



Dear Ms de-Courcey and Ms MacFarlane,

Monmouthshire Replacement Local Development Plan (RLDP) – Further Information

This letter sets out the Council's response to the matters raised by the inspectors in their letter of 17th June 2026.

Matter 1:

Council to identify, where possible, the other measures being relied upon across the lifetime of the LDP to avoid deterioration and achieve restoration of the SACs, and whether these can be regarded as 'secure' in line with the requirements of paragraph 6.6.33 of the Interim Planning Policy Statement. Interdependence between the delivery of these measures and development in the LDP should be clearly identified, which will enable new development to take place where delivery milestones are achieved (as per paragraph 6.6.34). Where measures are identified, opportunities for integrated mitigation, including through developer contributions, which increase the scale, magnitude or scope of restoration measures, or speed up the delivery of such measures, should be considered (in line with paragraph 6.6.35).

Council Response:

The Council 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. In addition to capacity identified through NRW's Review of Permits, various other measures including actions delivered through the Nutrient Management Boards 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. The Council 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.

A range of integrated restoration measures relevant to the River Usk Special Area of Conservation (SAC) are set out in the appended Briefing Note - River Usk SAC: Restoration Measures, Delivery Programmes and Implications for Welsh Government and RLDP Phasing (Appendix 1). The Briefing Note identifies delivery mechanisms, timescales, monitoring

arrangements and their relationship to environmental improvement and RLDP phasing, and 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 actions supporting nutrient reduction, SAC recovery, sustainable land management, climate resilience, nature recovery, flood risk reduction and resilient communities. The delivery pipeline set out in the document 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. Restoration actions are therefore not deferred until after growth takes place but are integrated within a long-term programme of catchment recovery with clear milestones, investment mechanisms and partnership commitments. This Briefing Note evidences the ongoing natural restoration measures that the Council and its delivery partners are delivering. Some of these measures have already commenced and, in combination with, NRW's emerging Catchment Nutrient Recovery Plans (CRNP) evidences a catchment wide integrated approach to the restoration of the river health in Monmouthshire.

The Council also recognises the potential role of integrated mitigation measures in supporting SAC restoration objectives. Opportunities to secure developer-funded mitigation, where appropriate and necessary, will be considered through the development management process, including measures that increase the scale or accelerate the delivery of nutrient reduction and restoration measures. This approach is reflected in Policy NR3 (as updated) and is consistent with paragraphs 6.6.34 and 6.6.35 of the Interim Planning Policy Statement and ensures that development remains aligned with the achievement of environmental outcomes across the lifetime of the Plan.

At this stage in the RLDP process the Council considers that the measures outlined above can be regarded as 'secure' in line with the requirements of paragraph 6.6.33 of the Interim Planning Policy Statement. This reflects the Welsh Government's Position Statement on Nutrients submitted to the Council's RLDP Examination, which reinforces the need for a flexible and adaptable approach to addressing nutrients through the development plan process in Wales. It clarifies that LDPs in nutrient affected SACs should focus on an integrated approach to mitigation, evidence that measures are achievable in practice (noting that there will be some uncertainty on costs, technologies and detailed measures at plan preparation stage), set out monitoring and review mechanisms and a policy caveat approach, with nutrient neutrality as a backstop measure where necessary. This approach is reflected in the Plan's policy framework (as updated) and supporting evidence base.

Matter 2: *Council to consider, and provide a response on, the role of Catchment Nutrient Reduction Plans (CNRPs) as referred to within Welsh Government's 'Position Statement – Nutrients' [ED21], and whether these represent sufficiently 'secure' measures given their emerging nature.*

Council Response:

The Council has considered the role of Catchment Nutrient Recovery Plans (CNRPs) as referenced in Welsh Government's Position Statement – Nutrients (ED21) and NRW's letter to PEDW (1st July 2026), including the Catchment Nutrient Recovery Plan Summary Note. It is acknowledged that the CNRP process remains at an early stage of development and that, at present, no timescales have been confirmed for the preparation of CNRPs for the River Wye and River Usk catchments.

In light of their emerging status, it is not considered appropriate to rely on the future preparation or delivery of CNRPs as a standalone mitigation measure underpinning the RLDP or

its Habitats Regulations Assessment. Rather, CNRPs are regarded as a potential future component of the wider integrated approach being developed by Welsh Government, NRW and other partners to secure long-term nutrient reduction and SAC recovery.

The Council considers that the measures currently afforded the greatest degree of certainty are those already being implemented through established regulatory and governance mechanisms, including NRW's Review of Permits, wastewater treatment improvements and wider nutrient management initiatives being progressed through Nutrient Management Boards and partner organisations. These measures form the basis of the Council's assessment of nutrient management capacity over the Plan period.

Should NRW prepare CNRPs for the River Wye and/or River Usk during the lifetime of the RLDP, they could provide an important framework for coordinating additional recovery actions and identifying opportunities for integrated mitigation, including developer contributions where appropriate. CNRPs have the potential to support sustainable development proposals by contributing to catchment restoration and improving river health, with their role expected to strengthen delivery arrangements in the RLDP. CNRPs should not be relied upon in isolation to evidence compliance with paragraph 6.6.33 of the Interim Planning Policy Statement. Their future contribution should instead be viewed as supplementary to the measures already identified above and in the Plan's evidence base, which sets out an integrated approach to river restoration across the catchments.

Matter 3: *Council to consider the need for further amended wording for Policy NR3 and its supporting text to incorporate a 'policy caveat' approach. If further changes are proposed, these should be reflected in an updated HRA, which should be consulted upon with NRW, and schedule of proposed changes to the LDP. The Council to also consider whether consequential updates are required to the mitigation action plan (noting the requirements of paragraph 30 of Welsh Government's 'Clarification Note on applying the Tests of Soundness to LDPs where additional nutrients may impact on SACs' (March 2026)), Infrastructure Delivery Plan and viability evidence base.*

Council Response:

In recognition that there are several pathways through which development may be possible in nutrient affected SAC catchments, Policy NR3 has been updated to ensure an integrated approach to management, restoration and mitigation having regard to latest national guidance from WG and NRW. The updated policy and text are set out in Appendix 2.

As further changes are proposed to Policy NR3 and its supporting text, the Deposit RLDP Schedule of Proposed Changes has been updated accordingly and is attached at Appendix 3. Consequential changes to the Infrastructure Delivery Plan (IDP) are also proposed and are set out in the Schedule of Proposed Changes to the RLDP.

These changes will be reflected in an updated HRA which is currently being prepared to reflect the above referenced updated policy framework and to address comments received from NRW on the previous HRA update. The Council will submit the updated HRA to the Inspectors at the earliest opportunity and consult NRW on the update accordingly. The Council would be content to agree appropriate submission timescales for this work with the Inspectors. The Council will also explore updating the Statement of Common Ground between MCC and NRW accordingly. At this stage, the Council does not consider it necessary to update to the Nutrient Mitigation Action Plan and viability evidence base.

Please let us know if you have any further questions on the above.

Yours sincerely,

Andrew Jones
Head of Planning/Pennaeth Cynllunio

APPENDIX 1

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	Restores river habitat, improves water quality, reconnects floodplains, removes fish migration barriers, controls invasive species and enhances biodiversity.

		achieve long-term ecological recovery.	
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 species control and litter management.	Reconnects communities to their local watercourse alongside practical projects to reconnect 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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Usk Catchment Partnership (n.d.) *Shared vision*. Available at: <https://uskcatchmentpartnership.wales/shared-vision/> (Accessed: 2 July 2026).

Usk Catchment Partnership (2025) *River Usk Nutrient Management Plan*. Available at: https://uskcatchmentpartnership.wales/wp-content/uploads/2025/08/Usk-NMP_Final.pdf (Accessed: 2 July 2026).

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APPENDIX 2

Policy NR3 – Protection of Water Sources and the Water Environment¹

(Updated policy text shown as underscored)

Development, which may impact upon the water environment and associated land, will only be permitted where it:

- a) Would not harm or pose an unacceptable risk to the capacity or flow of groundwater, surface water or coastal water systems;
- b) Would not harm or pose an unacceptable risk to the quality and quantity of ground waters, surface waters, wetlands or coastal water systems including, where appropriate, their ecological and amenity value; and
- c) Where practicable and reasonable, improves water quality.

Notwithstanding the above, development likely to have a significant effect on a European Site, either alone or in combination with other plans or projects, will only be permitted where the competent authority is satisfied, through a Habitats Regulations Assessment, that there will be no adverse effect on site integrity and that the conservation objectives of the designated site can be met. This may be achieved through avoidance measures, wider restoration measures, strategic and/or project-specific mitigation, or a combination of such measures, where these are demonstrated to be effective, deliverable and sufficiently certain.

Thus, within the hydrological catchment of the riverine SACs which are evidenced to be failing regarding nutrients, development proposals will only be permitted where it can be demonstrated that:

- a) They are not a source of additional phosphorus or other nutrient pollution; or
- b) Where they are a source of additional phosphorus or nutrient pollution, there is no pathway by which those nutrients can enter the SAC water body environment; or
- c) Measures associated with the proposed development are put in place that remove reasonable scientific doubt, in perpetuity and for the lifetime of the development, to enable a conclusion of no adverse effect on site integrity.

For development creating wastewater discharges, planning permission will only be granted where it can be demonstrated that sufficient capacity exists within the environmental permit limits of the Wastewater Treatment Works serving the development, taking account of fair-share principles which may include the implementation of restoration measures within the relevant SAC catchment as part of a coordinated approach to improving river health. Where necessary, the phasing of development will be required to align with the delivery of wastewater infrastructure improvements.

¹ The previous version of Policy NR3 and supporting text to nutrient impacts on water quality in the Riverine SACs can be viewed in the updated Deposit RLDP Schedule of Proposed Changes (July 2026)

Where a fair-share approach cannot be demonstrated as secure, development proposals may be permitted where alternative mitigation measures are agreed with the Council and are demonstrated to be able to avoid adverse effects on site integrity. In such circumstances, support of the integrated approach, strategic or developer-led mitigation must achieve nutrient neutrality for the lifetime of the development.

Where mitigation measures are required, applications must be accompanied by a **Nutrient Mitigation Assessment** demonstrating a mitigation strategy that is effective, deliverable, and legally secured in perpetuity where required, and provides reasonable scientific certainty that no adverse effect on site integrity will occur and that site conservation objectives can be met.

UPDATED SUPPORTING TEXT TO REVISED NUTRIENT IMPACTS ELEMENT OF POLICY NR3

Nutrient Impacts on Water Quality in Riverine Special Areas of Conservation (SAC)

The impact of excess nutrients, including phosphates, has become a significant environmental challenge in riverine SACs across the country, including Wales. These rivers are designated for their high ecological value; however, many are failing to meet strict phosphorus targets designed to protect sensitive habitats and species.

The Rivers Usk and Wye in Monmouthshire are designated as SACs and are, therefore, subject to strict protection under the Conservation of Habitats and Species Regulations 2017 which require any plan or project likely to have a significant effect on a European site to be subject to Habitats Regulations Assessment (HRA). The extent of the Usk and Wye River SAC catchments in Monmouthshire are illustrated in Map XX and the Constraints Map accompanying the RLDP.

In January 2021, NRW published a report that presented the assessment of compliance against recently tightened phosphorus water quality targets for SAC rivers. The report indicated that over 60% of SAC water bodies were failing the new targets for phosphorus. More recent data does, however, indicate that water quality across the rivers in Monmouthshire has improved since 2021.

The latest monitoring data for the River Usk catchment demonstrates that 54% of waterbodies in the catchment are meeting their phosphorus targets which is an improvement from 2021². Notwithstanding this, as of 2026 nutrient neutrality remains a requirement across the whole Usk catchment. 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. Ongoing actions to address phosphorus levels in the Usk catchment are expected to continually improve water quality in this waterbody throughout the RLDP period. The position will be kept under review.

Whilst previously failing 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.

² River Usk Nutrient Management Plan (April 2025)

The Council is required to ensure, through the RLDP and development management process, that development within the relevant catchments will not result in adverse effects on the integrity of the European sites, either alone or in combination with other plans and projects. Development proposals that generate excess phosphorus within these catchments must, in the absence of sufficient headroom created by the Review of Permits or where de minimis can be robustly evidenced, provide mitigation to demonstrate nutrient neutrality to ensure that there is no net increase in nutrient loading to the affected sites.

Reflecting the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales³, Policy NR3 makes clear that development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures. As such, planning permission may only be granted where the competent authority is able to conclude that there will be no likely adverse effect on the integrity of a European site, either alone or in combination with other plans and projects.

The policy provides a clear framework to ensure that development proposals with the potential to affect the integrity of European sites are assessed appropriately and consistently, in accordance with national legislation and guidance. It allows proposals to proceed where impacts can be avoided or adequately mitigated.

Prior to considering mitigation pathways, current NRW guidance suggests that if the relevant Wastewater Treatment Works (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'. Further detail on this approach will be set out in SPG.

Where it cannot be confirmed that a site is able to be 'screened out', for example due to location in a WwTW catchment that is yet to be upgraded, then mitigation measures may be secured where necessary to ensure there is no adverse impact on the integrity of European sites. In accordance with Welsh Government and NRW guidance, mitigation may take a variety of forms, including on-site and off-site measures (but upstream of the point of impact to the SAC), contributions to strategic mitigation schemes under the integrated approach or developer-led/project specific mitigation, provided that such measures are demonstrated to be effective, deliverable, and secured in perpetuity.

To grant planning permission, the planning authority must be satisfied that appropriate measures to avoid deterioration of water quality and adverse effects on site integrity and the attainment of conservation objectives are secured. Evidence must demonstrate:

- That any improvements necessary to avoid adverse effects on site integrity have been quantified;

³ Including NRW advice [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#) and WG planning guidance [Clarification note: applying the tests of soundness to Local Development Plans \(LDPs\)](#) and [Planning Guidance - Development in SAC Rivers](#)

- That the actions required have been clearly identified and are supported by an appropriate delivery mechanism;
- That there is a clear and deliverable timetable for implementation that will achieve the relevant conservation objectives and nutrient targets.

Supplementary Planning Guidance (SPG) will be prepared to provide further clarification on the implementation of this policy. This will reflect the nutrient neutrality evidence base that has been prepared to inform the RLDP, including a Strategic Mitigation Options Report, Nutrient Mitigation Action Plan and the forthcoming Developer Mitigation Handbook. These documents identify and provide detail on the range of mitigation options available and their implementation, including consideration of threshold (de minimis) approaches, integrated catchment improvements, strategic or developer-led nutrient neutrality approaches.

