others with suitable schemes) will have funded their own projects. Developer contributions would be used to enable faster implementation of these or and expansion in scale of the measures.	- SAC condition assessments will indicate whether there is an improving baseline condition as forecast. - Comparison with improvement targets and trajectories as to be set out in future CNMPs. - Additional water quality monitoring targeted at specific mitigation / restoration approach (case by case basis). These would be anticipated to be undertaken by the organisation delivering the overall scheme (e.g. DCWW, NRW etc).

Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
<u>Developer Mitigation Handbook SPG</u>. This will include further description of available schemes and directions to developers to follow for positively contributing to their delivery and hence securing mitigation in perpetuity. 10. MCC to periodically <u>review and update Developer Mitigation Handbook SPG</u> with any further developments with regard to the integrated approach and schemes coming forward. Outcome: Guidance that maintains relevance across the rLDP period.			consultation with NRW in regard to their expectations for delivery and required evidence base. The <u>Developer Mitigation Handbook SPG</u> will be a 'live' document that will be <u>reviewed and</u> updated to reflect changes in nutrient mitigation requirements as and when required.		
Pathway 4: Strategic Mitigation - Constructed Wetland					
11. MCC have completed a Strategic Mitigation Options Report which includes identification and feasibility appraisal of potential options for development of constructed wetlands close to DCWW WwTW's in the Usk catchment. Outcome: A preferred location has been identified at Goytre WwTW. Additional options may also be viable at Usk WwTW and Aberbaiden WwTW, although these sites would likely rely on pumping which will increase costs. 12. MCC to continue ongoing consultation with DCWW regarding development of the preferred wetland site(s), and if agreement can be reached MCC will undertake concept design to ensure sufficient P reduction to offset a significant proportion of development proposed in the rLDP. Outcome: Confirmation of feasibility stage and progression to scheme development. 13. MCC to consider implementation and future operating costs and determine feasibility of nutrient credit scheme.	- MCC - Bannau Brycheiniog National Park Authority (with regards Aberbaiden WwTW) - NRW - DCWW - Usk Catchment Partnership - Private Landowners	- Pre-Planning (short term – 1-6 months from day 1). - Planning and Design (medium term - c. 1-18 months from day 1) - Identify and secure land. - Baseline monitoring to inform design / quantify nutrient reduction. - Planning / impact assessment. - Regulatory Approval (long term - c. 18-24 months from day 1) - Submit planning application. - Obtain NRW permits. - Construction (long-term - c. 24-30 months from day 1) - Physical basin creation. - Planting of macrophytes. - Flow control structures. - Commissioning / Maturation (long term – 30+ months from day 1) - Establish vegetation in order for effective basin functioning. - Monitoring of performance. - Strategic credit system launch.	Dependencies - DCWW agreement to use WwTW discharge. - Land availability. - Feasibility Assessment and Concept Design. - Constraint analysis and surveys (e.g. heritage, ecology, contaminated land, utilities, water resource zones etc). - Detailed design indicating sufficient removal potential. - Planning permission. Aberbaiden WwTW is located within the Bannau Brycheiniog National Park. - Permits applications. Risk Management - Seek early agreement with DCWW on permitting aspects, as constructed wetlands raise questions over the point of compliance for existing DCWW permits. Involve NRW in permitting discussions at an early stage through pre-application consultation.	- Project Delivery Grants, Local Governance Funding etc. - Secure future developer contributions via nutrient credit scheme and legal agreements (e.g. Section 106). - Capital grants from the Council.	- Monitoring requirements and responsibilities to be outlined in a Wetland Monitoring and Maintenance Plan. This will include: - Visual inspection by relevant experts and officers to ensure wetland maturing and implemented as per design and planting strategy. - Silt levels / desilting and other ongoing management requirements.

Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
Outcome: Determination of suitable mechanism for charging developers for nutrient credits and ensuring the option is sufficiently attractive for full implementation. 14. MCC to consult with NRW and DCWW regarding permit requirements. 15. MCC to seek agreement with DCWW over points of compliance for the existing permit and which party has 'ownership' of the water passing through, and discharged from, the wetland. Outcome Actions 13 and 14: would be an agreed position documented through a Memorandum of Understanding between MCC and DCWW, or similar document. 16. MCC to undertake detailed design. 17. MCC/DCWW to apply for required Environmental Permits / planning permission. 18. MCC to construct and commission wetland. 19. MCC to prepare and implement Wetland Monitoring and Maintenance Plan (expected to be a condition of planning). Outcome Actions 16 to 19: Design, build and operation of Constructed Wetland with nutrient credit system for prospective developers upstream of the wetland location on the SAC.		Ongoing asset inspection / reporting). Further details regarding the constructed wetland timeline are given in Appendix C.	- Determine any likely upgrades to phosphorus treatment at an early stage through DCWW consultation as this may impact future nutrient reduction potential. - If poorly maintained there are risks around poor performance, and so an appropriate Wetland Monitoring and Maintenance Plan will be developed. - Landowners to be engaged at an early stage to avoid abortive works. - Ecology appraisal to be undertaken at an early stage to identify any prohibitive habitats or species for wetland development. - Wetland design to be precautionary when calculating the rate of nutrient removal and when sizing the wetland. It will be important to demonstrate how the inflow source is linked to the wetland, to calculate nutrient load entering and leaving wetland, to be conservative with assumptions on performance, and to develop an adaptive Monitoring and Maintenance Plan. Areas of uncertainty may influence how wetlands are treated within HRA, reinforcing the need for robust monitoring and review.		
Pathway 5: Developer Led Mitigation					
20. MCC are preparing guidance for developer led mitigation, along with worked examples, for inclusion in a <u>Developer Mitigation Handbook SPG</u> .	- Developers - MCC - NRW - Landowners	Prepare <u>Developer Mitigation Handbook prior to rLDP finalisation SPG within 6 months of adoption of the RLDLP (short term – 2-6 months –)</u>.	Dependencies NRW agreement regarding the use of threshold and integrated approaches will be required prior to inclusion in the	- Developer funded. - Implemented through rLDP policy requirements for nutrient mitigation/betterment.	Mitigation to be maintained and monitored in perpetuity / for the lifetime of a

Actions/Outcome	Stakeholders	Timescales	Dependencies and Risk Management	Implementation / Funding	Monitoring
Outcome: Publication of a Developer Mitigation Handbook SPG .	DCWW	Handbook will need to be updated periodically to reflect latest nutrient mitigation requirements (ongoing).	Handbook (see above dependencies for these cases). - MCC Strategic Mitigation Options Report. Risk Management - Guidance and advice will change over time. Therefore, the Developer Mitigation Handbook SPG will need to be periodically reviewed and updated to remain current good practice. Developers will be advised to seek pre-planning advice from MCC.	- Developer led mitigation likely to be secured using Section 106 agreements. - Grampian condition can be used to ensure mitigation is operational prior to occupation.	development as required. The Developer Mitigation Handbook SPG will outline at a high level the monitoring requirements of different types of approach.

6.1 Prioritisation of Actions

The high-level list of actions and their priority is displayed in Figure 11. The priority of each action is indicated with a Red, Amber, Green (RAG) colour coding as follows:

- Red indicates a high priority action.
- Amber indicates a medium priority action.
- Green indicates a lower priority action.

There are five key pathways to the AP through which it is possible to screen out or mitigate phosphorus loadings relating to the rLDP. Given the array of pathways and that threshold and integrated approaches are being actively encouraged by Welsh Government as a preference to, but potentially alongside strategic and develop-led mitigation, MCC has set out an AP that provides a suitably robust roadmap for ensuring that appropriate mitigation can be delivered to mitigate any increase in phosphorus loading to the Usk SAC or Wye SAC as a result of the implementation of the rLDP. This will ensure that any adverse significant effects on the site integrity of the riverine SACs can be prevented.

