

MONMOUTHSHIRE
REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

FURTHER QUESTIONS

Important Notes:

- The purpose of the examination is to determine whether the Monmouthshire Replacement Local Development Plan 2018-2033 (LDP) is sound in accordance with the Development Plan Manual, Edition 3, 2020 (the Manual). **To be sound the Plan must meet the tests set out in the Manual. These are: (1) Does the plan fit? (is it clear that the LDP is consistent with other plans), (2) Is the plan appropriate? (is the plan appropriate for the area in the light of the evidence), and (3) Will the plan deliver? (is it likely to be effective).**
- In addition, the LDP must have been prepared in compliance with legal and regulatory procedural requirements.
- Following the submission of additional information during the Examination, and statements in response to the 'Matters, Issues and Questions' schedule (May 2026), the Inspectors have identified further questions to be addressed in advance of the Hearings commencing on 8 September 2026.
- The aim of these questions is to clarify the Inspectors' understanding of selected matters. You do not need to submit a response to these questions; your original representation and any other written submission(s) will be taken into account. Any response should not repeat evidence already before the Examination.
- **Participants should only respond to the questions below which directly relate to their previously submitted written representations on the Deposit LDP. Responses which go beyond the scope of these previous representations will be returned and will not be considered by the Inspectors.**
- Please clearly indicate in your statement(s) the question(s) that you are answering. **Responses which do not address the questions listed will be returned and will not be considered by the Inspectors.**
- Further statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per matter.
- Statements must be received electronically by the Programme Officer by **12 noon on Friday 14 August 2026**. Late submissions are unlikely to be accepted. Any statements that are of excessive length or contain irrelevant or repetitious material may be returned.
- We are examining the Deposit LDP as submitted by the County Council. Therefore, we will not, at this stage, be considering the merits for development of sites not included in the plan ('Candidate Sites').

- If you have questions in respect of this document or any aspect of the examination please contact the Programme Officer, Helen Wilson, by email at helen@programmeofficers.co.uk, or telephone on 01432 639547 / 07879 443035.

Hearing Session 1: Plan Preparation & Plan Strategy

1. Is the reference in the vision to 'affordable housing-led' accurate given the relative percentages of market housing and affordable housing proposed?
2. Should the vision and/or objective 10 refer to market housing as well as affordable housing?
3. Is the reference to 'exemplar' in the vision and objectives 10 and 11 necessary and appropriate? Given the Council's proposed inclusion in the Plan's glossary (Appendix 12), should this instead refer to development of a 'high standard'?
4. Given the significance of tourism to the local economy and the matters identified in issue 9 (Appendix 6 to the Plan), is the reference in objective 16 sufficient to address this issue?
5. Several of the indicators within the RLDP monitoring framework do not have targets and triggers identified. As paragraph 8.5 of the Development Plans Manual [NRPG2] states that all indicators must have a corresponding target, is this an appropriate approach?
6. Have the reasonable alternatives in relation to sites been sufficiently assessed and their selection/non-selection for allocation when compared to other sites been adequately explained in the Integrated Sustainability Appraisal [SD28]?

Phosphorus impacts on riverine Special Areas of Conservation (SAC):

7. The Council's Hearing Statement M1/1 refers to the evolving nature of an integrated approach to nutrient management. Until such time as an integrated approach is established, is there sufficient detail in the submitted evidence to demonstrate the deliverability of mitigation options to achieve nutrient neutrality, given the lifetime costs/timescales of strategic solutions are not fully known or the likely scale of developer contributions identified?
8. Bannau Brycheiniog National Park Authority's Hearing Statement M1/2 paragraphs 5-7 poses questions to the Council regarding the potential constructed wetland. How does the Council respond to these points?
9. Is reliance on the future production of Supplementary Planning Guidance (SPG) and Developers Mitigation Handbook (DMH) to provide further detail sufficient in reaching a conclusion that a policy framework exists to prevent adverse effects on the integrity of the affected SACs, whilst ensuring site delivery?
10. How will delivery of the Nutrient Mitigation Action Plan be ensured? Should additional indicators be included in the Plan's monitoring framework relating

to the production of SPG/DMH and delivery of dwellings in the affected catchments?

11. What weight should be given to Welsh Government's Position Statement [ED21] and its suggested approach for Monmouthshire in determining the soundness of the Plan?