As national guidance and requirements in relation to nutrient neutrality continue to evolve, the Developer Mitigation Handbook will be reviewed and updated periodically to reflect changes in nutrient mitigation requirements as and when required.

APPENDIX 3

Monmouthshire Replacement Local Development Plan

2018-2033



Deposit RLDP Schedule of Proposed Changes (July 2026)

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This paper sets out an update to the previously published Schedule of Minor Changes (SD16). It includes proposed minor amendments to the RLDP following the Deposit consultation, noted as 'Post Deposit' in the table below, and proposed changes following the Plan's submission to PEDW, noted as 'Post Submission'. Amendments proposed as a result of the Plan's updated nutrient evidence, set out in the Phosphate Position Paper (ED15c), and to reflect the Council's response to the Inspectors' request for further information on phosphorus (July 2026) are also incorporated into the table to provide a consolidated list of suggested changes. Where changes are superseded by further amendments, these are ~~struck through~~ for clarity.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Table of Contents					
i-iv	Table of Contents	Correction	Updated inconsistencies throughout the table of contents and Deposit Plan with regards to the use of capitals and text appearing in bold in some instances.	Post Deposit	Formatting / grammar
General					
	Throughout the Plan	Correction	Amend phosphates references to phosphorus, as requested by NRW.	Post Submission	Update
Introduction					
8	1.2.1	Correction	Several lines of text appear in a heavier font. Adjust font to match to other text.	Post Deposit	Formatting
10	1.2.14	Update	Delete paragraph 1.2.14 which sets out how to comment on the Deposit Plan and replace with the following text: The Deposit Plan was subject to community and stakeholder engagement and consultation over a six-week period from 4th November – 16th December 2024. Details of the consultation/engagement and responses received are set out in the RLDP Deposit Consultation Report (October 2025).	Post Deposit	Updated position
Context					
12	2.1.2 / 2.1.3	Correction	References to Bannau Brycheiniog appear in a heavier font. Adjust font to match to other text.	Post Deposit	Formatting
13	2.1.7	Correction	References to Bannau Brycheiniog appear in a heavier font. Adjust font to match to other text.	Post Deposit	Formatting
15	2.1.18	Update	Delete "As of March 2023, of the 50.12ha of allocated SEA1 sites in the Adopted LDP, just over 40 hectares of land remained available for B1, B2 and B8. The employment land take-up rate has averaged 1.8 hectares per annum since the adoption of the LDP in 2014." Replace with:	Post Deposit	Updated position

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>As of March 2025, of the 50.12ha of allocated SAE1 sites in the Adopted LDP, just over 36ha of land remained available for B1, B2 and B8 uses. Details of employment take-up can be found in the latest Employment Monitoring Report on the Council's website.</i>		
15	Footnote 14	Update	Update reference to the Employment Land Background Paper from December 2023 to 2024.	Post Deposit	Updated position
RLDP Strategic Framework					
26	Objective 2	Amendment	Include the following additional wording to Objective 2: 'along with the County's local centres' after the reference to Usk. Objective 2 will read: <i>To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth and Usk, along with the County's local centres, as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands and supporting adaptation to meet the needs of the evolving role of the high street.</i>	Post Deposit	In response to representations received by Richborough Estates (1663) which highlights that no reference is made to the designated local centres.
34	6.1.2	Correction	After the word 'responding', insert 'to'.	Post Deposit	Grammar
34	6.1.3 – second bullet point	Correction	After reference to Table 2 at the end of the first bullet point insert 'Summary of Spatial Distribution of Housing Provision' and delete the word 'below'.	Post Deposit	Factual correction to clarify what table 2 relates to.
35	S1	Correction	Delete the word 'indicative' noted in relation to the 15% flexibility under Strategic Policy S1 – Growth Strategy.	Post Deposit	Factual correction
37	6.3.4	Correction	Delete 'This ambitious policy may require Welsh Government policy position changes on use of Social Housing Grant or other public sector funding. Submitted viability assessments demonstrate at the time of publication that these sites are deliverable. However, it is recognised this could change in the future and additional public subsidy may be required'.	Post Submission	Factual correction
39-41	S2	Update	Update Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, to reflect consequential changes to the indicative percentage of distribution of residential growth and indicative number of homes following the 2024/25 housing monitoring period. The changes are as follows: ● Abergavenny – replace 1,362 indicative number of homes with 1,353. ● Chepstow – replace 13% indicative percentage of distribution with 14% and 829 with 868 indicative number of homes. ● Monmouth – replace 923 indicative number of homes with 913.	Post Deposit	Updated to reflect consequential changes as a result of the 2024/25 housing monitoring period.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason																																				
			Caldicot (including Severnside) – replace 2,190 indicative number of homes with 2,161. Secondary Settlements – replace 6% indicative percentage of distribution with 5% and 350 with 347 indicative number of homes. Main and Minor Rural Settlements – replace 556 indicative number of homes with 561.																																						
39-41	S2	Update	Update Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, to reflect consequential changes to the indicative percentage of distribution of residential growth and indicative number of homes following the 2025/26 housing monitoring period. Strategic Policy S2 will now read: Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy In order to deliver sustainable and resilient communities for all, the main focus for new development will be distributed based on the following settlement hierarchy: <table> <tr> <th colspan="2"></th><th colspan="2">Distribution of Residential Growth*</th><th colspan="2">Distribution of Employment Growth</th></tr> <tr> <th colspan="2">Settlement Hierarchy</th><th>Indicative % of distribution</th><th>Indicative No. of homes</th><th>% of distribution</th><th>Hectares</th></tr> <tr> <td>Tier 1</td><td>Primary Settlements:</td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td>Abergavenny (inc. Llanfoist)</td><td>22%</td><td>1,353</td><td>3%</td><td>1.7ha**</td></tr> <tr> <td></td><td>Chepstow</td><td>15%</td><td>954</td><td>11%</td><td>6.4ha</td></tr> <tr> <td></td><td>Monmouth (inc. Wyesham)</td><td>15%</td><td>907</td><td>10%</td><td>5.84ha</td></tr> </table>			Distribution of Residential Growth*		Distribution of Employment Growth		Settlement Hierarchy		Indicative % of distribution	Indicative No. of homes	% of distribution	Hectares	Tier 1	Primary Settlements:						Abergavenny (inc. Llanfoist)	22%	1,353	3%	1.7ha**		Chepstow	15%	954	11%	6.4ha		Monmouth (inc. Wyesham)	15%	907	10%	5.84ha	Post Submission	Updated to reflect consequential changes as a result of the 2025/26 housing monitoring period.
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				Caldicot (inc. Severnside Area comprising of: Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook)	35% across Severnside Area	2,148 across Severnside Area	65%	37.86ha		
			Tier 2	Secondary Settlements: Penperlleni Raglan Usk	5% across Secondary Settlements	342 across Secondary Settlements	10%	6.05ha		
			Tier 3	Main Rural Settlements: Devauden Dingestow Little Mill Llandogo Llanellen Llangybi Llanover Llanvair Discoed Mathern Pwllmeyric Shirenewton/Mynyddbach St Arvans Tintern Trellech Werngifford/Pandy	8% across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	525 across Main Rural and Minor Rural Settlements (Tiers 3 and 4)	0%	0ha		
			Tier 4	Minor Rural Settlements: Bettws Newydd Broadstone /Catbrook Brynygwenin Coed y Paen Cross Ash Cuckoo's Row						

Page	Paragraph, Table or Policy	Type of Change	Details of Change					Stage	Reason
			Great Oak Grosmont Gwehelog Llanarth Llanddewi Rhydderch Llandegveth Llandenny Llangwm Llanishen Llansoy Llantilio Crossenny Llantrisant Llanvair Kilgeddin Llanvapley Mitchel Troy Penallt Penpergwm The Bryn The Narth Tredunnock Settlement boundaries will be defined for Settlement Tiers 1 – 3, within which the principle of development is considered to be acceptable, subject to detailed policy considerations set out in the RLDP. Within Tier 4 – Minor Rural Settlements, minor small scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP. Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.						

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
39-41	S2	Amendment	Amend Policy S2 to refer to 'small-scale rounding off' in relation to Tier 4 settlements. The relevant part of the policy will now read: <i>'Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.'</i>	Post Deposit	Updated for consistency with Policy H3 – Residential Development in Minor Rural Settlements, in response to representations made by Carney Sweeney Ltd (1366).
41	S2	Amendment	Delete the following text from Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed for the following types of development, subject to satisfying detailed planning criteria: • Acceptable conversions of rural buildings • Sub-division of existing dwellings • Rural Enterprise Dwelling • One Planet Development • Rural diversification and rural enterprise uses • Affordable housing exception sites adjoining settlement boundaries to meet local needs • Gypsy and Traveller Sites Replace deleted text with the following: <i>Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</i>	Post Deposit	Updated to reflect that Strategic Policy S2 does not provide an exhaustive list of developments that could be considered in the open countryside. Reference to development justified by national planning policy is therefore considered to be a more appropriate approach and responds to representations raised by Cllr. Frances Taylor (1677), Sandra Lloyd (1779), Magor with Undy Town Council (3059), Claire Richards (3492).
41	S2	Correction	Delete the word 'indicative' noted in relation to the 15% flexibility under Strategic Policy S1 – Growth Strategy.	Post Deposit	Factual correction
43	Table 2	Update	Update figures to reflect consequential changes to the housing supply components following the 2024/25 housing monitoring period.	Post Deposit	Updated to reflect consequential

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason																																																						
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43	Table 2	Update	Update figures to reflect consequential changes to the spatial distribution of the housing supply components following the 2025/26 housing monitoring period. <table> <tr> <th>Settlement</th><th colspan="2">Commitment</th><th>Allowances</th><th colspan="2">Allocations</th></tr> <tr> <th></th><th>Completions 2018-2026</th><th>Existing Commitments</th><th>Total Allowances (Small Sites; Windfalls)</th><th>LDP Rollover Allocations</th><th>RLDP New Housing Allocations (Dwellings)</th></tr> <tr> <td>Abergavenny (incl. Llanfoist)</td><td>577</td><td>12</td><td>164</td><td>0</td><td>600</td></tr> <tr> <td>Chepstow</td><td>546</td><td>153</td><td>109</td><td>0</td><td>146</td></tr> <tr> <td>Monmouth (incl. Wyesham)</td><td>295</td><td>70</td><td>52</td><td>160</td><td>330</td></tr> <tr> <td>Caldicot (incl. Severnside)</td><td>945</td><td>286</td><td>107</td><td>0</td><td>810</td></tr> <tr> <td>Secondary Settlements</td><td>113</td><td>59</td><td>34</td><td>0</td><td>136</td></tr> <tr> <td>Rural Settlements</td><td>229</td><td>11</td><td>162</td><td>15**</td><td>108**</td></tr> <tr> <td>Total</td><td>2,705</td><td>591</td><td>628</td><td>175</td><td>2,130</td></tr> </table>	Settlement	Commitment		Allowances	Allocations			Completions 2018-2026	Existing Commitments	Total Allowances (Small Sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocations (Dwellings)	Abergavenny (incl. Llanfoist)	577	12	164	0	600	Chepstow	546	153	109	0	146	Monmouth (incl. Wyesham)	295	70	52	160	330	Caldicot (incl. Severnside)	945	286	107	0	810	Secondary Settlements	113	59	34	0	136	Rural Settlements	229	11	162	15**	108**	Total	2,705	591	628	175	2,130	Post Submission	Updated to reflect the consequential changes as a result of the 2025/26 housing monitoring period.
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43	Table 2	Correction	Delete the word 'indicative' noted in relation to the 15% flexibility under Strategic Policy S1 – Growth Strategy.	Post Deposit	Factual correction																																																						
46	Links to Wider Policy Framework	Correction	Update reference to the Housing Background Paper to refer to October 2025.	Post Deposit	Factual correction																																																						
46	Links to Wider Policy Framework	Correction	Update to reference to the Candidate Sites Assessment Report – Updated October 2025.	Post Deposit	Factual correction																																																						

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Managing Settlement Form					
47	OC1	Amendment	Policy OC1, criterion a) – delete ‘and complies with Policies LC1, GI1, T1, RE3, RE4 and NR1.’ Criterion a) will read: <i>a) the proposal is satisfactorily assimilated into the landscape;</i>	Post Deposit	To simplify the policy and consistent with the suggested change to Policy S2, it is proposed to delete reference to a specific set of policies and apply national planning policy and RLDP policies as appropriate depending on the proposal being considered. The change responds to representations from Abergavenny District Society (1367), Sandra Lloyd (1779), Cllr. Dymock (2489) and Claire Richards (3492).
Placemaking and Design					
50	S3	Amendment	Update Strategic Policy S3 to include reference to 'enhance' in the wording of the opening sentence: <i>Development will contribute to creating high quality, attractive and sustainable places that support and enhance the health and well-being of the community and respond to climate change.</i>	Post Deposit	Updated to reflect the representations made by the Aneurin Bevan Health Board (1209) to acknowledge the importance of ‘enhancing’ the health and well-being of the community in addition to supporting it.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
51	8.3.2	Correction	Update first sentence of paragraph 8.3.2 to omit reference to the Usk Air Quality Area as this will be revoked by the end of June. Paragraph 8.3.2 will read: <i>'Although air quality in Monmouthshire generally meets current standards, there is one Air Quality Management Area (AQMA) within the County at Hardwick Hill/Mount Pleasant in Chepstow (as shown on the Constraints Map).'</i>	Post Submission	Factual Correction
52	PM3	Correction	Criterion f) - insert word 'be' after 'there would'. Criterion f) will read: <i>f) there would be no adverse impact on public or highway safety.</i>	Post Deposit	Grammar
53	8.5.3 & 8.5.4	Correction	Delete '2016' from paragraph 8.5.3 and 8.5.4 and replace with '2023'.	Post Submission	Factual Correction
55	Footnote	Amendment	Update footnote 31 to 'Section 160 of the Historic Environment (Wales) Act 2023, which refers to the duty to preserve or enhance the character or appearance'	Post Submission	Factual Correction
Climate Change					
60	S4	Amendment	Delete criterion i) which reads: Avoiding locating development in areas at risk of flooding, or where appropriate, minimising the risk of flooding including the incorporation of measures such as Sustainable Drainage Systems (SuDs) and flood resilient design; Replace with: <i>Avoiding locating development in areas at risk of flooding or, where appropriate and following national policy, ensure the risks and consequences of flooding are manageable while incorporating SuDs and flood resilient design;</i>	Post Deposit	Updated to address the potential confusion of readers interpreting the criterion to indicate that the incorporation of SuDs or resilient design in areas of flood risk overcomes a flood risk constraint, in response to representations raised by Natural Resources Wales (NRW) (1412), Sandra Lloyd (1779) and Clare Richards (3492)