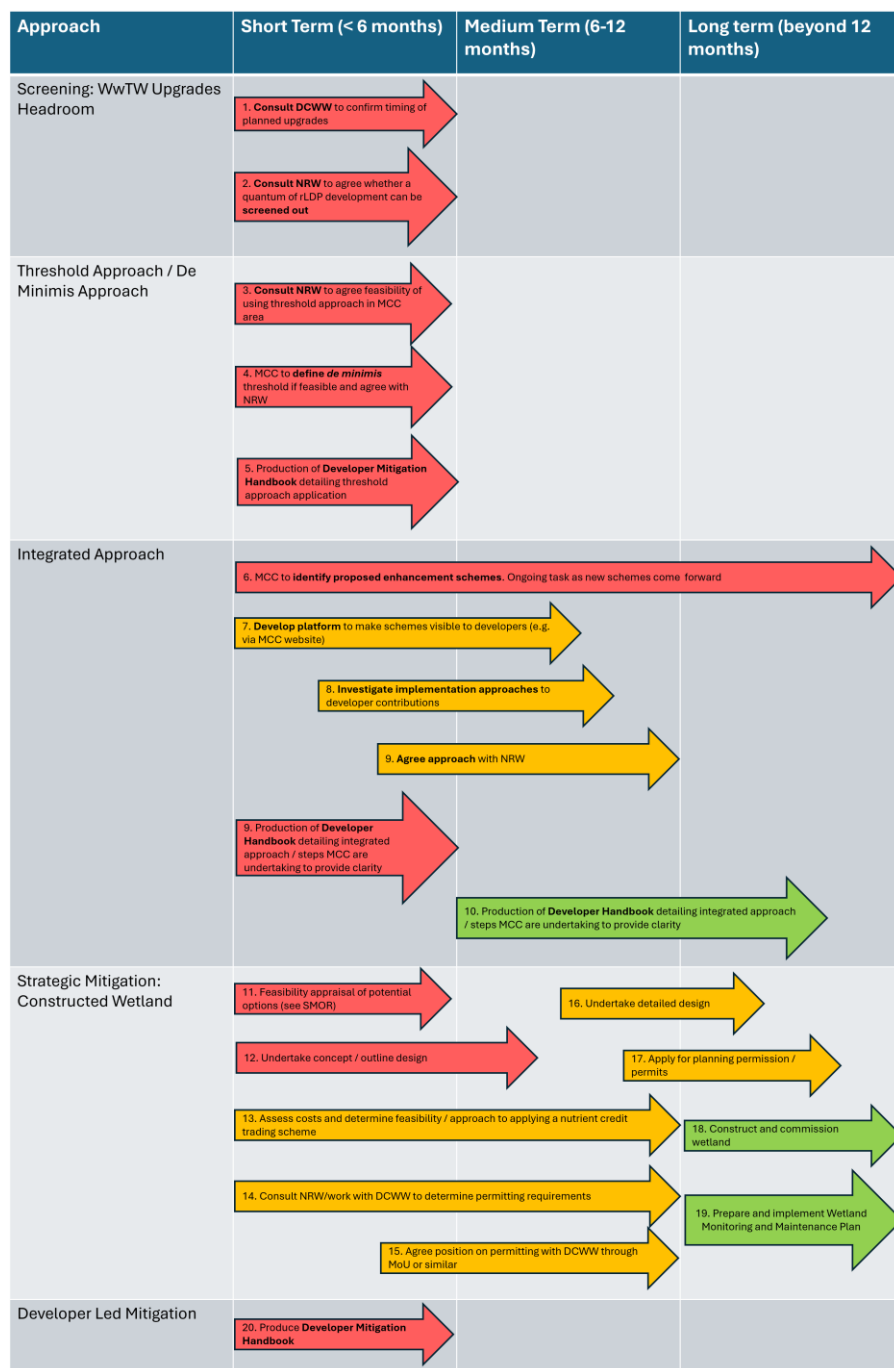


Figure 12 Timescale of proposed actions and RAG prioritisation

Appendix A River Usk restoration measures and delivery programmes

Briefing Note

River Usk SAC: Restoration Measures, Delivery Programmes and Implications for Welsh Government and RLDP Phasing

Purpose

This report sets out the restoration measures relevant to the River Usk Special Area of Conservation (SAC), including delivery mechanisms, timescales, monitoring arrangements and their relationship to environmental improvement and RLDP phasing.

It draws together existing, funded and emerging programmes being delivered or developed by Monmouthshire County Council and partners. These are presented as a coordinated package of action supporting nutrient reduction, SAC recovery, sustainable land management, climate resilience, nature recovery, flood risk reduction and resilient communities.

1. Strategic Catchment Context

The principal strategic framework for catchment restoration is provided by the Usk Catchment Partnership, a Welsh Government-supported initiative hosted by Bannau Brycheiniog National Park Authority. The Partnership brings together statutory bodies, local authorities, environmental organisations, farming interests and community representatives around a shared aim to restore the ecological health and resilience of the River Usk and its catchment. Its membership includes Monmouthshire County Council, Powys County Council, Natural Resources Wales, Dŵr Cymru Welsh Water, Wye and Usk Foundation, Gwent Wildlife Trust, Save the River Usk and Beacons Water Group (Usk Catchment Partnership, n.d.).

The Partnership has published the *River Usk Nutrient Management Plan*, dated April 2025. This provides the catchment-level framework for addressing nutrient pressures, water quality, flood risk, sustainable farming, nature recovery and resilient communities. It identifies a range of pressures on the river, including agriculture, Dŵr Cymru Welsh Water assets, private sewage systems, biosolids, housing need, climate change and modified watercourses (Usk Catchment Partnership, 2025).

The Partnership provides the governance and evidence framework through which individual projects can be coordinated into a wider catchment restoration programme. Its Knowledge Hub supports this by identifying pressures and barriers, quantifying the impact of actions, and developing metrics to monitor progress.

2. Intended Outcomes for the Usk Catchment

The Usk Catchment Partnership's published vision is long-term. By 2043, it seeks a river with thriving wildlife, sheltered by trees, bordered by a diverse mosaic of habitats, and supported by regenerative practices that produce food, manage water flows, store and manage carbon, and support a sustainable local economy.

The Usk Catchment Partnership has identified the following long-term outcomes for the river and wider catchment:

- improved water quality through the reduction of phosphorus and other pollutants affecting river health;
- improved management of water quantity, including climate change impacts and abstraction pressures;
- improved ecological integrity, including biodiversity, habitat quality and the removal of invasive non-native species;
- climate adaptation and mitigation;
- development that is water and nutrient neutral or net positive;
- the long-term objective that the features for which the Usk is designated as a SAC are in favourable condition and that nutrient levels are within safe limits.

