



monmouthshire
sir fynwy

Monmouthshire County Council
County Hall, The Rhadyr, Usk,
NP15 1GA
Cyngor Sir Fynwy
Neuadd y Sir, Y Rhadyr,
Brunbuga, NP15 1GA

Tel/Ffôn: 01633 644429
E-Mail/Ebost: planningpolicy@monmouthshire.gov.uk
Web/Gwefan: www.monmouthshire.gov.uk
Our Ref/Ein Cyf: RLDP Examination
Your Ref./Eich Cyf:
Date/Dyddiad: 15th December 2025

Dear Ms de-Courcey and Ms MacFarlane,

Monmouthshire Replacement Local Development Plan – Initial Questions

Thank you for your letter setting out the additional information required by Monmouthshire County Council (MCC) to address the issue of the effect of proposed development on riverine Special Areas of Conservation (SACs).

While preparing the Replacement Local Development Plan (RLDP), the Council has worked closely with Dŵr Cymru Welsh Water (DCWW) and Natural Resources Wales (NRW) to implement major upgrades that enable phosphate stripping at two key wastewater treatment works in the County: Monmouth and Abergavenny (Llanfoist). The Council follows the latest NRW guidance, making use of available capacity within environmental permits and applying the 'fair share approach,' especially considering the significant phosphate contributions from other sources like agriculture. These upgrades have already greatly reduced phosphate levels entering riverine SACs from the existing population and will further lower phosphate discharge resulting from the limited affordable housing-focused growth planned under the RLDP.

The Council has proactively engaged with various organisations, including NRW and DCWW, to address the concerns outlined in your correspondence. Consultants are currently being appointed to support the preparation of the additional work that has been requested. In response to these discussions, a comprehensive work programme has been developed, detailing the scope of work, key tasks, and the target dates for the completion and submission of new or updated documents, as set out in Appendix 1 to this letter. While certain elements of the required work can be concluded by 23 February 2026, it will not be feasible for MCC to submit all necessary information by this date due to the breadth of the work needed to fully address the issues raised. Notably, the programme includes critical stages related to evaluating phosphate loads resulting from proposed developments in the RLDP, alongside consideration of potential mitigation strategies and viability assessments.

Given the proposed timelines, the Council respectfully requests that the examination proceeds concurrently with the completion of additional work required to address your initial questions concerning the riverine SACs. This approach would facilitate continued progress in reviewing other elements of the RLDP and help avoid significant delays to the examination process.

The Council acknowledges the risks associated with progressing the examination while the requested information is still being prepared. Nevertheless, following discussions with NRW, DCWW, and an external consultant, it has been deemed feasible to develop and supply the necessary data to demonstrate that the high-level strategic proposals in the RLDP are unlikely to have a significantly adverse effect on water quality within the two riverine SAC areas. Consequently, it is considered appropriate for other aspects of the examination to proceed concurrently.

Could PEDW please confirm their agreement to proceed with the examination based on the agreement of the attached work programme? If any further details are needed that are not highlighted within the work programme, please specify when convenient.

Yours sincerely,

Andrew Jones
Head of Planning/Pennaeth Cynllunio