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
60	9.1.4	Correction	Replace reference to S9 – Sustainable Transport with S13 – Sustainable Transport and S17 – Green Infrastructure, Landscape and Nature Conservation with S5 – Green Infrastructure, Landscape and Nature Conservation.	Post Deposit	Factual correction
61	9.1.5	Amendment	Delete the following text at paragraph 9.1.5: Following new evidence regarding the environmental impacts of phosphate in watercourses Natural Resources Wales (NRW) has adopted tighter targets for the water quality of the River Usk and River Wye. In this respect, development proposals have to ensure that there will be no adverse effects on the site integrity of the two riverine SACs, the River Usk SAC and the River Wye SAC, regarding water quantity, level and flow. In particular, development will not be permitted if it cannot be accommodated under the Review of Consents for flow in these rivers, including the maximum permissible percentage reduction from naturalised flow levels and hands-off flow conditions. Replace with the following text: <i>The River Wye and River Usk and many of their tributaries are designated as a riverine Special Area of Conservation (SAC). As a result, the habitats and species that exist there have been identified as being of a higher value and requiring more stringent river flow protection. This level of protection has been determined through a process known as the Habitats Directive Review of Consents (HDRoC). The conclusions of the River Wye and River Usk HDRoC process have been integrated with NRW's principles of Catchment Abstraction Management Strategy (CAMs) to set the licensing policy on the Wye and Usk.</i> <i>The most significant abstraction pressure in the River Usk catchment is public water supply. Abstraction for this purpose accounts for approximately 94% of the catchment's total annual abstraction. The catchment is a key strategic resource for supplying potable water to much of South-East Wales and an extensive system of water transfers has been developed to distribute this water across the region. Aside from public water supply, the main pressure on water resources in the catchments is from agricultural businesses where water is required for trickle and spray irrigation and other agricultural uses.</i>	Post Deposit	Representations made by NRW (1412) note that the current wording confuses the issue of phosphates (i.e. nutrients and water quality) with water resources (i.e. water quantity and flows). NRW recommend focussing on water quantity and resources within the context of Strategic Policy S5 – Climate Change, while focussing on water quality and the on-going issue of nutrients in Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery.
63	9.3.1	Amendment	Remove reference to 'highly vulnerable' from paragraph 9.3.1. The second sentence of paragraph 9.3.1 will read: <i>In accordance with national guidance, S4 seeks to steer development away from flood risk areas, to assess the implications of development in areas of flood risk and to ensure that new development does not increase that risk of flooding elsewhere.</i>	Post Deposit	Updated to address representations made by NRW (1412) clarifying that national planning policy uses a precautionary

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					framework which seeks to avoid all new development away from flood risk in the first instance.
63	9.3.1	Correction	Replace reference to TAN15: Development and Flood Risk (July 2004) with TAN15: Development, Flooding and Coastal Erosion (2025) and reference to the Development Advice Maps with the Flood Maps for Planning. Delete the last sentence of paragraph 9.3.1 – An updated version of TAN15: Development, Flooding and Coastal Erosion was published in September 2021 for consultation with the intention of it coming into effect in December 2021.	Post Deposit	Updated to reflect the publication of TAN15 in March 2025.
63	9.3.2	Correction	Delete paragraph 9.3.2 which sets out the background to the publication of TAN15 which was in preparation at the time. Replace with: <i>In assessing flood risk and development, development proposals will be required to satisfy national policy on flooding set out in PPW12 and TAN15.</i>	Post Deposit	Updated to reflect the publication of TAN15 in March 2025.
63	9.3.4	Correction	Delete '(existing and draft) in the second sentence of paragraph 9.3.4 in relation to TAN 15.	Post Deposit	Updated to reflect the publication of TAN15 in March 2025.
63	CC1	Amendment	Add text to Policy CC1 to clarify the scale of development that will be enforced through the SAB legislation. Policy CC1 will read: Development proposals will be expected to incorporate water management measures, including Sustainable Drainage Systems (SuDS), to reduce surface water run-off and minimise its contribution to flood risk elsewhere. <i>For developments where SuDS approval is required under Schedule 3 of the Flood and Water Management Act (i.e. sites of 100m² or more), compliance will be secured through the Sustainable Drainage Approval Body (SAB) process. For proposals below this threshold, the incorporation of SuDS will be secured through the planning application process.</i> The distribution of SuDS features across the site should be prioritised, reducing the size of any single SuDS feature.	Post Submission	Updated to clarify the relevant regulatory system that SuDS will be enforced through.
63	9.3.4	Correction	Within paragraph 9.3.4 add an 's' to 'Map' to correct 'Flood Map for Planning' to read 'Flood Maps for Planning' and change the following word 'has' to 'have'. The second sentence will read: <i>The</i>	Post Deposit	Grammar

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>SFCA, TAN 15 and Flood Maps for Planning have been used to help inform the spatial strategy and the identification of areas most suitable for development, with allocations made outside of flood risk areas.</i>		
65	9.5.1	Correction	Replace reference to CC4 in the final sentence to CC3.	Post Deposit	Factual correction
69-70	Links to Wider Framework	Correction	Delete reference to TAN15: Development and Flood Risk (2004) and replace with TAN15: Development, Flooding and Coastal Erosion (2025). Delete reference to Development Advice Maps (TAN 15) and replace with Flood Maps for Planning (TAN 15).	Post Deposit	Updated to reflect the publication of TAN15 in March 2025.
Green Infrastructure, Landscape and Nature Recovery					
71-90	10.1.1 – 10.15.5	Amendment	Replace term ‘phosphates’ in the Deposit Plan with term ‘nutrients’ as relevant.	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to ensure all possible water quality attributes are reflected.
72	10.1.6	Amendment	Amend paragraph 10.1.6 to clarify the role the Local Planning Authority has in the preparation of Green Infrastructure Assessments. Paragraph 10.1.6 will read: <i>‘Section 6 Duty and PPW12 also set out that development proposals must adopt a proactive placemaking approach to delivering multi-functional green infrastructure and ecosystem resilience, and this is required to be demonstrated by Local Planning Authorities through Green Infrastructure Assessments. These GI assessments involve an evidence base step wise approach addressing the DECCA themes to inform the design and implementation of projects. Guidance on GI assessments and the step wise approach is set out in PPW12, as well as NRW Area Statements. MCC has also undertaken a GI strategy and Local Nature Recovery Action Plan, which form part of the evidence base of the LPA’s GI Assessments.’</i>	Post Deposit	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants . The change addresses comments submitted by HBF (1255), Carney

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					Sweeney (1366), NRW (1412), Barwood Development (2463).
72	10.1.6	Amendment	Amend paragraph 10.1.6 to : <i>“Section 6 Duty and PPW12 emphasise that development proposals must take a proactive placemaking approach, delivering multifunctional green infrastructure (GI) and enhancing ecosystem resilience. Local Planning Authorities (LPAs) are required to demonstrate this through Green Infrastructure Assessments (GIAs).</i> <i>GIAs follow a step-by-step, evidence-based approach aligned with the DECCA framework, helping to inform both the design and implementation of development proposals. Detailed guidance on undertaking GIAs and applying this structured methodology is provided within PPW12, alongside Natural Resources Wales (NRW) Area Statements.</i> <i>To meet GIA requirements, Monmouthshire County Council (MCC) has prepared a Green Infrastructure Strategy and a Local Nature Recovery Action Plan. These documents form a key part of the LPA’s evidence base and support the delivery of robust and effective GI Assessments.”</i>	Post Submission	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicant. The change addresses comments submitted by HBF (1255), Carney Sweeney (1366), NRW (1412), Barwood Development (2463).
72-73	S5	Amendment	Amend Strategic Policy S5 – Green Infrastructure, Landscape and Nature Recovery to include reference to the Local Planning Authority and the addition of an ‘s’ in relation to reference to Green Infrastructure Assessments. The first paragraph of Strategic Policy S5 will read: <i>‘Development proposals will adopt a strategic and proactive placemaking approach. The Local Planning Authority’s evidence based Green Infrastructure Assessments and step wise approach will inform design and long-term delivery of a multifunctional landscape; capable of delivering a wide range of social, economic, environmental, health and well-being benefits for local communities and the County as a whole, including climate change action, net benefit for biodiversity and ecosystem resilience.’</i>	Post Deposit	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants . The change addresses comments submitted by HBF (1255), Carney

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					Sweeney (1366), NRW (1412), Barwood Development (2463).
74	GI1	Amendment	Replace reference to GI Assessments to GI Statement in Policy GI1 – Green Infrastructure and remove reference to ‘all major development proposals will be required to submit a GI Assessment’ from criterion a). The Policy will read: <i>‘Development proposals will be expected to maintain, protect and enhance the integrity and connectivity of Monmouthshire’s diverse GI network by:</i> <i>a) Undertaking an appropriate GI asset and opportunities statement and step wise approach based on the scale and complexity of development to inform development proposals.</i> <i>b) Ensuring that existing GI assets are protected, retained and integrated into new development. Where loss of GI is unavoidable, in order to secure sustainable development, appropriate mitigation and/or compensation of the lost assets will be required.</i> <i>c) Incorporating new and /or enhanced GI of an appropriate type, standard and size. Where on-site provision of GI is not possible, contributions will be sought to make appropriate provision for GI off-site.</i> <i>A GI statement must be provided with all planning applications. The statement will be proportionate to the scale, nature and complexity of the development proposed and will describe how GI has been incorporated into the proposal. The GI statement will need to demonstrate how a step wise approach as outlined in chapter 6 of PPW12 has been applied.’</i>	Post Deposit	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants . The change addresses comments submitted by HBF (1255), Carney Sweeney (1366).
74	10.2.5	Amendment	Delete paragraph 10.2.5 which states ‘ <i>In line with national policy all developments will be required to submit a GI assessment or GI statement, depending on the nature/scale of the development proposal.</i> ’	Post Deposit	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants . The change addresses comments

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					submitted by HBF (1255), Carney Sweeney (1366).
74	10.2.7	Amendment	Amend paragraph 10.2.7 to clarify the role the Local Planning Authority has in the preparation of Green Infrastructure Assessments. Paragraph 10.2.7 will read: <i>‘Development proposals should be informed by the GI priorities and principles identified in the LPA’s GI assessments, which include MCC’s GI Strategy, the South-East Wales Area Statement, Local Nature Recovery Action Plans, and MCC’s GI SPG. The GI SPG will provide further advice on GI implementation and methodology as well as the content and delivery of GI statements.’</i>	Post Deposit	Updated to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants. The change addresses comments submitted by HBF (1255), Carney Sweeney (1366).
76-77	10.3.2	Correction	Amend paragraph 10.3.2 to replace ‘Wye Valley National Designated Landscape Area of Outstanding Nature Beauty (AONB)’ to read ‘Wye Valley National Landscape (AONB)’.	Post Deposit	Factual correction raised by Wye Valley National Landscape (3588).
79	10.7.2	Amendment	Amend paragraph 10.7.2. to include reference to the Dyfodol Y Bannau, Bannau Brycheiniog National Park’s Management Plan. Paragraph 10.7.2. will read: <i>Although there are 12,000 hectares of National Park within the County, its planning is controlled by Bannau Brycheiniog National Park Authority. The current Management Plan, Dyfodol Y Bannau, for the BBNP 2023-2028 sets out future aspirations, protections and vision for the BBNP. Dyfodol Y Bannau sets out numerous themes, policies and priorities for managing change in the National Park. It is recognised that the BBNP provides an important backdrop to the Abergavenny area and wider landscape character of Monmouthshire protecting its setting from encroachment by inappropriate development.</i>	Post Deposit	Updated to reflect comments raised by Bannau Brycheiniog National Park (1061).

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
79	LC3	Amendment	Amend Policy LC3 to replace the word ‘preserve’ in criterion a) with ‘conserve’. Delete <i>‘Development that would cause unacceptable harm to the qualities that justify the designation of the Bannau Brycheiniog National Park or its setting will not be permitted’</i> and replace with <i>‘Development that would cause unacceptable harm to the Bannau Brycheiniog National Park or its setting will not be permitted.’</i> Policy LC3 – Bannau Brycheiniog National Park will read: <i>‘Development in the vicinity of the Bannau Brycheiniog National Park will only be permitted where it would:</i> <i>a) Conserve or enhance the landscape setting, as defined through the LANDMAP process.</i> <i>b) Have no serious adverse effect on significant views into and out of the National Park.</i> <i>c) Have no adverse impact on the International Dark Skies Reserve designation.</i> <i>Development that would cause unacceptable harm to the Bannau Brycheiniog National Park or its setting will not be permitted.’</i>	Post Deposit	Amended to reflect comments made by Bannau Brycheiniog National Park (1061).
82	10.10.8	Correction	Replace reference to ‘NR3’ in the final sentence of paragraph 10.10.8 with ‘NR2’.	Post Deposit	Factual correction
83	NR1	Amendment	Delete the second paragraph in Policy NR1 which states <i>‘Development proposals in sites containing protected species or habitats which are defined as irreplaceable by PPW12 are unacceptable.’</i>	Post Deposit	Amended to reflect comments made by Natural Resources Wales (1412).
84	10.11.1	Amendment	Replace the first sentence of paragraph 10.11.1, which reads ‘The Gwent Levels and Severn Estuary European Marine Site (EMS) are identified as a contiguous series of SSSI, SPA, Ramsar site, SAC and a Special Landscape of Historic Interest of Monmouthshire’s coastal area’ with: <i>‘Monmouthshire’s coastline is special given its varying designations including the Gwent Levels which are a contiguous series of SSSIs; the Severn Estuary European Marine Site, a term which encompasses all its international designations including SAC, SPA and Ramsar; and a Special Landscape of Historic Interest.’</i>	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) suggesting an alternative wording for clarity.
85	10.12.4	Amendment	Rewording of text in the paragraph as following: <i>‘Suitable Alternative Natural Greenspace (SANG) must be a key design consideration in the developments within 12.6km of the Severn Estuary with housing site allocation policies referring to provision. Financial contributions may also be required for Strategic Access Management and</i>	Post Submission	The Severn Estuary Mitigation Strategy was received post Deposit consultation, therefore the full