3. Restoration Programmes and Delivery Mechanisms

3.1 Ffermio Bro – Landscape-Scale Farming in Designated Landscapes

Ffermio Bro was launched by Welsh Government on 1 April 2025 as a collaborative farming programme operating across Wales' Designated Landscapes, including National Parks and National Landscapes. The programme supports farmers and land managers to deliver projects that improve nature and the environment, with local priorities set by the relevant Designated Landscape bodies (Welsh Government, 2026; Landscapes Wales, n.d.; Monmouthshire County Council, n.d.).

Welsh Government has confirmed a further £6.5 million investment for the period 2026–2028, with £5.5 million going directly to farmers to carry out on-farm projects. The funding will also enable Designated Landscape bodies to recruit additional staff, carry out ecological surveys, and provide training and advisory support (Welsh Government, 2026).

The Bannau Brycheiniog National Park Authority states that Ffermio Bro launched on 1 April 2025 and will run until March 2028. It also confirms that Year 2 of the scheme began on 1 April 2026 (Bannau Brycheiniog National Park Authority, n.d.).

Within Bannau Brycheiniog National Park, improving water quality within the River Usk catchment is identified as a priority theme, with support for natural flood management, wetland creation, riparian habitat restoration, livestock exclusion, woodland and hedgerow creation, and soil management measures (Monmouthshire County Council, n.d.).

Ffermio Bro provides an ongoing mechanism for collaborative catchment management across multiple holdings, enabling landscape-scale improvements in water quality, habitat condition, nutrient retention, soil health and ecological connectivity. It also informs the future collaborative layer of the Sustainable Farming Scheme.

Relevant timescale: April 2025 to March 2028.

Relevant funding: £6.5 million confirmed by Welsh Government for 2026–2028, including £5.5 million direct support to farmers.

What this will achieve: improved sustainable land management, nature recovery, climate adaptation, collaborative farming, nutrient reduction and practical development of the future Sustainable Farming Scheme collaborative layer.

3.2 Landscape Connections – A Healthy Usk Catchment

The Landscape Connections proposal, *Dalgylch iach yr Wysg / Landscape Connections – A Healthy Usk Catchment*, is being developed by Bannau Brycheiniog National Park Authority and the Usk Catchment Partnership. The proposal describes a catchment-wide, landscape-scale partnership

programme to support ecological, economic, social and cultural advancement in the Usk catchment (Bannau Brycheiniog National Park Authority and Usk Catchment Partnership, n.d.).

The proposal includes actions to restore wetlands, ponds, floodplains, soil health, peatlands and woodlands; increase terrestrial and aquatic biodiversity; tackle invasive species; improve species-rich grasslands and floodplain meadows; and support climate change mitigation and adaptation through tree planting, coppice, woodland management and biomass production.

Landscape Connections would provide a long-term delivery mechanism for catchment-scale restoration, combining physical interventions with capacity building, monitoring, community participation, natural capital assessment, policy integration and partnership development.

Relevant costs and funding: total project cost estimated at £12.5 million; development phase approximately £800,000; delivery phase approximately £11.7 million; proposed Heritage Fund request £10 million; anticipated 20% contribution through BBNPA and partner cash and non-cash contributions (Bannau Brycheiniog National Park Authority and Usk Catchment Partnership, n.d.).

Relevant timescale: proposed development phase July 2027 to March 2029; proposed delivery phase October 2029 to March 2037; development phase application proposed by 11th November 2026 (updated by Landscape Connections workshop 15th June 2026).

What this will achieve: long-term SAC recovery, catchment restoration, nature-based solutions, natural capital development, community participation, sustainable land management, biodiversity recovery and climate resilience.

3.3 Nature Networks 5 – Gwent Green Grid Resilient Connections

The proposed Nature Networks 5 project, *#NNF5 Gwent Green Grid Resilient Connections*, would deliver the next stage of the Gwent Green Grid's work to implement Resilient Ecological Networks across South East Wales. The proposal identifies work across five Gwent landscape areas: Eastern Valleys, Newport, Central Monmouthshire, Bannau Brycheiniog and the Black Mountains, and Wye Valley and Wentwood (Gwent Green Grid Partnership, n.d.).

The project focuses on freshwater ecosystems and the habitats that connect them, including ponds, watercourses, marshes, bogs, fens, wet woodlands, marshy grassland, enclosed farmland, woodland, urban habitats, semi-natural grassland, and mountain, moorland and heath.

Proposed capital actions include invasive non-native species management, natural flood management, riparian planting, river cleans, installation of leaky dams, pond restoration, scrape creation, reedbed restoration, wet woodland management, tree planting, hedgerow management, grassland restoration and urban blue-green infrastructure improvements.

Nature Networks 5 addresses a key condition for river recovery: improving the condition, extent and connectivity of habitats across the wider ecological network. While not solely a nutrient mitigation programme, it supports freshwater ecosystem resilience linked to the Usk and Wye SACs.

The proposal also supports Welsh Government's 30 by 30 commitment by using Resilient Ecological Networks to help identify Core and Nature Recovery Areas and deliver action beyond protected site boundaries. It also proposes work with NRW using the Monitoring Ecosystem Performance and Condition Assessment indicator to develop a monitoring pilot for Resilient Ecological Networks (Gwent Green Grid Partnership, n.d.).