Hearing Session 2: Plan Strategy

12. To what extent has the previous Welsh Government objection to growth levels determined the growth levels set in Strategic Policy S1, and is this an appropriate approach?
13. If a higher level of growth were to be pursued, would the Plan be in general conformity with Future Wales?
14. Should the 'policy on' adjustments used in deriving the Plan's housing and employment growth levels be applied to the 2022-based population and household projections? If not, why?
15. Given the remaining lifetime of the Plan, is the flexibility allowance of 15% sufficient? On what basis would a higher percentage be justified?
16. Should a deduction for non-delivery be applied to windfall sites? How has the 15% deduction to the infill allowance been selected?
17. On what basis have the timescales within the housing trajectory (Hearing Statement M2/1c) for securing planning permission and discharge of conditions been made? Are these realistic?
18. Does the Council's response at paragraph 4.2 of SOCG9 regarding highways and air quality impacts from planned growth in Forest of Dean District Council area sufficiently demonstrate how the cross-boundary issues are to be addressed?
19. Does the under-delivery of the current adopted LDP undermine confidence in the ability of the RLDP to deliver the growth intended?

Hearing Session 3: Plan Strategy

Please note that, at this session, there will be no consideration of individual housing or employment allocations or how the range of policies under consideration might apply to them. Such sites will be considered at Hearing Sessions 9 - 12 inclusive as applicable.

As set out in all iterations of the Hearings Programme "Hearing Sessions to discuss Alternative Sites will only be held if the Inspectors consider it necessary to do so. If they are considered necessary, in due course, separate notice will be given as to when such sessions will be convened." Accordingly, there will be no discussion of Candidate Sites during this session.

20. In its Hearing Statement Matter 3: Plan Strategy (M3/1), at pages 2 & 3, the Council responded to the Inspectors' question 20 a) in respect of how new windfall development within each tier of the settlement hierarchy will be assessed and managed. Over and above what has already been submitted in evidence, is this a logical and reasonable answer?
21. Whilst noting the submitted Statement of Common Ground between the Council and Forest of Dean District Council (SOCG9), in devising the Settlement Hierarchy, what consideration was given to the potential cumulative impact of the quantum of new housing proposed in Chepstow in conjunction with development pressure in the neighbouring district? What implications might the neighbouring Council's Revised Draft LDP have in this respect?
22. In its Deposit RLDP Consultation Report Appendix 12 - Volume 2 RLDP Strategic Framework (SD34), at page 201, the Council addressed the representation that a proportion of growth was taken from Severnside and directed to Monmouth in the October 2023 report (due to phosphate constraint resolved) without making up the reduction in the Severnside area. Over and above what has already been submitted in evidence, is this a logical and reasonable explanation for the proposed spatial distribution?
23. In paragraphs 21.1 – 21.5 inclusive of its Hearing Statement (M3/1) the Council has addressed the Inspectors' question about Welsh Government's representation that was subject of question 21 in the published Matters, Issues and Questions (ED16c). If this evidence is not considered to be persuasive, please explain why and highlight any perceived deficiencies.
24. The Council has addressed the Inspectors' questions about the scale of loss of Best and Most Versatile Agricultural Land in paragraphs 22.1 – 22.5 inclusive of its Hearing Statement (M3/1). If this evidence is not considered to be persuasive, please explain why and highlight any perceived deficiencies.
25. Over and above proposed amendments, corrections and updates to Policy S2 that the Council initially submitted for examination (SD16), in its Deposit RLDP Schedule of Proposed Changes (June 2026) [HS M3/1] it proposes that further updates be made, see pages 7 – 9 inclusive. If there is any objection to the proposed updates, please specify why.
26. In accordance with paragraph 3.64 of PPW12 where has the requisite 'demonstrable need' for the green wedge between Abergavenny, Llanfoist and the BBNP boundary, proposed by Policy GW1, been set out in evidence; where has evidence of the alleged 'development pressure' prompting this proposal been provided; and is the evidence base in this respect persuasive that 'alternative policy mechanisms' would not be sufficiently robust in protecting the urban form?
27. In respect of the part of the aforementioned green wedge, shown as parcel AG8 on Figure 6 of the Green Wedge Review: RLDP Green Wedge Designations (2025) [SD 155], has the Council demonstrated, in accordance in paragraph 3.71 of PPW12, why normal planning and development management policies would not provide the necessary protection; and does