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			<i>Monitoring' (SAMM), where necessary. Supplementary Planning Guidance will provide further information on the mechanisms for delivery.'</i>		detail of the mitigation measures was not available at the time of writing. It is now apparent the SANG is to only be provided in relation to the HA2 strategic allocation and all the other allocations within a 12.6km radius of the Severn Estuary are to provide a financial contribution as part of Strategic Access Management and Monitoring (SAMM).
85-86	10.13.1	Amendment	Amend the final sentence of paragraph 10.13.1, which states 'and requires good water quality status for all water bodies' with 'and requires good overall status for all water bodies.' The sentence will read: <i>Full regard must be had to the Water Framework Directive (WFD) which sets out the requirements in relation to the water environment and requires good overall status for all water bodies.</i>	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) suggesting an alternative wording for clarity.
86	10.13.4	Correction	Delete the word 'programmed' in the last sentence of 10.13.4.	Post Deposit	Grammar
86-87	10.13.5	Amendment	Amend title from 'Phosphate Water Quality in Riverine Special Areas of Conservation (SAC)' to 'Nutrient Impacts on Water Quality in Riverine Special Areas of Conservation (SAC)'.	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to ensure all possible water quality attributes are reflected.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
86	10.13.6	Amendment	Amend the wording of paragraph 10.13.6. to replace the final sentence with: <i>'Development proposals need to ensure they would not result in an unacceptable impact of the water quality of our SAC rivers', with 'development proposals need to ensure no adverse effect on site integrity of our SAC rivers.'</i>	Post-Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to reflect the Habitats Regulations terminology.
87	10.13.8	Amendment	Amendment paragraph 10.13.8 to replace the final sentence that reads <i>'Development therefore that does not connect to the public sewer main network in SPZs will not be acceptable'</i> with: <i>'All sewage effluent discharges to ground must have an environmental permit and proposals will be considered based on a risk assessment and the appropriateness of the discharge with respect to the local environmental setting.'</i>	Post-Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to reflect NRW's policy regarding development in a Source Protection Zone (SPZ).
87	10.13.8	Amendment	Amend wording in paragraph 10.13.8 to insert 'In SPZ'. The paragraph will read: <i>'Inside SPZ1 all sewage effluent discharges to ground must have an environmental permit and proposals will be considered based on a risk assessment and the appropriateness of the discharge with respect to the local environmental setting.'</i>	Post Submission	Amended to reflect NRW's response in the SoCG.
86	10.13.5 – 10.13.7	Amendment	Delete sub-heading 'Phosphate Water Quality in Riverine Special Areas of Conservation (SAC)' and paragraphs 10.13.5 – 10.13.7 and replace with the following text: <i>Nutrient Impacts on Water Quality in Riverine Special Areas of Conservation (SAC)</i> <i>The impact of excess nutrients, including phosphates, has become a significant environmental challenge in riverine SACs across the country, including Wales. These rivers are designated for their high ecological value; however, many are failing to meet strict phosphorus targets designed to protect sensitive habitats and species.</i> <i>The Rivers Usk and Wye in Monmouthshire are designated as SACs and are, therefore, subject to strict protection under the Conservation of Habitats and Species Regulations 2017 which require any plan or project likely to have a significant effect on a European site to be subject to Habitats</i>	Post Submission	As a result of additional phosphates related work.

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			Regulations Assessment (HRA). The extent of the Usk and Wye River SAC catchments in Monmouthshire are illustrated in Map XX and the Constraints Map accompanying the RLDP. In January 2021, NRW published a report that presented the assessment of compliance against recently tightened phosphorus water quality targets for SAC rivers. The report indicated that over 60% of SAC water bodies were failing the new targets for phosphorus. More recent data does, however, indicate that water quality across the rivers in Monmouthshire has improved since 2021. The latest monitoring data for the River Usk catchment demonstrates that 54% of waterbodies in the catchment are meeting their phosphorus targets which is an improvement from 2021¹. Notwithstanding this, as of 2026 nutrient neutrality remains a requirement across the whole Usk catchment. 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. Ongoing actions to address phosphorus levels in the Usk catchment are expected to continually improve water quality in this waterbody throughout the RLDP period. The position will be kept under review. Whilst previously failing 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. The Council is required to ensure, through the RLDP and development management process, that development within the relevant catchments is nutrient neutral and will not result in adverse effects on the integrity of the European sites, either alone or in combination with other plans and projects. Development proposals within catchments must, therefore, demonstrate nutrient neutrality to ensure that there is no net increase in nutrient loading to the affected sites. Reflecting the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales², Policy NR3 makes clear that development proposals that are likely to result in a significant effect on		

¹ River Usk Nutrient Management Plan (April 2025)

² Including NRW advice [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#) and WG planning guidance [Clarification note: applying the tests of soundness to Local Development Plans \(LDPs\)](#) and [Planning Guidance - Development in SAC Rivers](#)

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			a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures. As such, planning permission may only be granted where the competent authority is able to conclude that there will be no likely adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. The policy provides a clear framework to ensure that development proposals with the potential to affect the integrity of European sites are assessed appropriately and consistently, in accordance with national legislation and guidance. It allows proposals to proceed where impacts can be avoided or adequately mitigated. Prior to considering mitigation pathways, current NRW guidance suggests that if the relevant Wastewater Treatment Works (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'. Further detail on this approach will be set out in SPG. Mitigation measures may be secured where necessary to ensure there is no adverse impact on the integrity of European sites. In accordance with Welsh Government and NRW guidance, mitigation may take a variety of forms, including on-site and off-site measures, contributions to strategic mitigation schemes or developer-led/project specific mitigation, provided that such measures are demonstrated to be effective and deliverable. Supplementary Planning Guidance (SPG) will be prepared to provide further clarification on the implementation of this policy. This will reflect the nutrient neutrality evidence base that has been prepared to inform the RLDP, including a Strategic Mitigation Options Report, Nutrient Mitigation Action Plan and Developer Mitigation Handbook. These documents identify and provide detail on the range of mitigation options available and their implementation, including consideration of threshold, integrated catchment improvements, strategic or developer-led nutrient neutrality approaches. As national guidance and requirements in relation to nutrient neutrality continue to evolve, the Developer Mitigation Handbook will be reviewed and updated periodically to reflect changes in nutrient mitigation requirements as and when required.		
86	10.13.5 – 10.13.7	Amendment	Delete sub-heading 'Phosphate Water Quality in Riverine Special Areas of Conservation (SAC)' to Policy NR3 and paragraphs 10.13.5 – 10.13.7 and replace with the following text:	Post Inspectors' Letter to the	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			Nutrient Impacts on Water Quality in Riverine Special Areas of Conservation (SAC) The impact of excess nutrients, including phosphates, has become a significant environmental challenge in riverine SACs across the country, including Wales. These rivers are designated for their high ecological value; however, many are failing to meet strict phosphorus targets designed to protect sensitive habitats and species. The Rivers Usk and Wye in Monmouthshire are designated as SACs and are, therefore, subject to strict protection under the Conservation of Habitats and Species Regulations 2017 which require any plan or project likely to have a significant effect on a European site to be subject to Habitats Regulations Assessment (HRA). The extent of the Usk and Wye River SAC catchments in Monmouthshire are illustrated in Map XX and the Constraints Map accompanying the RLDP. In January 2021, NRW published a report that presented the assessment of compliance against recently tightened phosphorus water quality targets for SAC rivers. The report indicated that over 60% of SAC water bodies were failing the new targets for phosphorus. More recent data does, however, indicate that water quality across the rivers in Monmouthshire has improved since 2021. The latest monitoring data for the River Usk catchment demonstrates that 54% of waterbodies in the catchment are meeting their phosphorus targets which is an improvement from 2021. Notwithstanding this, as of 2026 nutrient neutrality remains a requirement across the whole Usk catchment. 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. Ongoing actions to address phosphorus levels in the Usk catchment are expected to continually improve water quality in this waterbody throughout the RLDP period. The position will be kept under review. Whilst previously failing 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. The Council is required to ensure, through the RLDP and development management process, that development within the relevant catchments will not result in adverse effects on the integrity of the European sites, either alone or in combination with other plans and projects. Development proposals that generate excess phosphorus within these catchments must, in the absence of sufficient headroom created by the Review of Permits or where de minimis can be robustly	Council 17.06.2026 (ED22)	

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			evidenced, provide mitigation to demonstrate nutrient neutrality to ensure that there is no net increase in nutrient loading to the affected sites. Reflecting the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales, Policy NR3 makes clear that development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures. As such, planning permission may only be granted where the competent authority is able to conclude that there will be no likely adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. The policy provides a clear framework to ensure that development proposals with the potential to affect the integrity of European sites are assessed appropriately and consistently, in accordance with national legislation and guidance. It allows proposals to proceed where impacts can be avoided or adequately mitigated. Prior to considering mitigation pathways, current NRW guidance suggests that if the relevant Wastewater Treatment Works (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'. Further detail on this approach will be set out in SPG. Where it cannot be confirmed that a site is able to be 'screened out', for example due to location in a WwTW catchment that is yet to be upgraded, then mitigation measures may be secured where necessary to ensure there is no adverse impact on the integrity of European sites. In accordance with Welsh Government and NRW guidance, mitigation may take a variety of forms, including on-site and off-site measures (but upstream of the point of impact to the SAC), contributions to strategic mitigation schemes under the integrated approach or developer-led/project specific mitigation, provided that such measures are demonstrated to be effective, deliverable, and secured in perpetuity. To grant planning permission, the planning authority must be satisfied that appropriate measures to avoid deterioration of water quality and adverse effects on site integrity and the attainment of conservation objectives are secured. Evidence must demonstrate: • That any improvements necessary to avoid adverse effects on site integrity have been quantified;		

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			• That the actions required have been clearly identified and are supported by an appropriate delivery mechanism; • That there is a clear and deliverable timetable for implementation that will achieve the relevant conservation objectives and nutrient targets. Supplementary Planning Guidance (SPG) will be prepared to provide further clarification on the implementation of this policy. This will reflect the nutrient neutrality evidence base that has been prepared to inform the RLDP, including a Strategic Mitigation Options Report, Nutrient Mitigation Action Plan and the forthcoming Developer Mitigation Handbook. These documents identify and provide detail on the range of mitigation options available and their implementation, including consideration of threshold (de minimis) approaches, integrated catchment improvements, strategic or developer-led nutrient neutrality approaches. As national guidance and requirements in relation to nutrient neutrality continue to evolve, the Developer Mitigation Handbook will be reviewed and updated periodically to reflect changes in nutrient mitigation requirements as and when required.		
87	10.13.9	Amendment	Amend the wording in paragraph 10.13.9 from 'sustainable resource management' to 'NRW groundwater protection policy'. The final sentence of paragraph 10.13.9 will read: <i>'All development proposals within the SPZ must be able to demonstrate that the proposal complies with NRW's groundwater protection policy and that no contamination of the water supply will result from the development proposal.'</i>	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to reflect NRW's ground water protection policy.
87	NR3	Amendment	Add additional text to the end of Policy NR3—Protection of Water Sources and the Water Environment (shown in italics). Policy NR3 will read: Policy NR3—Protection of Water Sources and the Water Environment <i>Development, which may impact upon the water environment and associated land, will only be permitted where it:</i> <i>a) Would not harm or pose an unacceptable risk to the capacity or flow of ground water, surface water or coastal water systems;</i>	Post Submission	As a result of additional phosphates related work.

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			b) Would not harm or pose an unacceptable risk to the quality and quantity of ground waters, surface waters, wetlands or coastal water systems including, where appropriate, their ecological and amenity value; and c) Where practicable and reasonable, improves water quality. Development likely to result in a significant effect on a European site will only be permitted where the competent authority is satisfied, through a Habitats Regulations Assessment, that there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation.		
87	NR3	Amendment	Add updated text to Policy NR3 – Protection of Water Sources and the Water Environment (shown as underscored). Policy NR3 will read as follows: Policy NR3 – Protection of Water Sources and the Water Environment Development, which may impact upon the water environment and associated land, will only be permitted where it: a) Would not harm or pose an unacceptable risk to the capacity or flow of ground water, surface water or coastal water systems; b) Would not harm or pose an unacceptable risk to the quality and quantity of ground waters, surface waters, wetlands or coastal water systems including, where appropriate, their ecological and amenity value; and c) Where practicable and reasonable, improves water quality. <u>Notwithstanding the above, development likely to have a significant effect on a European Site, either alone or in combination with other plans or projects, will only be permitted where the competent authority is satisfied, through a Habitats Regulations Assessment, that there will be no adverse effect on site integrity and that the conservation objectives of the designated site can be met. This may be achieved through avoidance measures, wider restoration measures, strategic and/or project-specific mitigation, or a combination of such measures, where these are demonstrated to be effective, deliverable and sufficiently certain.</u> <u>Thus, within the hydrological catchment of the riverine SACs which are evidenced to be failing regarding nutrients, development proposals will only be permitted where it can be demonstrated that:</u> a) <u>They are not a source of additional phosphorus or other nutrient pollution; or</u>	Post Inspectors' Letter to the Council 17.06.2026 (ED22)	As a result of additional phosphates related work.

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			b) <u>Where they are a source of additional phosphorus or nutrient pollution, there is no pathway by which those nutrients can enter the SAC water body environment; or</u> c) <u>Measures associated with the proposed development are put in place that remove reasonable scientific doubt, in perpetuity and for the lifetime of the development, to enable a conclusion of no adverse effect on site integrity.</u> <u>For development creating wastewater discharges, planning permission will only be granted where it can be demonstrated that sufficient capacity exists within the environmental permit limits of the Wastewater Treatment Works serving the development, taking account of fair-share principles which may include the implementation of restoration measures within the relevant SAC catchment as part of a coordinated approach to improving river health. Where necessary, the phasing of development will be required to align with the delivery of wastewater infrastructure improvements.</u> <u>Where a fair-share approach cannot be demonstrated as secure, development proposals may be permitted where alternative mitigation measures are agreed with the Council and are demonstrated to be able to avoid adverse effects on site integrity. In such circumstances, support of the integrated approach, strategic or developer-led mitigation must achieve nutrient neutrality for the lifetime of the development.</u> <u>Where mitigation measures are required, applications must be accompanied by a Nutrient Mitigation Assessment demonstrating a mitigation strategy that is effective, deliverable, and legally secured in perpetuity where required, and provides reasonable scientific certainty that no adverse effect on site integrity will occur and that site conservation objectives can be met.</u>		
90	Links to Wider Policy Framework	Correction	Delete repetition of 'Green Infrastructure' in relation to the Green Infrastructure Strategy 2019.	Post Deposit	Grammar
90	Links to Wider Policy Framework	Correction	Delete the word 'Monmouthshire' from TAN5: Nature Conservation and Planning Monmouthshire.	Post Submission	Correction
90	Links to Wider Policy Framework	Amendment	Amend the Links to Wider Policy Framework with the addition of reference to the 'Dyfodol Y Bannau, Bannau Brycheiniog National Park's Management Plan – 2023-2029.'	Post Deposit	Amended to reflect comments made by Bannau Brycheiniog National Park (1061).