Relevant timescale: proposed project delivery from 1 April 2026 to 31 March 2029.

Delivery detail: Year 1 focuses on planning, engagement, communications, green skills and monitoring development; capital delivery begins in Year 2 from April 2027 and continues through Year 3 to March 2029.

What this will achieve: progress towards 30 by 30, stronger resilient ecological networks, improved protected site resilience, freshwater habitat recovery, better monitoring capacity, green skills, community participation and climate adaptation.

3.4 Four Rivers for LIFE – Natural Resources Wales

The Four Rivers for LIFE project is a large-scale river restoration initiative led by Natural Resources Wales to improve the ecological condition of four Special Areas of Conservation (SACs): the Teifi, Cleddau, Tywi and Usk rivers. The project aims to restore 776 km of river habitat through nature-based solutions that address key pressures including poor water quality, habitat degradation, barriers to fish migration, invasive non-native species and the impacts of climate change (Natural Resources Wales, n.d.).

For the River Usk catchment, the project is particularly relevant because it supports the recovery of internationally important species such as Atlantic salmon, lamprey, shad, otter and freshwater pearl mussel. Planned actions include improving fish passage at migration barriers, reconnecting rivers with their floodplains, restoring natural river processes, planting native riverside trees, reducing invasive species and working with farmers to minimise sediment and nutrient pollution (Natural Resources Wales, n.d.).

These measures will enhance biodiversity, improve water quality, increase climate resilience and reduce flood risk across the Usk catchment. By engaging landowners, local communities and partner organisations, the project seeks to deliver long-term, sustainable restoration benefits while supporting the ecological integrity and resilience of the River Usk SAC.

Relevant timescales: The project began in 2022 with surveys, baseline monitoring, restoration planning and identification of priority sites for habitat improvement, fish passage, invasive species control and freshwater pearl mussel conservation. It then moved into delivery, including river habitat restoration, riparian tree planting, fencing, community engagement, invasive species management, fish passage improvements, floodplain reconnection, wetland creation and work with farmers to reduce pollution. The final phase focuses, up to March 2027, on completing restoration works, monitoring ecological benefits, continuing habitat management and establishing long-term stewardship with communities, landowners and partner organisations to secure lasting improvements across the River Usk and other SAC catchments (Natural Resources Wales, 2022).

What this will achieve: The Four Rivers for LIFE project will restore 776 km of river habitat, improve water quality, reconnect floodplains, remove fish migration barriers, control invasive species and enhance biodiversity across four catchments, including the River Usk catchment (Natural Resources Wales, n.d.).

3.5 Central Monmouthshire Opportunity Catchment – Natural Resources Wales

The Central Monmouthshire Opportunity Catchment (CMOC) Project supports restoration of the River Usk catchment by working with farmers and landowners to implement nature-based solutions that improve water quality, reduce soil erosion and strengthen ecosystem resilience. Measures include planting hedgerows and native trees, creating riparian buffer zones, installing livestock-

exclusion fencing and introducing natural flood management features such as leaky barriers (Natural Resources Wales, 2024; Natural Resources Wales, n.d.).

These interventions reduce sediment and nutrient runoff, protect fish spawning habitats, improve conditions for wildlife including otters, bats and dormice, and help mitigate climate change through carbon storage. By slowing water flows, improving soil health and enhancing habitat connectivity, the project delivers long-term benefits for both sustainable farming and the ecological recovery of tributaries that feed the River Usk (Natural Resources Wales, 2024).

The project, which is a delivery mechanism for the Water Framework Directive objectives, has a newly appointed project officer who is currently developing the next stages of delivery.

Relevant timescales: Whilst the project relates to the third cycle of River Basin Management Plans (2021–2027), it has been confirmed that it will continue as a priority for NRW to 2030 (pers. comm., People and Places Team, 6 July 2026).

What will this achieve: Long term benefits for sustainable farming, water quality and flow.

3.6 River Gavenny Project

The River Gavenny Project, hosted by Monmouthshire County Council through its Green Infrastructure Team, is a catchment-scale partnership initiative that acts as a local delivery mechanism for restoring the ecological health of the River Gavenny, a key tributary of the River Usk. The project was relaunched in 2024 to bring together Town and Community Councils, Natural Resources Wales, environmental organisations, landowners and residents around a shared programme of river restoration and stewardship (Monmouthshire County Council, n.d.).

The project supports River Usk restoration by tackling pressures at source within the Gavenny catchment. Its stakeholder led objectives include improving biodiversity, enhancing habitat connectivity, addressing pollution and litter, controlling invasive species, increasing climate resilience and promoting community engagement with the river environment.

Early delivery has included collaborative river clean-up events involving Monmouthshire County Council, Keep Wales Tidy, Groundwork Wales, local councils and volunteers. The partnership is working to control invasive Himalayan balsam and exploring other practical measures to improve river condition and habitat quality.