- the aforementioned part of that proposed green wedge need to be removed to ensure this component of the Plan is soundly based?
28. In its Deposit RLDP Consultation Report Appendix 12 - Volume 2 RLDP Strategic Framework (SD34), at pages 269 and 270, the Council responded to concerns about the aforementioned proposed green wedge boundary. Over and above what has already been submitted in evidence, is this a logical and reasonable explanation for the proposed designation?
 29. In its Deposit RLDP Consultation Report Appendix 12 - Volume 2 RLDP Strategic Framework (SD34), at page 265, the Council addressed the representation that the current Chepstow/ Pwllmeyric/Mathern Green Wedge should be retained rather than subject of Policy GW1 be introduced. Over and above what has already been submitted in evidence, is this a logical and reasonable explanation for the proposed designation?
 30. How does the Council respond to the contention that the evidence supporting the spatial strategy does not appear to demonstrate that the implications of the proposed settlement expansion of Monmouth for the Wye Valley National Landscape have been properly tested? What account was taken of the setting, views, and Special Qualities of the National Landscape in its evidence base for Policy GW1? Has proper account been taken of the Monmouth Landscape Sensitivity Study (SD119)?
 31. Has proper regard been had to the provisions of Section 85 of the Countryside and Rights of Way (CRoW) Act 2000 and paragraph 6.3.8 of PPW12 in respect of the Wye Valley National Landscape?
 32. How does the Council respond to the contention that the Plan's evidence base does not adequately demonstrate that the Wye Valley National Landscape has been considered on an equivalent basis to the Bannau Brycheiniog National Park?
 33. The Council has suggested corrections to paragraphs 8.3.2, 8.5.3 and 8.5.4, and an amendment to footnote 31 in its Deposit RLDP Schedule of Proposed Changes (June 2026) [HS M3/1], page 13. If there is any objection to the proposed updates, and amendment please specify why.

Hearing Session 4: Housing & Community Infrastructure

Please note that, at this session, there will be no consideration of individual housing allocations or how the range of policies under consideration might apply to them. Such sites will be considered at Hearing Sessions 9-12 inclusive as applicable.

34. Representors have challenged Policy H1 in respect of the proposed settlement boundary for Abergavenny (including Llanfoist) but have not specified how the Plan should be changed to address their concerns; would they submit an annotated map or plan showing the revision(s) that they seek?

35. The Council has suggested 2 amendments to the explanatory text to Policy H2 in paragraph 12.2.3 – see (M4/1b) at page 26. If it is considered that these amendments are not acceptable, please explain why.
36. In respect of the perceived tension between Policies S2 and H3, in its Report of Consultation: Appendix 12 - Volume 7 – New Housing (SD39), at page 36, the Council explained why it considered that there was no need to change the wording of Policy H3 in response to those concerns. Is this a logical and reasonable explanation? If not, how precisely should the wording of Policy H3 be changed to address stated concerns?
37. Representors have suggested that Policy H8 allow for the final mix of house types, tenure and size to respond to site-specific circumstances. To this end: how precisely should the policy be re-worded; and how should either or both the policy or explanatory text provide clarity as to when that policy caveat would be engaged and how it would be applied?
38. The Council addressed the provisions of paragraph 12.10.5 of the Plan in its Report of Consultation: Appendix 12 - Volume 7 – New Housing (SD39), at page 35. It is noted that the paragraph contains the words 'priority' and 'predominantly' and does not suggest a moratorium on the provision of homes with 4 or more bedrooms. Accordingly, are concerns about perceived over-prescriptiveness and lack of flexibility well-founded?
39. In respect of Policy S8 and the representations that 'must' should be substituted with 'should', the Council addressed the issue in its Report of Consultation: Appendix 12 - Volume 9a – Residential Allocations (SD41), at page 5. It also set out in its Hearing Statement (M4/1), at page 1, as to why it considers Policy S8 to be locally distinct. In response, is there anything that representors want to add on this specific point?
40. Taking account of what is said the first sentence of paragraph 1.2.12 of the RDLP, is the 3rd bullet point of Policy S8 necessary? What does it add to the Plan when read as a whole?
41. The Council has suggested amendments and corrections to Community Infrastructure policies and associated explanatory text – see (M4/1b) at pages 40 - 43 inclusive. If it is considered that these amendments and/or corrections are not acceptable, please explain why.

Hearing Session 5: Affordable Housing & Gypsy and Traveller Accommodation

Affordable Housing

42. The Council's Hearing Statement M5/1 notes at paragraph 49.1 that a number of amendments were required to the previously submitted Local Housing Market Assessment (LHMA) [SD85] to '*ensure full alignment with national guidance and expectations*', resulting in the February 2026 LHMA Refresh [ED13]. Other than the amendments proposed to LDP paragraph 13.1.3, what are the amendments to the LHMA and the reason for each?