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Infrastructure					
93	11.2.2	Correction	Replace 'where it is required' with 'where planning permission is required' in paragraph 11.2.2. The paragraph will read: <i>While many forms of electronic and telecommunications infrastructure are supported by extensive permitted development rights, Policy IN1 seeks to support any telecommunications and broadband infrastructure where planning permission is required, while at the same time ensuring there are no environmental impacts or adverse impacts on residential amenity and/or the historic and natural environment.</i>	Post Deposit	Grammar
New Housing					
98	12.3.3	Amendment	Delete the last sentence of paragraph 12.3.3, which reads ' <i>As noted above connection to non-mains sewer will not be acceptable in an SPZ due to risk to groundwater pollution</i> ' and replace with: <i>'All proposals will therefore be considered against NRW's guidance relating to proposals within SPZs.'</i>	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to reflect NRW's policy regarding development in a Source Protection Zone (SPZ).
98	12.3.3	Amendment	Insert the following text after paragraph 12.3.3: <i>'New development within the settlement of Trellech must seek connection to the DCWW sewage works, instead of exploring non-mains options, which will likely require upgrading.'</i>	Post Deposit	Amended in response to comments made by Natural Resources Wales (NRW) (1412) to clarify Trellech's foul drainage constraints.
Affordable Housing					
106	13.1.10	Correction	The final sentence of paragraph 13.1.10 refers to 'paragraphs 12.1.12 – 12.1.13'. This should read 'paragraph 13.1.12'.	Post Deposit	Factual correction
107	S7	Correction	Add the words 'Strategic Policy' as a suffix to the policy title 'S7 – Affordable Housing'	Post Deposit	Formatting / Consistency

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
110	Links to Wider Policy Framework	Correction	Update the date of the Housing Background Paper to October 2025.	Post Deposit	Factual correction
106	13.1.3	Correction	Update the first sentence to 'The updated Local Housing Market Assessment Refresh 2022 – 2037 (LHMA) (February 2026) estimates a net need of 404 affordable homes per annum for the Monmouthshire planning administrative area (excluding the BBNP area) for the first five years of the LHMA period (2022 – 2027), with a further 90 homes per year for the remaining ten year period.	Post Submission	Factual correction to reflect ED13 Updated LHMA Refresh (February 2026).
106	Footnote 36	Correction	Update footnote 36 to note 'The updated LHMA refresh was formally signed off by Welsh Government in December 2025'.	Post Submission	Factual correction to reflect ED13 Updated LHMA Refresh (February 2026).
Residential Allocations					
111	Table HA1 – HA18	Correction	Amend reference to 'Land at Penlanlas' with 'Land at Penlanlas Farm'.	Post Deposit	Factual correction
113-114	S8	Amendment	Under the sub-heading Sustainable Communities, replace the third bullet point with the following text: <i>Dwellings built to net zero carbon standards, as set out in Policy NZ1.</i>	Post Deposit	Amended in response to comments raised in relation to consistency with Policy NZ1 – Monmouthshire Net Zero Carbon Homes, made by Richborough Estates (1633) and Barwood Development Securities (2463).
Policy HA1 – Land to the East of Abergavenny					
115	14.3.5	Amendment	Delete the following text from paragraph 14.3.5 ' <i>The site is also within the River Usk phosphorus sensitive catchment area.</i> ' and replace with the following: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>		
116	HA1	Amendment	Insert 'residential led' to criterion a) of HA1 – Land to the East of Abergavenny. Criterion a) will read: <i>a) To provide a residential-led, mixed use development containing the following key uses:</i>	Post Deposit	Amended in response to comments raised in relation to the accuracy of the development description by Monmouthshire Housing Association (1965).
117	HA1	Correction	Delete the second bullet point of criterion m), which reads ' <i>Emergency secondary access on to Garth Road</i> ' and replace with ' <i>the provision of a secondary access</i> '.	Post Deposit	Factual correction.
118	HA1	Amendment	Add sub-heading and criterion r) to policy HA1 – Land to the East of Abergavenny, to read as follows: <i>Protection of Water Quality</i> <i>r) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA2 – Land to the East of Caldicot/North of Portskewett					
121	HA2	Amendment	Amend the first bullet point of criterion a) of Policy HA2 with the addition of 'approximately'. The bullet point will read: <i>Approximately 770 homes including 50% affordable homes.</i>	Post Deposit	Amended for consistency with the wider HA2 policy in response to comments received from MCC Estates (1461) and Richborough Estates (1663).
122	HA2	Correction	Criterion l) – replace 'on to' with 'onto'.	Post Deposit	Grammar

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Policy HA3 – Land at Mounton Road, Chepstow					
125	14.5.1	Amendment	Amend the second sentence of paragraph 14.5.1 to reference Mounton Road as well as the A466 in relation to National Cycle Network (NCN4). The sentence will read: <i>Public Rights of Ways (PROWs) are located just outside the northern boundary of the site (off Mounton Road) and National Cycle Network 4 (NCN4) runs along the A466 and Mounton Road.</i>	Post Deposit	Amended in response to comments made by Barwood Development Securities (2463).
126	HA3	Amendment	Amend criterion k) and omit the second sentence 'Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary'.	Post Submission	Factual correction to accurately reflect the Severn Estuary Recreation Strategy (SD144).
Policy HA4 – Land at Leasbrook, Monmouth					
129	14.6.3	Amendment	Add the following text to paragraph 14.6.3: <i>The site is within the River Wye Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
130	HA4	Amendment	Criterion d) and e) of Policy HA4 will be amended to replace reference to the Juvenile Sustenance Zone with Core Sustenance Zone. They will read: d) <i>The proposal must be accompanied by a lighting scheme. Dark corridors should be maintained and light spillage on to wildlife corridors minimised, with particular regard to the Greater Horseshoe Bat Core Sustenance Zone and corridors used by bats.</i> e) <i>A S.106 agreement must be signed and include the requirement for additional woodland buffer planting with well-designed public access to be provided on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat Core Sustenance Zone and the wider landscape character due to the site's proximity to the Dixon Conservation Area and Lower Wye Valley Landscape of Historic Interest. This is required in addition to any on-site GI provision.</i>	Post Deposit	Amended in response to comments received from Gwent Wildlife Trust (1787).

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
130	HA4	Correction	Insert bullet points for the three sentences noted below criterion i) of Policy HA4 – Land at Leasbrook, Monmouth	Post Deposit	Formatting
131	HA4	Amendment	Add sub-heading and criterion k) to policy HA4 – Land at Leasbrook, Monmouth, to read as follows: <i>Protection of Water Quality</i> <i>k) The site is within the River Wye Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA5 – Land at Penlanlas Farm, Abergavenny					
133	14.7	Correction	Amend the title ‘Land at Penlanlas, Abergavenny’ to read ‘Land at Penlanlas Farm, Abergavenny’.	Post Deposit	Factual correction
133	14.7.1	Correction	Amend the first sentence of paragraph 14.7.1 that refers to ‘Land at Penlanlas, Abergavenny’ to read ‘Land at Penlanlas Farm, Abergavenny’.	Post Deposit	Factual correction
133	14.7.2	Amendment	Delete the following text from paragraph 14.7.2 ‘ <i>The site is also within the River Usk phosphorus sensitive catchment area.</i> ’ and replace with the following: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
133	HA5	Amendment	Add sub-heading and criterion i) to policy HA5 – Land at Penlanlas Farm, Abergavenny to read as follows: <i>Protection of Water Quality</i> <i>i) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA6 – Land at Rockfield Road, Monmouth					
134	14.8.2	Amendment	After paragraph 14.8.2 add the following text: <i>The site is within the River Wye Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>		
135	HA6	Amendment	Amend criterion b) of Policy HA6 to include reference to 'Core Sustenance Zone'. Criterion b) will read: <i>b) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, with particular reference to corridors and the Core Sustenance Zone used by horseshoe bats.</i>	Post Deposit	Amended in response to comments received from Gwent Wildlife Trust (1787).
135	HA6	Amendment	Add sub-heading and criterion f) to policy HA6 – Land at Rockfield Road, Monmouth, to read as follows: <i>Protection of Water Quality</i> <i>f) The site is within the River Wye Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA7 – Land at Drewen Farm, Monmouth					
136	14.9.2	Amendment	After paragraph 14.9.2 add the following text: <i>The site is within the River Wye Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
136	HA7	Amendment	Add sub-heading and criterion g) to policy HA7 – Land at Drewen Farm, Monmouth, to read as follows: <i>Protection of Water Quality</i> <i>g) The site is within the River Wye Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.

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Policy HA8 – Land at Tudor Road, Wyesham, Monmouth					
137	14.10.2	Amendment	After paragraph 14.10.2 add the following text: <i>The site is within the River Wye Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
138	HA8	Amendment	Amend criterion e) of Policy HA6 to include reference to 'Core Sustenance Zone'. Criterion e) will read: <i>e) Provision of a lighting strategy that considers and mitigates for visual impact on landscape character and setting and minimises light spillage on to wildlife corridors and habitats, including corridors and the Core Sustenance Zone used by bats.</i>	Post Deposit	Amended in response to comments received from Gwent Wildlife Trust (1787).
138	HA8	Amendment	Add sub-heading and criterion k) to policy HA8 – Land at Tudor Road, Monmouth, to read as follows: <i>Protection of Water Quality</i> <i>k) The site is within the River Wye Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA9 - Land at Former MOD, Caerwent					
140	HA9	Amendment	Amend criterion g) and omit the second sentence 'Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary'.	Post Submission	Factual correction to accurately reflect the Severn Estuary Recreation Strategy (SD144).
Policy HA10 – Land South of Monmouth Road, Raglan					
140	14.12.1	Amendment	Amend paragraph 14.12.1 to refer to 4.5ha instead of 7.6ha.	Post Deposit	Amended to address a drafting error noted by Richborough Estates (1663).

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140	14.12.1		After paragraph 14.12.1 add the following text: <i>The site is within the River Wye Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
141	HA10	Correction	Amend criterion e) of Policy HA10 – Land South of Monmouth Road, Raglan to replace reference to ‘include new planting of native species of local provenance’ with ‘ <i>including</i> new planting of native species of local provenance’.	Post Deposit	Grammar
141	HA10	Amendment	Add sub-heading and criterion h) to policy HA10 – Land South of Monmouth Road, Raglan to read as follows: <i>Protection of Water Quality</i> <i>i) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA11 – Land East of Burrium Gate, Usk					
141	14.13.1	Correction	Replace reference to 2.9ha in paragraph 14.13.1 to 2.6ha.	Post Deposit	Factual correction
141	14.13.3	Correction	Remove reference to the Usk AQMA in paragraph 14.13.3. The first sentence of this paragraph to read: <i>Key considerations with regard to the development of the site include its impact on overland drainage flow and its layout and design upon the setting of Usk.</i>	Post Submission	Factual correction
142	14.13.3	Amendment	Delete the following text from paragraph 14.13.3 ‘ <i>The site is also within the River Usk phosphorus sensitive catchment area.</i> ’ and replace with the following: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
142	HA11	Correction	Remove the hyphen between 'Land-east' in the title of Policy HA11 – Land east of Burrium Gate, Usk and capitalise the word 'East'.	Post Deposit	Grammar
142	HA11	Correction	Remove the words “ <i>within Usk’s AQMA</i> ” within Criterion e). To now read: <i>The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions. Development must not significantly worsen (either individually or cumulatively) any air pollution emissions in areas where pollution levels are close to their objective or limit value levels, nor result in a breach of an air quality objective or limit value.</i>	Post Submission	Factual correction
143	HA11	Amendment	Add sub-heading and criterion g) to policy HA11 – Land East of Burrium Gate, Usk to read as follows: <i>Protection of Water Quality</i> <i>g) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA12 – Land west of Trem yr Ysgol, Penperlleni					
143	14.14.4	Amendment	After paragraph 14.14.4 add the following text: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
143	HA12	Correction	Capitalise the word 'West' in the title of Policy HA12 – Land west of Trem yr Ysgol, Penperlleni and capitalise the word 'Yr'.	Post Deposit	Grammar
144	HA12	Amendment	Amend criterion d) to: <i>Provision of off-site highway infrastructure improvements as necessary, having regard to requirements arising from the Transport Assessment and including:</i> <i>An agreement to provide pedestrian and primary vehicular access from either Trem Yr Access or the A4042;</i> <i>Provision of a link through the site to allow for pedestrian access to the southbound bus stop.</i>	Post Submission	To reflect the change in position to consider two primary vehicular access options to the site.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
144	HA12	Amendment	Add sub-heading and criterion e) to policy HA12 – Land West of Trem Yr Ysgol, Penperlleni, to read as follows: <i>Protection of Water Quality</i> <i>e) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA13 – Land adjacent to Piercefield Public House St Arvans					
145	HA13	Amendment	Amend criterion b) and omit the second sentence ‘Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary’.	Post Submission	Factual correction to accurately reflect the Severn Estuary Recreation Strategy (SD144).
Policy HA14 – Land at Churchfields, Devauden					
145	14.16.1	Correction	Replace reference to 1.4ha in paragraph 14.16.1 to 1ha.	Post Deposit	Factual correction
145	14.16.2	Amendment	After paragraph 14.16.2 add the following text: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
146	HA14	Amendment	Amend criterion c) and omit the second sentence ‘Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary’.	Post Submission	Factual correction to accurately reflect the Severn Estuary Recreation Strategy (SD144).
146	HA14	Amendment	Add sub-heading and criterion f) to policy HA14 – Land at Churchfields, Devauden, to read as follows: <i>Protection of Water Quality</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>f) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>		
Policy HA15 – Land east of Little Mill					
147	14.17.2	Amendment	After paragraph 14.17.2 add the following text: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
147	HA15	Correction	Capitalise the word 'East' in the title of Policy HA15 – Land east of Little Mill	Post Deposit	Grammar
147	HA15	Amendment	Add sub-heading and criterion d) to policy HA15 – Land East of Little Mill, to read as follows: <i>Protection of Water Quality</i> <i>d) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
HA16 – Land North of Little Mill					
147	14.18.1	Amendment	After paragraph 14.18.1 add the following text: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
148	HA16	Amendment	Add sub-heading and criterion g) to policy HA16 – Land North of Little Mill, to read as follows: <i>Protection of Water Quality</i> <i>g) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
HA17 – Land adjacent to Llanellen Court, Llanellen					
148	14.19.1	Amendment	After paragraph 14.19.1 add the following text: <i>The site is within the River Usk Special Area of Conservation (SAC) catchment and therefore as set out in Policy NR3 - Protection of Water Sources and the Water Environment, the proposal will need to meet the requirements of the Habitats Regulations and nutrient neutrality guidance in Wales. Development proposals that are likely to result in a significant effect on a European site will be subject to an HRA to demonstrate there will be no adverse effect on site integrity, including where necessary through the provision of appropriate mitigation measures.</i>	Post Submission	As a result of additional phosphates related work.
149	HA17	Amendment	Add sub-heading and criterion c) to policy HA17 – Land adjacent to Llanellen Court Farm, Llanellen, to read as follows: <i>Protection of Water Quality</i> <i>c) The site is within the River Usk Special Area of Conservation catchment and will be required to meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.</i>	Post Submission	As a result of additional phosphates related work.
Policy HA18 – Land west of Redd Landes, Shirenewton					
150	HA18	Correction	Capitalise the word 'West' in the title of Policy HA18 – Land west of Redd Landes, Shirenewton	Post Deposit	Grammar
151	HA18	Amendment	Amend criterion c) and omit the second sentence <i>'Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the estuary'</i> .	Post Submission	Factual correction to accurately reflect the Severn Estuary Recreation Strategy (SD144).
Gypsy & Travellers					
152	15.1.2	Amendment	Amend the third sentence of paragraph 15.1.2 to read: <i>Planning approval for a further four pitches at Llancayo reduces the overall pitch requirement further to seven.</i>	Post Submission	Amended to reflect the granting of planning permission.
Employment & Economy					
158	16.3.1	Amendment	Amend reference to Policy S12 in paragraph 16.3.1 to Policy S10.	Post Deposit	Amended to address a drafting error noted by Abergavenny &

