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Our Ref/Ein Cyf: RLDP Examination
Your Ref:/Eich Cyf:
Date/Dyddiad: 16th January 2026

Dear Ms de-Courcey and Ms MacFarlane,

Monmouthshire Replacement Local Development Plan – Initial Questions Work Programme Update

Further to previous correspondence dated 15th December 2025, this letter provides an update on the Council's work programme to date to address the Inspectors' initial questions regarding the issue of the effect of proposed development on riverine Special Areas of Conservation (SACs). The full work programme, including progress updates, is appended to this letter.

The Council is continuing to proactively engage with various organisations, including NRW, Welsh Government Planning Division and DCWW, to address the matters raised. In addition, AECOM has been formally appointed to support the preparation of the additional work that has been requested, with an inception meeting held on 7th January 2026 to confirm/agree the scope of works and timescales. Fortnightly progress meetings have been scheduled to ensure the project is delivered in accordance with agreed timescales. The initial stage of the work has commenced – this involves budget calculations, using the latest calculator provided by the Welsh Government which will assist in determining the residual phosphate load of the proposed RLDP allocations in the affected catchments. The budget calculations are expected to be completed by the end of January 2026, the findings of which will inform the next stage of the work programme – investigation of high-level mitigation options to offset any residual phosphates associated with the proposed RLDP allocations. The Council has also commenced the preparation of a position statement on the matters raised. A further update on the work programme will be provided w/c 9th February 2026.

Further to previous correspondence noting that the examination will proceed following the end of the current suspension period (i.e. 23rd February 2026), would it be possible to provide an indication of likely dates for the hearing sessions to enable the Council to manage resources, including internal officers and consultants, and annual leave commitments.

Yours sincerely,

Andrew Jones
Head of Planning/Pennaeth Cynllunio

Work Programme: Approach, Methodology and Progress

Task	Timescale	Progress to Date
1 Inception and progress meetings with consultant	Commence January 2026	Inception meeting held 07.01.2026. Fortnightly progress meetings scheduled.
2 Budget calculations and increased capacity generated by WwTW improvements Budget calculations will be undertaken using the latest calculator provided by the Welsh Government, which covers both the River Usk and River Wye catchments, in order to give confidence that the quantum of development proposed in any allocated or committed sites in areas where nutrient neutrality restrictions apply can reasonably be developed, and whether any additional mitigation is needed above that provided through the tightening of phosphorous permit limits at some WwTW. In accordance with the Inspectors' requests, the results will be presented as follows: • Forecast increases in volumes of phosphorus (P) each year of the RLDP in each SAC catchment by making reasonable assumptions for units/floorspace, phasing, build out and occupancy. • Overall total loads for development in both the River Usk and River Wye catchments for each year of the RLDP. • The name of the relevant WwTW, current or future proposed permit limits and how any identified phosphorous capacity relates to the nutrient neutrality requirements for the catchment the WwTW serves (i.e. is there capacity released that permits all development to come forward as planned in the RLDP or are there potential phasing issues or need for additional mitigation at any time or location).	Complete end January 2026	Budget calculations work commenced January 2026. Complete by end of January 2026.
3 Investigation of high-level mitigation options Where it is identified that additional phosphorous loadings would arise (despite WwTW improvements) due to developments in the RLDP, additional mitigation will be needed to offset the increase. Consideration will be given at a high level to the range of alternative and additional mitigation measures that may be considered in order to make all proposed development nutrient neutral. This will include some worked examples of how any residual excess	Complete by 23 rd February 2026	

Task	Timescale	Progress to Date
phosphorous (by RLDP year and catchment) could be mitigated. At this stage it would not be development/site specific but would provide an indication as to what scale of mitigation might be needed and approximate costs. The potential relevance of employment site allocations to contribute a nutrient load to the SAC sites will be considered, together with consideration of the recent judgement of <i>CG Fry & Sons Ltd v SSHCLG</i> [2025] UKSC 35 which relates to committed developments.		
4 Reflecting the outcomes of the above tasks, update the following as necessary: • Infrastructure Delivery Plan. • RLDP policy framework. Review relevant Deposit RLDP policies, identify any amendments required and, if necessary, prepare a schedule of proposed changes to the RLDP. • High level viability assessment to account for any additional mitigation that is required. • HRA – consult with NRW on any proposed updates.	Complete by end April 2026	
5 Explanatory/Background Paper and High-level Mitigation Action Plan Preparation of an explanatory/background paper to draw together the findings of the above tasks and clarify the Council’s position regarding the matters raised. Preparation of a mitigation action plan (setting out high level mitigation options to be agreed at the Development Management Stage).	Complete by end April 2026	