43. Are the findings of the February 2026 LHMA Refresh [ED13] accurate given the more recent publication of 2022-based population and household projections, and 2025-based estimates of additional housing need?
44. Paragraph 49.7 of M5/1 refers to the mix and tenure of homes to be agreed at the planning application stage, and the Council's tenure-neutral approach to affordable housing. Does this align with the assumptions in the Preliminary Viability Report and Addendum [SD86 and SD87] of 70% social rent and 30% low-cost home ownership tenure? What are the implications from the recognition in paragraph 5.1 of the Revised Approach to Affordable Housing Transfer Values [SD84] that this approach may need to be reviewed to ensure development remain viable?
45. Given that site-specific viability appraisals have not been made available for site allocations, are the headline figures provided in Appendix B of SD86 / Appendix A of SD87 sufficiently detailed and explained to clearly demonstrate that all sites are financially viable?
46. Does the absence of a site-specific appraisal for HA7 (Land at Drewen Farm) based on the requirement for 50% affordable housing undermine the conclusions of the Viability Reports?
47. Whilst noting the Council's stance in paragraph 51.3 of M5/1, should the affordable housing target in Strategic Policy S7 be updated to ensure consistency with the evidence base?

Gypsy and Traveller Accommodation

48. Can all seven pitches be accommodated within the allocated site whilst ensuring satisfactory living conditions with regard to noise, and taking account of the need to provide noise barriers to each plot and the use of 'strategic alignment' of mobile homes (page 22 of S9 Noise Assessment [SD519]), as well as the retention of trees, hedgerows and woodland, along with potential further planting (as recommended at section 12 of the S9 Preliminary Ecological Appraisal [SD520])?

Hearing Session 6: Employment & Economy

Please note that, at this session, there will be no consideration of individual housing or employment allocations or how the range of policies under consideration might apply to them. Such sites will be considered at Hearing Sessions 9 - 12 inclusive as applicable.

49. In its Report of Consultation: Appendix 12 Deposit RLDP Consultation Responses Volume 14 Retail & Commercial Centres (SD49) at pages 24 & 25, the Council explained the relationship between any retail provision as part of strategic site allocations and other Plan policies, including Policy RC4, and the rationale for its position. If its policy position is not persuasive, please explain why.

50. The Council has suggested amendments, updates and a correction to Employment & Economy policies and associated explanatory text – see (M6/1g) at pages 37 - 39 inclusive. If it is considered that these amendments, updates and/or correction are not necessary, please explain why.
51. The Council has suggested an amendment to Policy RE5 – see (M6/1g) at page 39. If it is considered that this amendment is not needed, please explain why.
52. In its Hearing Statement (M6/1) at page 19, the Council has suggested an amendment to Appendix 10: Employment Land Schedule. If it is considered that this amendment is not required, please explain why.

Hearing Session 7: Climate Change, Green Infrastructure, Landscape and Nature Recovery

Please note that, at this session, there will be no consideration of individual housing allocations or how the range of policies under consideration might apply to them. Such sites will be considered at Hearing Sessions 9-12 inclusive as applicable.

53. In its Deposit RLDP Consultation Report Appendix 12 - Volume 4 Climate Change (SD36), at page 12, the Council explained why it considered that there was no need for inclusion of a policy caveat to explicitly allow for discretion in the application of Policy S4. Is this a logical and reasonable explanation? If not, how precisely should Policy S4 be changed, would either the policy or explanatory text need to advise when such discretion might be applied and, if so, what wording would you suggest?
54. Is the Council's suggested amendment to Policy S4, (M7/1c) at page 13, needed to comply with the soundness tests set out in the Manual? If not, please explain why.
55. Policy NZ1 applies to all new build residential development and not just strategic sites; in this respect, is it consistent with the provisions of para 5.8.5 of PPW 12?
56. Does Policy NZ1 fit with what Technical Advice Note (TAN) 'Design' says in respect of strategic sites at paragraphs 6.8 – 6.14 inclusive?
57. Does national policy suggest that national policy and guidance provide that the imposition of standards beyond the scope of Building Regulations is intended to be tested and justified on a site-by-site or strategic-site basis and not applied uniformly to all development through a blanket policy applicable to all new build residential development?
58. Giving reasons for your response, is a more focused approach to decarbonisation of new build residential development needed in order to support the delivery of sustainable housing without undermining viability or the broader housing supply?
59. Is the Council's position as to why it considers all the requirements of Policy NZ1 necessary and that it does not duplicate other statutory obligations such