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					District Civic Society (1367).
158	16.3.1	Update	Amend reference to the period '2018 – 2024' in the final sentence of paragraph 16.3.1 to refer to 2018 – 2025 to reflect '2018 – 2025' to reflect an additional year of employment land monitoring.	Post Deposit	Factual correction
159	16.3.1	Update	Amend the Employment Land Supply table on page 159 to refer to 'Employment land Supply Take Up 2018 – 2025' to reflect an additional year of employment land monitoring.	Post Deposit	Factual correction
160	16.3.5	Correction	Include a new paragraph before paragraph 16.3.5 to reference that Site EA1e – Land Adjoining Oak Grove Farm, Caldicot is located within a Source Protection Zone. The following text is to be added: <i>Site EA1e – Land Adjoining Oak Grove Farm, Caldicot is located within a Source Protection Zone. All development proposals within the SPZ must be able to demonstrate that the proposal complies with NRW's groundwater protection policy and that no contamination of the water supply will result from the development proposal.</i>	Post Deposit	Factual correction
160	16.3.7	Amendment	Include a new paragraph after 16.3.7 to provide reference to employment allocation EA1b – Poultry Units, Rockfield, Monmouth, being within the 3km Core Sustenance Zone associated with the Greater Horseshoe Bat. The following text to be added: <i>A key consideration in relation to allocation EA1b – Poultry Units, Rockfield, Monmouth, is its location within the Core Sustenance Zone associated with the Greater Horseshoe bat. Particular regard should be given to light spillage on to wildlife corridors and corridors used by bats.</i>	Post Deposit	Amended in response to comments received from Gwent Wildlife Trust (1787).
163	16.6.1	Amendment	Remove reference to 'single-site users / specific large employers' from paragraph 16.6.1, which will read: <i>'Policy E2 below seeks to enable proposals for employment use on non-allocated sites by non-speculative employers that cannot be accommodated on existing or proposed business/industrial sites and sets out the criteria against which such proposals will be assessed.'</i>	Post Deposit	Amended to have regard to comments made by Abergavenny & District Civic Society (1367).
163	E2	Amendment	Remove reference to 'single-site' in Policy E2. The opening sentence of Policy E2 will read: <i>Proposals for industrial and business development (Use Classes B1, B2 and B8) by non-speculative users will be permitted provided that all the following conditions are met:</i>	Post Deposit	Amended to have regard to comments made by Abergavenny & District Civic Society (1367).
163	16.6.2	Amendment	Remove reference to 'specific large employers' from the second sentence of paragraph 16.6.2, which will read:	Post Deposit	Amended to have regard to comments

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			<i>'However, there may be instances where an employer cannot find a suitable site either on an existing or allocated industrial/business site, or within other local authority areas within the employer's area of search.'</i>		made by Abergavenny & District Civic Society (1367).
Rural Enterprise					
170	RE5	Amendment	Amend Policy RE5 with the addition of criterion e) <i>'there are no unacceptable cumulative impacts in combination with existing or consented development.'</i>	Post Deposit	Amended to address comments that the policy does not adequately reflect national guidance raised by the Countryside Protection for Rural Wales (CPRW) (1001) and Jill Cantor (3749).
Visitor Economy					
175	T1	Correction	Delete the full stop at the end of criterion e).	Post Deposit	Grammar
Sustainable Transport					
186	ST3	Correction	Move hyphen in title bar of Policy ST3 – Freight to after 'ST3'.	Post Deposit	Grammar
187	19.8.1	Correction	Delete the final sentence of paragraph 19.8.1 to remove the following <i>'Where known, the safeguarded routes are shown on the Proposals Map.'</i>	Post Deposit	Correction
188		Correction	Amend criterion o) from typo 'B2425' to 'B4245'	Post Submission	Correction
Retail & Commercial Centres					
193-194	RC2	Correction	Amend Policy RC2 – Primary Shopping Frontages to correct the numbering of the Primary Shopping Frontages (PSF) as follows: PSF4 to read PSF3 PSF5 to read PSF4 PSF6 to read PSF5 PSF7 to read PSF6	Post Deposit	Correction

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			PSF8 to read PSF7		
198	Links to Wider Policy Framework	Correction	Update date of the Retail Background Paper – January 2024 to Retail Background Paper 2025.	Post Deposit	Factual correction.
Community Infrastructure					
200	21.1.3	Correction	Amended to correct inconsistencies with the application of upper-case letters in the bullet list that accompanies paragraph 21.1.3.	Post Deposit	Grammar
201	21.2.1	Correction	Replace reference to Policy CRF1 in the final sentence of paragraph 21.2.1 with reference to ‘Policy CI1’.	Post Deposit	Factual correction
201	CI1	Amendment	Amend Policy CI1 – Retention of Existing Community Facilities to include reference to ‘ <i>cultural facilities</i> ’. The first sentence of Policy CI1 will read: <i>‘The change of use or conversion of neighbourhood or village shops, halls, public houses, cultural facilities and other community facilities to other uses will only be permitted where all of the following criteria are met:’</i>	Post Deposit	Amended to include reference to cultural facilities following comments made by Theatres Trust (1002).
202	21.3.2	Amendment	Amend wording in paragraph 21.3.2 from ‘playing fields, outdoor sport courts and children’s play areas’ to ‘outdoor sports and play space’. The second sentence of paragraph 21.3.2 will read: <i>This sets out the Fields in Trust (FIT) standard, which is categorised into; formal spaces such as outdoor sports and play space; and informal spaces, such as parks, communal green spaces and infrastructure, woodland and scrubland areas.</i>	Post Deposit	Amended to reflect the updated Fields in Trust Standards raised in comments made by Redrow Homes (1503).
202	21.3.3	Amendment	Amend wording in paragraph 21.3.3 to remove reference to ‘ <i>The FIT standard sets out the median level of provision for allotments, community gardens and urban farms in Wales as 0.3 hectares per 1000 population. The Council will use this standard for such provision</i> ’ and replace with: <i>‘There is a corporate objective to increase allotment provision and community food growing, as set out in the Council’s Corporate and Community Plan (2022-2028) and the Council’s Local Food Strategy (2024) and, therefore, it is considered appropriate to strive for new provision of 0.3 ha per 1,000 population, as part of Policy CI2.’</i>	Post Deposit	Amended to reflect the updated Fields in Trust Standards raised in comments made by Redrow Homes (1503).
202	CI2	Amendment	Update the standards set out in Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas with a new table based on the updated Fields in Trust Standards published in November 2024.	Post Deposit	Amended to reflect the updated Fields in Trust Standards raised

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason																						
			Policy CI2 – Provision of Formal and Informal Open Space and Allotments / Community Growing Areas New development proposals will be assessed against the Council’s standards for formal outdoor space, informal outdoor space, allotments and community growing, as set out below: <table><thead><tr><th></th><th>Open Space Typology</th><th>Quantity Guideline (hectares per 1,000 population)</th><th>Definition</th></tr></thead><tbody><tr><td colspan="4">FORMAL PUBLIC SPACE</td></tr><tr><td rowspan="3">Outdoor Sports</td><td>Sports Pitches</td><td>1.20 ha</td><td>Sports pitches including football rugby, hockey, cricket lacrosse, and American football</td></tr><tr><td>Courts and Greens, Tracks and Trails.</td><td>0.40ha</td><td>Courts and greens comprising natural or artificial surfaces, including tennis, netball, basketball, padel ball, volleyball, and bowling greens. Tracks and trails including athletics, graded mountain biking, canoeing, open water swimming and outdoor gym trails.</td></tr><tr><td>Subtotal</td><td>1.60 ha</td><td></td></tr><tr><td>Play Space</td><td>Equipped Designated Play Spaces</td><td>0.25ha</td><td>Local Area of Play (LAPs) and Locally Equipped Areas of Play (LEAPs) aimed at</td></tr></tbody></table>		Open Space Typology	Quantity Guideline (hectares per 1,000 population)	Definition	FORMAL PUBLIC SPACE				Outdoor Sports	Sports Pitches	1.20 ha	Sports pitches including football rugby, hockey, cricket lacrosse, and American football	Courts and Greens, Tracks and Trails.	0.40ha	Courts and greens comprising natural or artificial surfaces, including tennis, netball, basketball, padel ball, volleyball, and bowling greens. Tracks and trails including athletics, graded mountain biking, canoeing, open water swimming and outdoor gym trails.	Subtotal	1.60 ha		Play Space	Equipped Designated Play Spaces	0.25ha	Local Area of Play (LAPs) and Locally Equipped Areas of Play (LEAPs) aimed at		in comments made by Redrow Homes (1503).
	Open Space Typology	Quantity Guideline (hectares per 1,000 population)	Definition																								
FORMAL PUBLIC SPACE																											
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	Subtotal	1.60 ha																									
Play Space	Equipped Designated Play Spaces	0.25ha	Local Area of Play (LAPs) and Locally Equipped Areas of Play (LEAPs) aimed at																								

Page	Paragraph, Table or Policy	Type of Change	Details of Change				Stage	Reason
						children who can play independently, as well as Neighbourhood Equipped Areas of Play (NEAPs).		
				Other Play Provision	0.30ha	All weather multi-use games areas (MUGAs) including skateboard parks and pump tracks.		
				Subtotal	0.55ha			
			INFORMAL PUBLIC SPACE					
			Open Space	Parks and Gardens	0.80ha	Urban parks and squares, country parks, regional parks, forest parks, and formal gardens.		
				Amenity Greenspace	0.60ha	Informal recreation spaces, communal green spaces in and around housing, village greens, urban commons, and other incidental places which may include areas of hard spaces as well as green spaces.		
				Natural and Semi-natural	1.80 ha	Woodland, scrub, grassland, heath or moor, wetlands, open and running water and open access land.		
				Subtotal	3.20ha			
				Total	5.35ha			

Page	Paragraph, Table or Policy	Type of Change	Details of Change				Stage	Reason				
			<table><tr><td rowspan="2">ALLOTMENTS & COMMUNITY GROWING PROVISION</td><td rowspan="2">Allotments & Community Growing</td><td rowspan="2">0.3ha</td><td rowspan="2">Allotments, community gardens and community orchards.</td></tr><tr></tr></table>				ALLOTMENTS & COMMUNITY GROWING PROVISION	Allotments & Community Growing	0.3ha	Allotments, community gardens and community orchards.		
ALLOTMENTS & COMMUNITY GROWING PROVISION	Allotments & Community Growing	0.3ha	Allotments, community gardens and community orchards.									
204	21.3.4 – 21.3.6	Correction	Replace reference to ‘Open Space Audit’ to ‘Open Space Study’ in paragraphs 21.3.4 – 21.3.6.				Post Deposit	Factual correction				
204	21.3.8	Amendment	Replace the final sentence of paragraph 21.3.8 which reads ‘ <i>Recreational facilities should not be included within areas of SUDS.</i> ’ With: <i>Formal open space uses, such as sports pitches and equipped play areas should not be included within areas of SuDs.’</i>				Post Deposit	Amended to add further clarification in response to comments received by the Home Builders Federation (1255).				
205	CI3	Correction	Delete reference to the second ‘Policy’ in the policy heading.				Post Deposit	Grammar				
207	Links to Wider Policy Framework	Correction	Delete reference to Fields in Trust: Guidance for outdoor sport and play: Beyond to six acre standard (2017) and replace with Fields in Trust Standards – November 2024.				Post Deposit	Factual correction				
Minerals												
210	22.3.2	Amendment	Delete ‘In most instances’ from the start of paragraph 22.3.2. The first sentence of paragraph 22.3.2 will read: <i>Development may proceed within safeguarding areas as long as developers demonstrate the resource in question is either of poor quality/quantity and would not be economical to exploit, or the nature of the development in question would not prejudice exploitation of the resource.</i>				Post Deposit	Amended in response to comments made by the Minerals Products Association (1819).				
212	Links to Wider Policy Framework	Correction	Replace ‘October 2024’ in relation to the Minerals Background Paper with ‘October 2025’.				Post Deposit	Factual correction				