By improving the condition of the River Gavenny before it enters the Usk at Abergavenny, the project contributes to wider River Usk catchment objectives, helping deliver Water Framework Directive outcomes, nature recovery, ecosystem resilience and community wellbeing through integrated catchment management.

Relevant timescales: The project is funded through the Local Places for Nature project in 2025/26, with funding from the Gwent Green Grid Nature Networks project providing capital funding up to March 2029 (Monmouthshire County Council, n.d.; Gwent Green Grid Partnership, n.d.).

What will this achieve: Community engagement and understanding of the River Gavenny alongside practical delivery.

4. Collective Outcomes of the Programme Package

The programmes address different but connected aspects of River Usk SAC recovery and should be presented as a single, layered restoration pathway.

Together, these programmes will achieve:

- nutrient reduction and water quality improvement;
- restoration of natural hydrological processes;
- improved habitat condition and ecological connectivity;
- climate adaptation and nature-based flood risk management;
- resilient ecological networks and 30 by 30 outcomes;
- sustainable land management and regenerative farming;
- community participation, citizen science and green skills;
- long-term governance and monitoring through catchment-scale partnership working.

Together, these programmes provide immediate delivery, medium-term ecological network implementation and longer-term catchment recovery. This reduces reliance on a single project or funding source and provides a phased programme of intervention across the RLDP period and beyond.

5. Delivery Pipeline: 2025–2037

The delivery pipeline demonstrates that restoration activity begins before significant RLDP growth is delivered, continues through the early and middle parts of the plan period, and extends beyond it.

Period	Delivery mechanism	Role in restoration pathway	What this will achieve
2022–2027	Four Rivers for LIFE	Improving fish passage, enhancing habitats, reconnecting floodplains, improving water quality, controlling invasive species and promoting sustainable land management to achieve long-term ecological recovery.	Restores river habitat, improves water quality, reconnects floodplains, removes fish migration barriers, controls invasive species and enhances biodiversity.
2021–2030	Central Monmouthshire Opportunity Catchment	Working with farmers and landowners to implement nature-based solutions.	Reduces sediment and nutrient runoff, restores habitat, stores carbon and slows flows.
2024–2029	River Gavenny Project	Working with communities to deliver practical action including invasive	Reconnects communities to their local watercourse alongside practical projects to reconnect

		species control and litter management.	the floodplain and improve water quality.
2025–2028	Ffermio Bro	Collaborative land management, farm-based nature recovery, water quality improvements and habitat restoration in Designated Landscapes.	Supports sustainable land management, nutrient reduction, nature recovery, climate adaptation and the emerging Sustainable Farming Scheme collaborative layer.
2025 onwards	Usk Catchment Partnership and Nutrient Management Plan	Catchment-wide governance, evidence gathering, monitoring and prioritisation.	Supports coordinated SAC recovery, nutrient management, water quality improvement and development that is water and nutrient neutral or net positive.
2026–2029	Nature Networks 5 Gwent Green Grid Project	Implementation of Resilient Ecological Networks, freshwater habitat restoration, monitoring pilots and green skills.	Supports 30 by 30, resilient ecological networks, protected site connectivity, freshwater habitat recovery and community participation.
2027–2037	Landscape Connections – Healthy Usk Catchment	Long-term catchment-scale restoration, partnership delivery, natural capital outcomes and community engagement.	Supports long-term SAC recovery, climate resilience, sustainable land management, nature recovery and catchment-wide governance.

6. Monitoring and Adaptive Management

Monitoring is embedded across the programme package. The Usk Catchment Partnership Knowledge Hub has a specific role in identifying pressures and barriers, quantifying the impact of actions and developing metrics to monitor progress.

The Natural Flood Management project includes flow monitoring, infiltration tests, Visual Evaluation of Soil Structure scores, groundwater monitoring and hydrological modelling.

Nature Networks 5 proposes a monitoring pilot for Resilient Ecological Networks using the Monitoring Ecosystem Performance and Condition Assessment indicator, alongside citizen science activity and an update to the Gwent Resilient Ecological Network Mapper (Gwent Green Grid Partnership, n.d.; Gwent Green Grid Partnership, 2026).

Landscape Connections proposes coordinated monitoring at scale and monitoring of measurable indicators and natural capital outcomes for water, nature, climate, people and place.

This enables delivery to be reviewed and adapted over time, providing a clear basis for tracking implementation, environmental outcomes and any need for further intervention.

7. Replicable Projects on neighbouring catchments

7.1 Welsh Government FCERM Natural Flood Management – River Monnow Working with Water

Monmouthshire County Council has submitted a Welsh Government Flood and Coastal Erosion Risk Management Natural Flood Management grant application for the River Monnow – Working with Water project. The project cost is identified as £293,746, including £150,000 for NFM interventions and £44,000 as a contribution to the Resilient Rivers Monnow project (Monmouthshire County Council, 2025a).