- as the Building etc (Amendment) (Wales) Regulations 2026, as set out in paragraphs 82.1 – 82.6 inclusive of its Hearing Statement (M7/1), persuasive? Is its position consistent with the Welsh Government Development Plan Manual edition 3 (page 17), which states that: *‘Plans should not duplicate provisions in other legislative regimes for example, environmental health, building regulations and health and safety legislation.’*
60. Policy NZ1 sets out the need for an operational energy assessment with any planning application resulting in the creation of one or more dwellings. Does it include changes of use and/or conversion of buildings and not just new builds? Is the policy wording sufficiently clear in this respect?
 61. In its Hearing Statement (M7/1), paragraphs 81.2 – 82.4 inclusive, the Council explained its reasoning for the modelling it relied on its support of Policy NZ1. Is this a logical and reasonable explanation? Is consistent with Welsh Government’s approach to energy modelling of buildings?
 62. Does the second bullet point of Policy NZ1 need to be reviewed in light of the Building etc (Amendment) (Wales) Regulations 2026?
 63. Is the third bullet point of Policy NZ1 overly prescriptive?
 64. Does the fourth bullet point of Policy NZ1 replicate the provisions of Building Regulations Approved Document L (2026); is it needed?
 65. Paragraph 9.2.6 refers to new buildings whereas the fourth bullet point of Policy NZ1 refers to new homes – should this apparent ambiguity be addressed?
 66. In the absence of Supplementary Planning Guidance to set out the expectations of ‘as-built performance surveys’ how can this element of the Plan be properly assessed when considering the second and third tests for soundness?
 67. Over and above what is required by Building Regulations, is Policy NZ1 sufficiently precise in respect of what a built performance survey should include in order to demonstrate that new homes have been built to applicable standards and minimise the ‘performance gap’; is it duplicating the provisions of that legislative regime?
 68. In its Hearing Statement (M7/1), paragraphs 83.5-83.7 inclusive, the Council explained why it considers Policy CC1 to be necessary and not duplicate provisions in other legislative regimes. Is this a reasonable and persuasive explanation?
 69. Is the Council’s suggested amendment to Policy CC1, (M7/1c) at page 15, needed to comply with the soundness tests set out in the Manual? If not, please explain why.
 70. How have Policy S5 and associated policies taken account of the step wise approach set out in Planning Policy Wales – Edition 12 (PPW 12)?
 71. Is the Council’s suggested amendment to Policy S5, (M7/1c) at pages 17 & 18, needed to comply with the soundness tests set out in the Manual? If not, please explain why.
 72. Is the Council’s suggested amendment to Policy GI1, (M7/1c) at page 18, needed to comply with the soundness tests set out in the Manual? If not, please explain why.

73. In addition to policy set out above, the Council has also suggested a series of amendments and corrections to the explanatory text accompanying a number of the policies in the Climate Change and Green Infrastructure, Landscape & Nature Recovery sections of the Plan – see M7/1c at pages 13 to 26 inclusive. Are these needed to comply with the soundness tests set out in the Manual? If not, please explain why.

Hearing Session 8: Infrastructure, Transport, Minerals & Waste

Infrastructure

74. Strategic Policy S6 refers to the provision of health infrastructure and/or facilities, however these are not identified as requirements within the Infrastructure Delivery Plan. Given the references in paragraph 3.67 of the Infrastructure Delivery Plan Background Paper [SD104] to the potential for new services as part of the strategic allocations in Abergavenny and Caldicot, should these requirements be identified?
75. Several costs in the Infrastructure Delivery Plan are listed as 'TBC' and paragraph 107.5 of the Council's Hearing Statement M8/1 states there is a viability buffer to cover unknown costs. As this is also anticipated to meet the costs from nutrient mitigation measures and compliance with Policy NZ1, on what basis can the Council be confident that the viability buffer is sufficient, particularly given the potentially significant costs that may be associated with certain infrastructure requirements?
76. If specific infrastructure costs have been factored into the assessment of financial viability, do the Viability Report and Addendum [SD86 and SD87] provide sufficient detail to demonstrate this?

Transport

77. In the absence of identification in the Local Transport Strategy, is there sufficient certainty on the eventual routes of the schemes listed in Policy ST5 to enable these to be shown on the LDP Proposals/Constraints maps?
78. If the schemes listed in Policy ST5 cannot yet be spatially defined, can they be safeguarded in practice? Should the policy wording be amended to remove reference to safeguarding if this cannot be achieved?