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Waste					
217	23.4.3	Amendment	Amend paragraph 23.4.3 to reference that Site W3f – Land Adjoining Oak Grove Farm, Caldicot is within a Source Protection Zone. The first sentence of paragraph 24.4.3 will read: <i>Site W3f – Land Adjoining Oak Grove Farm, Caldicot is located within a Source Protection Zone and site W3g – Five Lanes, Caerwent lies within the Great Spring Source Protection Zone and on a limestone principal aquifer.</i>	Post Deposit	Amended in response to comments made by Brian Williams (1646).
217	23.4.3	Correction	Replace the third sentence of paragraph 23.4.3 to delete reference to the flood risk zone associated with the Development Advice Maps which have been replaced by the Flood Maps for Planning. Replace the third sentence of paragraph 23.4.3 with the following: <i>Existing Waste Site W3h Llanfoist Civic Transfer Station lies within Flood Zone 2 Rivers on the Flood Map for Planning.</i>	Post Deposit	Updated to reflect the publication of TAN15 and the Flood Maps for Planning.
Monitoring and Review					
219	Monitoring & Review	Correction	Insert new chapter numbering to the Monitoring and Reviewing Chapter.	Post Deposit	Formatting
222	S4 Monitoring Indicators	Correction	Replace the indicator, target and trigger for further investigation in relation to the amount of development permitted in a flood risk area with the following: <i>Indicator: Key Indicator: Amount of development not satisfying TAN 15 requirements.</i> <i>Target: No applications permitted not satisfying TAN 15 requirements.</i> <i>Trigger for Further Investigation: 1 or more applications permitted not satisfying TAN 15 requirements.</i> <i>Source Data / Monitoring Method: Planning application database.</i>	Post Deposit	Updated to reflect the publication of TAN15 in March 2025.
Appendix 1 – RLDP Supporting Documents					
236 - 242	Appendix 1	Update	Appendix amended to reflect additions and updates to the RLDP evidence base.	Post Deposit	Amended to reflect additions and updates

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					to the RLDP evidence base.
Appendix 4 – Legislative and Policy Context					
254	Appendix 4	Correction	Replace '(LTP)' in the text accompanying the Monmouthshire Local Transport Strategy to refer to '(LTS)'.	Post Deposit	Correction
Appendix 5 – Regional Collaboration and Linkages with Neighbouring Local Authorities					
256	Appendix 5	Correction	Delete reference to 'Table x' in the third paragraph on page 256.	Post Deposit	Correction
256	Appendix 5	Correction	Delete last line on page 256 which reads: 'Table 1 sets out the regional collaboration work which has been undertaken and, where appropriate, has informed the RLDP process to date.'	Post Deposit	Amended to reflect that the table would need regular review/updating and reflect comments received from BBNP (1061).
256	Appendix 5	Amendment	Replace reference to 10 LPAs in the fourth paragraph of Appendix 5 to read 11 LPAs.	Post Deposit	Amended to reflect comments received from BBNP (1061).
257	Appendix 5	Amendment	Delete Table 1 of Appendix 5. Renummer Table 2, on Page 262, to become Table 1. Change reference to Table 2 on page 262 penultimate paragraph to refer to Table 1.	Post Deposit	Amended to reflect that the table would need regular review/updating and reflect comments received from BBNP (1061).
Appendix 6 – RLDP Issues					
269	Appendix 6	Correction	Amend the font style associated with point H(iii) on page 269 to reflect the rest of the table.	Post Deposit	Formatting
Appendix 7 – Housing Supply Components					
275-276	Appendix 7	Update	Updated figures to reflect consequential changes to the housing supply components following the 2024/25 housing monitoring period.	Post Deposit	Updated to reflect consequential

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason																					
					changes as a result of the 2024/25 housing monitoring period.																					
275 – 276	Appendix 7	Update	Updated figures to reflect consequential changes to the housing supply components following the 2025/26 housing monitoring period. The table will read: <table><thead><tr><th>Housing Supply Component</th><th>Number of Homes</th><th>Notes</th></tr></thead><tbody><tr><td>Housing Provision</td><td>6,210</td><td>RLDP Housing Requirement – 5,400 +15% flexibility allowance. Please note that due to a further monitoring update to reflect the 2025/26 monitoring period, the housing provision figure provided for 6,229.</td></tr><tr><td colspan="3">Less Commitments</td></tr><tr><td>2018 – 26</td><td>2,705</td><td>Comprises 2,045 homes on large sites and 494 homes on small sites.</td></tr><tr><td>Existing Land Supply Commitments</td><td>591</td><td>Sites have only been included if construction is already underway or they have planning permission as at 01/04/2026 and they are expected to come forward during the Plan period.</td></tr><tr><td colspan="3">Less Allowances</td></tr><tr><td>Windfall Allowance (>10)</td><td>180</td><td>The windfall allowance is based on the number of homes estimated to be achievable on sites included in the plan.</td></tr></tbody></table>	Housing Supply Component	Number of Homes	Notes	Housing Provision	6,210	RLDP Housing Requirement – 5,400 +15% flexibility allowance. Please note that due to a further monitoring update to reflect the 2025/26 monitoring period, the housing provision figure provided for 6,229.	Less Commitments			2018 – 26	2,705	Comprises 2,045 homes on large sites and 494 homes on small sites.	Existing Land Supply Commitments	591	Sites have only been included if construction is already underway or they have planning permission as at 01/04/2026 and they are expected to come forward during the Plan period.	Less Allowances			Windfall Allowance (>10)	180	The windfall allowance is based on the number of homes estimated to be achievable on sites included in the plan.	Post Submission	Updated to reflect consequential changes as a result of the 2024/25 housing monitoring period.
Housing Supply Component	Number of Homes	Notes																								
Housing Provision	6,210	RLDP Housing Requirement – 5,400 +15% flexibility allowance. Please note that due to a further monitoring update to reflect the 2025/26 monitoring period, the housing provision figure provided for 6,229.																								
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Less Allowances																										
Windfall Allowance (>10)	180	The windfall allowance is based on the number of homes estimated to be achievable on sites included in the plan.																								

Page	Paragraph, Table or Policy	Type of Change	Details of Change			Stage	Reason
					within the Housing Potential Study. An allowance of 180 homes is included. Windfall completions for the first 8 years of the plan are included within the overall completions (2018-2026). Windfalls with current permissions are included in the existing commitments. To avoid double counting the first 5 years of the remaining plan period are excluded from the calculations (2026-2031)		
			Small Site Allowance (<10)	448	A 15% reduction has been applied to the 10-year average for the remaining Plan period to reflect considerations including a reduction in the trend in recent years, fewer infill/conversion opportunities and the impact phosphate mitigation measures have had on planning applications.		
			Allocations				
			LDP Rollover Allocations	175	Rollover Allocations are Adopted LDP sites where there is evidence to demonstrate deliverability. Three sites make up the 'rollover' allocations component.		
			New Allocations	2,130	New allocations identified in the RLDP.		
			Total Allocations Provision	2,305	Rollover Allocations and New RLDP Allocations.		

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Appendix 8 – Infrastructure Delivery Plan					
277-371	Appendix 8	Correction	Appendix updated to correct missing apostrophes in the GI and Recreation and Open Space sections of the table. For example, Council's and children's.	Post Deposit	Grammar
277 – 371	Appendix 8	Correction	Amend the Phasing Tranche for each site to reflect the updated housing trajectory (April 2026).	Post Submission	Updated to reflect the 2025/26 housing monitoring period.
277-371	Appendix 8	Amendment	Amend reference from phosphate to phosphorus	Post Submission	In response to NRW's comment in the SoCG.
277-371	Appendix 8: IDP	Amendment	Amend the Infrastructure Delivery Plan table in relation to the following allocations to note the changes set out below: - HA1 – Land to the East of Abergavenny - HA4 – Land at Leasbrook, Monmouth - HA5 – Land at Penlanlas Farm, Abergavenny - HA6 – Land at Rockfield Road - HA7 – Land at Drewen Farm, Monmouth - HA8 – Land at Tudor Road, Monmouth - HA10 – Land South of Monmouth Road, Raglan - HA11 – Land East of Burrium Gate, Usk - HA12 – Land West of Trem Yr Ysgol, Penperlleni - HA14 – Land at Churchfields, Devauden - HA15 – Land East of Little Mill - HA16 – Land North of Little Mill - HA17 – Land adjacent to Llanellen Court Farm, Llanellen Key Policy Requirements: add the following bullet point '<i>Meet the requirements of Policy NR3 – Protection of Water Sources and the Water Environment.</i>' Sewerage Supply / Sewerage: In relation to phosphate mitigation add the following text to the relevant columns: Costs: <i>TBC in Supplementary Planning Guidance</i> Funding Sources: <i>Developer; grant funding</i> Delivery Body: <i>MCC</i>	Post Submission	As a result of additional phosphates related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			Phasing: <i>TBC</i> Notes: <i>The consideration of whether mitigation is necessary for the proposed development will be determined at the planning application stage and may include a financial contribution towards strategic mitigation measures such as constructed wetlands. Approximate costs, where required, will be set out in SPG and supporting Nutrient Mitigation Action Plan.</i>		
277-371	Appendix 8: IDP	Amendment	Amend the Infrastructure Delivery Plan table in relation to the following allocations to note the changes set out below: - HA1 – Land to the East of Abergavenny - HA4 – Land at Leasbrook, Monmouth - HA5 – Land at Penlanlas Farm, Abergavenny - HA6 – Land at Rockfield Road - HA7 – Land at Drewen Farm, Monmouth - HA8 – Land at Tudor Road, Monmouth Key Policy Requirements: add the following bullet point ‘Meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.’ Sewerage Supply / Sewerage: In relation to phosphate mitigation add the following text to the relevant columns: Costs: TBC in Supplementary Planning Guidance Funding Sources: Developer; grant funding Delivery Body: MCC Phasing: TBC Notes: Include the additional text as follows shown in italics: ‘...The development will need to satisfy the requirements of Policy NR3 - Protection of Water Sources and the Water Environment. The impact of development on water quality be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW. <i>The consideration of whether mitigation is necessary for the proposed development will be determined at the planning application stage and may include a financial contribution towards strategic mitigation measures such as constructed wetlands. Approximate costs, where required, will be set out in SPG and supporting Nutrient Mitigation Action Plan.</i>	Post Inspectors’ Letter to the Council 17.06.2026 (ED22)	As a result of additional phosphorus related work.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
277-371	Appendix 8: IDP	Amendment	Amend the Infrastructure Delivery Plan table in relation to the following allocations to note the changes set out below: - HA10 – Land South of Monmouth Road, Raglan - HA11 – Land East of Burrium Gate, Usk - HA12 – Land west of Trem Yr Ysgol, Penperlleni - HA15 – Land East of Little Mill - HA16 – Land North of Little Mill - HA17 – Land adjacent to Llanellen Court Farm, Llanellen Key Policy Requirements: add the following bullet point ‘Meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.’ Sewerage Supply / Sewerage: In relation to phosphate mitigation add the following text to the relevant columns: Costs: TBC in Supplementary Planning Guidance Funding Sources: Developer; grant funding Delivery Body: MCC Phasing: TBC Notes: Delete the following text and replace with the updated text shown in italics: ‘From a phosphorus perspective, NRW have completed the Environmental Permit review process and this proposal would be accommodated within the existing capacity of the permit.’ <i>‘The development will need to satisfy the requirements of Policy NR3 - Protection of Water Sources and the Water Environment. The impact of development on water quality be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.</i> <i>The consideration of whether mitigation is necessary for the proposed development will be determined at the planning application stage and may include a financial contribution towards strategic mitigation measures such as constructed wetlands. Approximate costs, where required, will be set out in SPG and supporting Nutrient Mitigation Action Plan.’</i>	Post Inspectors’ Letter to the Council 17.06.2026 (ED22)	As a result of additional phosphorus related work.
277-371	Appendix 8: IDP	Amendment	Amend the Infrastructure Delivery Plan table in relation to the allocation at Land at Churchfields, Devauden (HA14) to note the changes set out below:	Post Inspectors’ Letter to	As a result of additional