The proposed works include buffer strips, hedges, shelterbelts, bunds, in-field storage, infiltration-enhancing seed mixes and flow-pathway disruption. These works are intended to improve infiltration, reduce runoff and slow catchment response during storm events.

The application identifies wider environmental benefits including improved soil health, improved infiltration, reduced soil and nutrient loss, enhanced biodiversity, improved ecological connectivity and improved water quality.

Although funded primarily for flood risk management, the programme also supports nutrient management and river restoration by slowing surface water, increasing infiltration and reducing sediment and nutrient movement into watercourses.

Relevant timescale: estimated start date 1 April 2026; estimated end date 12 March 2027.

Relevant funding: total project cost £293,746.

What this will achieve: reduced flood risk, slower runoff, improved soil function, reduced nutrient movement, improved water quality and stronger community resilience.

7.2 Resilient Rivers Monnow

The River Monnow NFM application includes a £44,000 contribution towards Resilient Rivers Monnow. The application states that this contribution will help unlock further funding from NRW and Network Rail and support the establishment of a catchment market capable of longer-term NFM funding across the Monnow (Monmouthshire County Council, 2025a).

The value of Resilient Rivers Monnow lies in its potential to move beyond short-term grant-funded interventions towards a more durable catchment finance model. The application identifies that the programme will help establish a pipeline of NFM and nature-based solutions that can be delivered in future funding rounds and through longer-term catchment investment.

This is relevant because river recovery in the Usk catchment will require sustained investment beyond individual grant-funded projects. A catchment finance approach could support ongoing land management changes that reduce runoff, improve resilience and strengthen rural economies.

Relevant timescale: feasibility and evidence work during 2026–27.

Relevant funding: £44,000 contribution from the FCERM NFM project towards Resilient Rivers Monnow.

What this will achieve: a stronger pipeline of nature-based solutions, longer-term catchment

investment, natural flood management opportunities, sustainable land management and future delivery routes.

8. Relevance to Welsh Government and RLDP Phasing

The programme package provides a practical delivery framework for environmental improvement in the River Usk catchment. It brings together funded, proposed and developing measures that support nutrient reduction, improved water quality, habitat recovery, catchment resilience and the alignment of restoration activity with RLDP phasing.

The confirmed extensions of Ffermio Bro to March 2028 and the Central Monmouthshire Opportunity Catchment to 2030 are significant because they provide continuity for landscape-scale agricultural delivery beyond the initial programme year. This strengthens the overall restoration pathway by maintaining support for land management changes that can contribute to water quality, nature recovery and catchment resilience.

The combined programme demonstrates that:

- restoration activity is already underway through Ffermio Bro, Four Rivers for Life, River Gavenny Project and Usk Catchment Partnership activity;
- Welsh Government-funded landscape-scale farming intervention is now confirmed through to March 2028;
- medium-term ecological network delivery is proposed through Nature Networks 5 between 2026 and 2029;
- long-term landscape-scale catchment recovery is being developed through Landscape Connections from 2027 to 2037;
- monitoring and evidence gathering are embedded through the Usk Catchment Partnership Knowledge Hub, NFM monitoring, Nature Networks monitoring pilots and Landscape Connections proposals.

These measures provide a basis for linking development phasing to demonstrable environmental progress. The programme operates as a phased restoration pathway, with delivery milestones, monitoring mechanisms and partnership governance that can help ensure RLDP growth is aligned with catchment recovery.

9. Conclusion

The evidence set out in this briefing demonstrates that restoration of the River Usk SAC is not dependent on a single project, funding stream or future aspiration. Rather, it is being delivered through an integrated programme of catchment-scale interventions that are already underway and which extend through the early, middle and later stages of the RLDP period. The combined activity of the Usk Catchment Partnership, Four Rivers for LIFE, Ffermio Bro, the Central Monmouthshire Opportunity Catchment, the River Gavenny Project, Nature Networks 5 and the proposed Landscape Connections programme represents a comprehensive restoration pathway operating from 2022 through to at least 2037.

Collectively, these programmes address the principal pressures affecting the River Usk SAC through nutrient reduction, habitat restoration, natural flood management, sustainable land management, ecological network enhancement, invasive species control, community engagement and long-term monitoring. Importantly, they also provide the governance, evidence base and adaptive

management framework required to demonstrate progress and respond to emerging evidence over time.

The delivery pipeline shows that environmental improvement is occurring ahead of, and alongside, planned development. Restoration actions are therefore not deferred until after growth takes place but are embedded within a long-term programme of catchment recovery with clear milestones, investment mechanisms and partnership commitments. This provides a realistic and defensible basis for linking development phasing to environmental outcomes.

In this context, the River Usk SAC should be viewed not as a static constraint to growth, but as the focus of a coordinated programme of environmental recovery. The scale, diversity and duration of the measures identified provide confidence that meaningful ecological improvement can be achieved over the RLDP period and beyond. Consequently, a policy approach that ties the release and timing of development to demonstrable restoration progress, monitoring evidence and catchment recovery milestones is both justified and consistent with the principles of sustainable development, ecosystem resilience and the long-term objectives of Welsh Government policy.