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
			Key Policy Requirements: add the following bullet point ‘Meet the requirements of Policy NR3 - Protection of Water Sources and the Water Environment.’ Sewerage Supply / Sewerage: In relation to phosphate mitigation add the following text to the relevant columns: Costs: TBC in Supplementary Planning Guidance Funding Sources: Developer; grant funding Delivery Body: MCC Phasing: TBC Notes: Delete the following text and replace with the updated text shown in italics: ‘From a phosphorus perspective a scheme to ensure the proposal can be accommodated within the existing capacity of the permit must be undertaken. Development cannot be consented until a detailed scheme showing compliance with the environmental permit has been agreed with NRW and DCWW.’ <i>‘The development will need to satisfy the requirements of Policy NR3 - Protection of Water Sources and the Water Environment. The impact of development on water quality be scrutinised as part of the planning application in consultation with relevant bodies including NRW and DCWW to ensure no adverse impacts to the river SAC. Any development proposal will need to be in accordance with the Environmental Permit issued by NRW.</i> <i>The consideration of whether mitigation is necessary for the proposed development will be determined at the planning application stage and may include a financial contribution towards strategic mitigation measures such as constructed wetlands. Approximate costs, where required, will be set out in SPG and supporting Nutrient Mitigation Action Plan.’</i>	the Council 17.06.2026 (ED22)	phosphorus related work.
278 / 279	Appendix 8 Policy HA1	Amendment	Highways and Sustainable Travel section: Remove reference to ‘Garth Road’ within the context of the emergency secondary access. Bullet point to read: <i>Off-site highway infrastructure improvements as necessary including, accesses and a junction onto the A465 and the provision of a secondary access.</i>	Post Submission	To ensure consistency with amendments made to Policy HA1.
299	Appendix 8 Policy HA4	Amendment	The reference in the Table, in relation to Wye Valley & Forest of Dean Bat Sites, is required to be amended to replace reference to the Juvenile Sustenance Zone with Core Sustenance Zone in both the first and sixth column.	Post Submission	To ensure consistency with SD16 Schedule of Minor Changes to the Deposit RLDP in relation to Policy HA4.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
306	Appendix 8	Amendment	Update the 'Notes' column in relation to Water Supply/Sewerage section of Policy HA5 – Land at Penlanlas Farm, Abergavenny in Appendix 8 – Infrastructure Delivery Plan to reflect the need for a Hydraulic Modelling Assessment to determine the point of connection to the water network. Include additional paragraph after the first paragraph to read: <i>Hydraulic Modelling Assessment required to determine the point of connection to the water network.</i>	Post Deposit	Amended to reflect comments received from Dŵr Cymru Welsh Water (1024) clarifying infrastructure requirements.
311	Appendix 8 - HA6	Amendment	Update the 'Notes' column in relation to Water Supply/Sewerage section of Policy HA6 – Land at Rockfield Road, Monmouth in Appendix 8 – Infrastructure Delivery to reflect the need for a Hydraulic Modelling Assessment to determine the point of connection to the water network. Include additional paragraph after the first paragraph to read: <i>Hydraulic Modelling Assessment required to determine the point of connection to the water network.</i>	Post Deposit	Amended to reflect comments received from Dŵr Cymru Welsh Water (1024) clarifying infrastructure requirements.
316	Appendix 8 – HA7	Amendment	Remove reference to Hydraulic Modelling Assessment being required for the public sewerage network within Water Supply/Sewerage section.	Post Submission	Factual correction
334	Appendix 8 - HA11	Correction	Remove the first bullet point relating to the Usk AQMA from 'Key site issues and constraints'. Bullet points to read: • The site's impact on overland drainage flow. • Site is located within the River Usk phosphorus catchment area.	Post Submission	Factual correction
350	Appendix 8 – HA14	Correction	Amend the first sentence in the 'Notes' column in relation to Education – Primary and Secondary Schools of Policy HA14 – Land at Churchfields, Devauden in Appendix 8 to read 'Education suggests there are capacity issues in some year groups in the catchment primary school so may need to attend alternative schools in the cluster but quantum of children not sufficient to increase capacity and therefore no contribution currently required. MCC Education suggests there is currently capacity in secondary schools in the locality'.	Post Deposit	Correction
353	Appendix 8 – HA14	Amendment	Add in a new row to the table relating to the Severn Estuary European Marine Site. The site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.	Post Submission	Factual correction to ensure consistency with SD144 Severn Estuary Recreation Mitigation Strategy.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
359	Appendix 8 – HA16	Correction	Amend the title of the table to read ‘HA16 – Land north of Little Mill’ and insert a heading box for the site.	Post Deposit	Correction
371	Appendix 8 – HA18	Amendment	Update the ‘Notes’ column in relation to Water Supply/Sewerage section of Policy HA18 – Land west of Redd Landes, Shirenewton in Appendix 8 – Infrastructure Delivery Plan to reflect the need for a Hydraulic Modelling Assessment to determine the point of connection to the water network. Include additional paragraph after the first paragraph to read: <i>Hydraulic Modelling Assessment required to determine the point of connection to the water network.</i>	Post Deposit	Amended to reflect comments received from Dŵr Cymru Welsh Water (1024) clarifying infrastructure requirements.
Appendix 9 – Housing Trajectory					
372 377	Appendix 9	Correction	Replace Table 1: The Timing and Phasing of Allocations (2018-2033), Table 2: The Timing and Phasing of Sites with Planning Permission (2028-2033), Table 3: Anticipated Annual Build Rate Calculation and Figure 1: Housing Development Trajectory 2018 – 2033 with updated figures to reflect representations noted below and consequential changes as a result of the 2024/25 housing monitoring period.	Post Deposit	Updated to reflect the 2024/25 housing monitoring period.
372 – 377	Appendix 9	Correction	Replace Table 1: The Timing and Phasing of Allocations (2018-2033), Table 2: The Timing and Phasing of Sites with Planning Permission (2028-2033), Table 3: Anticipated Annual Build Rate Calculation and Figure 1: Housing Development Trajectory 2018 – 2033 with updated figures to reflect changes as a result of the 2025/26 housing monitoring period.	Post Submission	Updated to reflect the 2025/26 housing monitoring period.
372	Appendix 9	Amendment	Update the Housing Trajectory (Table 1: The Timing and Phasing of Allocations (2018-2033)) in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates: 130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.	Post Deposit	Amended in response to comments received from Barratt David Wilson Homes (1281), Melin Homes (1301), Vistry Homes Limited (1493), Richborough Estates (1663), Llanarth Estates (1683), Tirion Homes (2951), Candleston Homes (2952) and Sero Homes (2954).

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
372	Appendix 9	Amendment	Update the Housing Trajectory (Table 1: The Timing and Phasing of Allocations (2018-2033)) in relation to HA14 – Land at Churchfields, Devauden with following delivery rates: 10 units in 2028/29 and 10 units in 2029/30.	Post Deposit	Amended in response to comments received from Monmouthshire Housing Association (1305) and in response to an updated position in relation to Devauden Wastewater Treatment Works.
Appendix 10: Employment Land Schedule					
378	Appendix 10	Amendment	Amend the phasing for the following sites: - EA1d – Newhouse Farm (South of M48), Chepstow 2.5ha into the long-term phasing tranche (28/29 – 32/33) - EA1e – Land adjoining Oak Grove Farm, Caldicot – 6ha into the long-term phasing tranche (28/29 – 32/33) - EA1h – Gwent Euro Park, Magor – 7ha into the long-term phasing tranche (28/29 – 32/33) - EA1i – Raglan Enterprise Park, Raglan – 1.5ha into the long-term phasing tranche (28/29 – 32/33)	Post Submission	Updated to reflect current position with site allocations.
Appendix 11: Supplementary Planning Guidance					
379	Appendix 11	Amendment	Add ‘Protection of Water Quality in Riverine Special Areas of Conservation (SAC)’ to the list of Supplementary Planning Guidance noted in Appendix 11, with a timescale of ‘ <i>within 12 months of adoption</i> ’.	Post Submission	As a result of additional phosphates related work.
Appendix 12: Glossary of Terms					
380 – 384	Appendix 12	Amendment	Include the following definition of exemplar development in the glossary to provide clarity: ‘ <i>Exemplar development relates to development of a high standard. It relates to more than just good design, it considers social, economic, environmental and cultural aspects as well as physical appearance.</i> ’	Post Deposit	Amended in response to representations made in relation to the ambiguity of the term ‘exemplar’ in the RLDP Vision and objectives by Carney Sweeney Ltd (1366),

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					Barwood Development Securities Ltd (2463) and Shirenewton Community Council (2548)
380-384	Appendix 12	Amendment	Include the following definition of the terms Green Infrastructure Assessment in the glossary to provide clarity: <i>‘Green Infrastructure (GI) Assessments: Green Infrastructure (GI) Assessments include up-to-date inventories and maps of existing GI and ecological assets and networks prepared by the Council. The assessments include MCC’s GI Strategy, MCC’s GI Supplementary Planning Guidance and Local Nature Recovery Action Plans (NRAPs).’</i>	Post Deposit	Update to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants . The change addresses comments submitted by HBF (1255), Carney Sweeney (1366), NRW (1412), Barwood Development (2463).
380-384	Appendix 12	Amendment	Include the following definition of the terms Green Infrastructure Statements in the glossary to provide clarity: <i>‘Green Infrastructure (GI) Statement: Green Infrastructure Statements are to be prepared by developers/applicants to support their development proposals as set out in Policy GI1 – Green Infrastructure. The statement will be proportionate to the scale, nature and complexity of the development proposed.’</i>	Post Deposit	Update to reflect representations noting the incorrect interpretation Planning Policy Wales and use of the term GI Assessments, which is a duty placed on the Council to undertake not developers/applicants

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					. The change addresses comments submitted by HBF (1255), Carney Sweeney (1366), NRW (1412), Barwood Development (2463).
380-384	Appendix 12	Amendment	Include the following definition of the term nutrients in the glossary to provide clarity: 'Captures all possible water quality attributes which SAC rivers are assessed against, including phosphates.'	Post Deposit	Added in response to representation from NRW regarding the use of the term nutrients.
Proposals Map					
N/A	Proposals Map	Correction	Amend the Llanover settlement boundary to correct a drafting error.	Post Deposit	Correction
N/A	Proposals Map	Correction	Amend the settlement boundary in the vicinity of Rockfield Grove, Undy to correct a drafting error.	Post Deposit	Correction
N/A	Proposals Map	Amendment	Remove Open Space designations from the Proposals Map and Inset Maps.	Post Deposit	Amended to simplify the Proposals Map. Open Space designations are identified within the Open Space Study, which is a 'live' document. This approach allows changes to be made as necessary.
N/A	Proposals Map	Correction	Include Overmonnow Neighbourhood Centre onto the Proposals Map.	Post Deposit	Correction
N/A	Proposals Map	Correction	Include the Central Shopping and Commercial Area boundary for Magor onto the Proposals Map.	Post Deposit	Correction

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
Constraints Map					
N/A	Constraints Map	Amendment	Delete the Usk Air Quality Area from the Constraints map as this will be revoked by the end of June 2026.	Post Submission	Factual Update
N/A	Constraints Map	Amendment	Update to include the River Usk and River Wye Phosphorus Catchment Areas.	Post Submission	Factual Update
Integrated Sustainability Assessment – Deposit Plan – September 2024					
105	8.12.24	Amendment	Update reference in paragraph 8.12.24 of the Integrated Sustainability Assessment to delete reference to the ‘BBNP Management Plan’ and replace with ‘Dyfodol Y Bannau: The Future (The Management Plan for Bannau Brycheiniog National Park 2023-2028)’.	Post Deposit	Amended in response to comments received from the BBNP (1061).
N/A	N/A	Correction	Update ‘Brecon Beacons National Park’ references to ‘Bannau Brycheiniog National Park’, as relevant.	Post Deposit	Factual correction
N/A	N/A	Correction	Technical Annex Candidate Sites Assessment: Updated to reflect drafting errors related to GIS assessment. Update ‘Brecon Beacons National Park’ references to ‘Bannau Brycheiniog National Park’, as relevant.	Post Deposit	Factual correction
Habitats Regulations Assessment – Deposit Plan – September 2024					
N/A	N/A	Addendum	Preparation of an Addendum to the Deposit Plan Habitats Regulation Assessment.	Post Deposit	Prepared in response to comments received from NRW (1412).
N/A	N/A	Addendum	Preparation of an Addendum to the Deposit Plan Habitats Regulation Assessment.	Post Submission	Prepared in response to the additional nutrient evidence (see Phosphate Position Paper, April 2026) (ED15c)
Background Papers / Evidence Base					
N/A	Housing Background Paper	Update	Housing Background Paper: Updated to take account of the 2024/25 housing monitoring period.	Post Deposit	Updated to reflect consequential changes as a result of

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
					the 2024/25 housing monitoring period.
N/A	Housing Background Paper	Update	Housing Background Paper: Updated to take account of the 2025/26 housing monitoring period.	Post Submission	Updated to reflect consequential changes as a result of the 2025/26 housing monitoring period.
N/A	Minerals Background Paper	Update	Minerals Background Paper: Updated to take account of comments submitted by the Minerals Products Association (MPA) and the reflect updates in the Former Gwent Sub-Region (Monmouthshire County Council, Blaenau Gwent County Borough Council and Newport City Council and Torfaen County Borough Council) with regards to minerals applications and candidate sites.	Post Deposit	Updated in response to comments received from MPA (1819) and to reflect the latest position in the LPAs making up the Former Gwent Sub-Region.
N/A	Candidate Site Assessment Report	Correction	Candidate Site Assessment Report: Updated to reflect drafting errors.	Post Deposit	Correction
N/A	Open Space Study	Update	Open Space Study: Update following the publication of the Fields in Trust (FIT) Standards in November 2024.	Post Deposit	Updated to respond to the publication of the FIT Standards in November 2024.
N/A	Areas of Amenity Importance Review	Correction	Areas of Amenity Importance Review: updated to reflect drafting errors.	Post Deposit	Correction
N/A	Settlement Boundary Review	Correction	Settlement Boundary Review: Updated to reflect drafting errors.	Post Deposit	Correction
N/A	Settlement Boundary Review Page 17	Correction	Include comment regarding point 56 (as shown on the Magor with Undy map): <i>“Adjust boundary to follow appropriate boundary lines and to include residential curtilages where appropriate. Adjust label on map to clearly indicate the location of adjustments.”</i>	Post Submission	Details missed from table in original report.

Page	Paragraph, Table or Policy	Type of Change	Details of Change	Stage	Reason
N/A	Infrastructure Delivery Plan Background Paper (SD104)	Amendment	Update the Infrastructure Delivery Plan Background Paper (SD104) to reflect the changes proposed to the RLDP policy framework as a result of the additional phosphate evidence.	Post Submission	Update to reflect the additional phosphate evidence.
19	Infrastructure Delivery Plan Background Paper (SD104)	Amendment	Paragraph 3.57: remove reference to Caerwent Depot and replace with Land at former MOD, Caerwent.	Post Submission	Factual correction
24	Infrastructure Delivery Plan Background Paper (SD104)	Amendment	Highways and Sustainable Travel section: Remove reference to 'Garth Road' within the context of the emergency secondary access. Bullet point to read: <i>Off-site highway infrastructure improvements as necessary including, accesses and a junction onto the A465 and the provision of a secondary access.</i>	Post Submission	To ensure consistency with amendments made to Policy HA1.
41	Infrastructure Delivery Plan Background Paper (SD104)	Amendment	The reference in the Table, in relation to Wye Valley & Forest of Dean Bat Sites, is required to be amended to replace reference to the Juvenile Sustenance Zone with Core Sustenance Zone in both the first and sixth column.	Post Submission	To ensure consistency with SD16 Schedule of Minor Changes to the Deposit RLDP in relation to Policy HA4.
56	Infrastructure Delivery Plan Background Paper (SD104)	Amendment	Remove reference to Hydraulic Modelling Assessment being required for the public sewerage network within the Water Supply/Sewerage section.	Post Submission	Factual correction
87	Infrastructure Delivery Plan Background	Amendment	Add in a new row to the table relating to the Severn Estuary European Marine Site. The site is located in the 12.6km core recreational catchment zone for the Severn Estuary European Marine Site, a financial contribution may be required as part of the mitigation strategy for the protected site to reduce recreational pressure on the features of the Estuary.	Post Submission	Factual correction to ensure consistency with SD144 Severn Estuary Recreation Mitigation Strategy.

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	Paper (SD104)				
Candidate Site Proformas					
4	CS0251	Amendment	Remove reference to The Showground, Caldicot and replace with Land at Bradbury Farm, Crick	Post Submission	Factual correction
8	CS0258	Amendment	Allocation reference should be EA1f (not EA1h) and proposed uses B1/B2/B8	Post Submission	Factual correction