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Appendix B rLDP Nutrient budget by proposed phasing of the rLDP

Table A1 Timeline of projected housing units from the rLDP to be constructed annually within the River Usk catchment.

RLDP Policy Rep	Site Name	Settlement	Catchment Area	Status	Gross Site Area (ha)	Total Site Capacity	Open Market Homes	Affordable Homes	Phasing of Development (Base Date 1 st April 2025) Estimated Completions								
									2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mnths
HA1	Land to the East of Abergavenny	Abergavenny	Usk	Allocation	35.9	500	250	250	0	0	0	70	90	90	90	90	70
HA5	Land at Penlanlas Farm	Abergavenny	Usk	Allocation	6.17	100	50	50	0	0	50	50	0	0	0	0	0
HA10	South of Monmouth Rd	Raglan	Usk	Allocation	4.5	54	27	27	0	0	40	14	0	0	0	0	0
HA11	Land East of Burrium Gate	Usk	Usk	Allocation	2.6	40	20	20	0	10	30	0	0	0	0	0	0
HA12	Land West of Trem yr Ysgol	Penperlleni	Usk	Allocation	3.4	42	21	21	0	0	30	12	0	0	0	0	0
HA14	Land at Churchfields	Devauden	Usk	Allocation	1	20	10	10	0	0	0	10	10	0	0	0	0
HA15	Land East Little Mill	Little Mill	Usk	Allocation	1.68	20	10	10	0	5	15	0	0	0	0	0	0
HA16	Land North of Little Mill	Little Mill	Usk	Rollover allocation	0.87	15	7	8	5	10	0	0	0	0	0	0	0
HA17	Land adjacent Llanellen Court Farm	Llanellen	Usk	Allocation	1.56	26	13	13	0	0	0	0	10	16	0	0	0
N/A	Windfall Allowance	Abergavenny	Usk	Windfall		100	50	50	0	0	0	0	0	30	30	30	10
N/A	Windfall Allowance	Secondary Settlements of Raglan, Penperlleni, Usk	Usk	Windfall		20	10	10	0	0	0	0	0	10	10	0	0

Table A2 Timeline of projected housing units from the rLDP to be constructed annually within the River Wye catchment.

RLDP Policy Ref	Site Name	Settlement	Catchment Area	Status	Gross Site Area (ha)	Total Site Capacity	Open Market Homes	Affordable Homes	Phasing of Development (Base Date 1 st April 2025) Estimated Completions								
									2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033 +9mths
HA6	Land at Rockfield Road	Monmouth	Wye	Allocation	1.5	60	30	30	0	0	0	0	40	20	0	0	0
HA4	Land at Leasbrook	Monmouth	Wye	Allocation	11	270	135	135	0	0	25	50	50	50	50	45	0
HA7	Land at Drewen Farm	Monmouth	Wye	Rollover allocation with planning permission	6.6	110	71	39	0	10	50	50	0	0	0	0	0
HA8	Tudor Road, Wyesham	Monmouth	Wye	Rollover allocation with planning permission	2.1	50	0	50	25	25	0	0	0	0	0	0	0
N/A	West of Rockfield Road	Monmouth	Wye	Commitment	2.86	70	45	25	0	35	35	0	0	0	0	0	0
N/A	Windfall Allowances	Monmouth	Wye	Windfall		10	6	4	0	0	0	0	0	2	2	2	2

Appendix C Indicative Wetland Planning, Design and Construction Timeline

Table B. 1 Indicative timeline for planning, design and construction of wetlands.

Stage	Timescale	Requirements	Timescale reasoning
Pre-planning	1-6 months from Day 1	- Consultation with NRW and DCWW - Early feasibility studies	6 months of pre-planning is a precautionary estimate for early consultation with NRW and DCWW to ensure that proposals can be taken forward and for early feasibility studies. This stage can be completed concurrently with the planning and design stage.
Planning and design	1 – 18 months from Day 1	- Identify and secure land. - Baseline monitoring to inform design / quantify nutrient reduction. - Planning / impact assessment	18 months generally considered a precautionary timescale for the planning and design stage. This is to take into account a full survey window for ecology and mitigation design. Other stages such as identifying and securing land and quantifying nutrient reduction may be completed at an earlier stage.
Regulatory approval	18 – 24 months from Day 1	- Submit planning application. - Obtain NRW permits.	A further 6 months is likely required after planning and design to submit the planning application and obtain NRW permits.
Construction	24 – 30 months from Day 1	- Physical basin creation. - Planting of macrophytes. - Flow control structures.	A further 6 months of construction is likely required before completion of the wetland.
Commissioning / Maturation	30 months from Day 1	- Establish vegetation in order for effective basin functioning. - Monitoring of performance. - Strategic credit system launch. - Ongoing asset inspection / reporting.	Commissioning and maturation will take place over the months and years following completion of construction. Performance monitoring will be used to determine maturation.



