



# Monmouthshire Replacement Local Development Plan 2018-2033

Phosphate Position Paper  
February 2026



monmouthshire  
sir fynwy

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# PHOSPHATE POSITION PAPER

## 1. Introduction and Background

### Purpose and Scope

- 1.1. The purpose of this Paper is to provide additional information on the Council's approach to addressing the effect of proposed development in the Replacement Local Development Plan (RLDP) on riverine Special Areas of Conservation (SACs) in relation to the discharge of phosphorous, as requested by the inspectors appointed to examine the RLDP. To assist the Council in responding the inspectors' requests, AECOM have been appointed to provide information on the potential increase in nutrient loading in the Usk and Wye catchments from the implementation of the RLDP and to consider potential high-level mitigation options to avoid or reduce any adverse effects on the SACs. This Paper has regard to the accompanying Technical Note produced by AECOM which is attached as Appendix 1. Full details of the matters raised by the inspectors are set out in their letter to the Council (1<sup>st</sup> December 2025) attached at Appendix 2.
- 1.2. This Paper addresses the following matters raised by the inspectors:
  - The significant environmental challenge posed by water quality issues in the River Wye and River Usk SAC catchments and an overview of the approach and work undertaken to date by Monmouthshire County Council (MCC) and its partners in addressing the issues, including an overview of the current and future strategies and actions of MCC and relevant Nutrient Management Boards.
  - Further information on the potential increase in nutrient loading from implementation of the RLDP.
  - Consideration of the recent judgement of *CG Fry & Sons Ltd v SSHCLG* [2025] UKSC 35 (in relation to the requirement for HRA on the discharge of planning conditions) on the delivery of committed sites and identify any assumptions made in relation to windfall allowances.
  - Consideration of whether nutrient contributions from non-residential development need to be considered.
  - Consideration of high-level mitigation options to avoid or reduce any adverse effects on the SACs.
  - High-level overview of the viability implications of potential mitigation measures.
  - A review of the Deposit RLDP policies.
- 1.3. It is recognised that further work will be needed fully address the matters raised by the inspectors, including refinement of potential/appropriate mitigation solutions and updates to the RLDP policy framework, IDP Background Paper and the HRA (in consultation with NRW). As agreed with the Inspectors, this work will progress to the end of April 2026. This position paper will be updated to reflect this.
- 1.4. It is recognised that addressing the impacts of phosphates is an evolving process. As this work progresses and additional information becomes available, this position paper will be updated as necessary to reflect the dynamic context.

### Background and Context

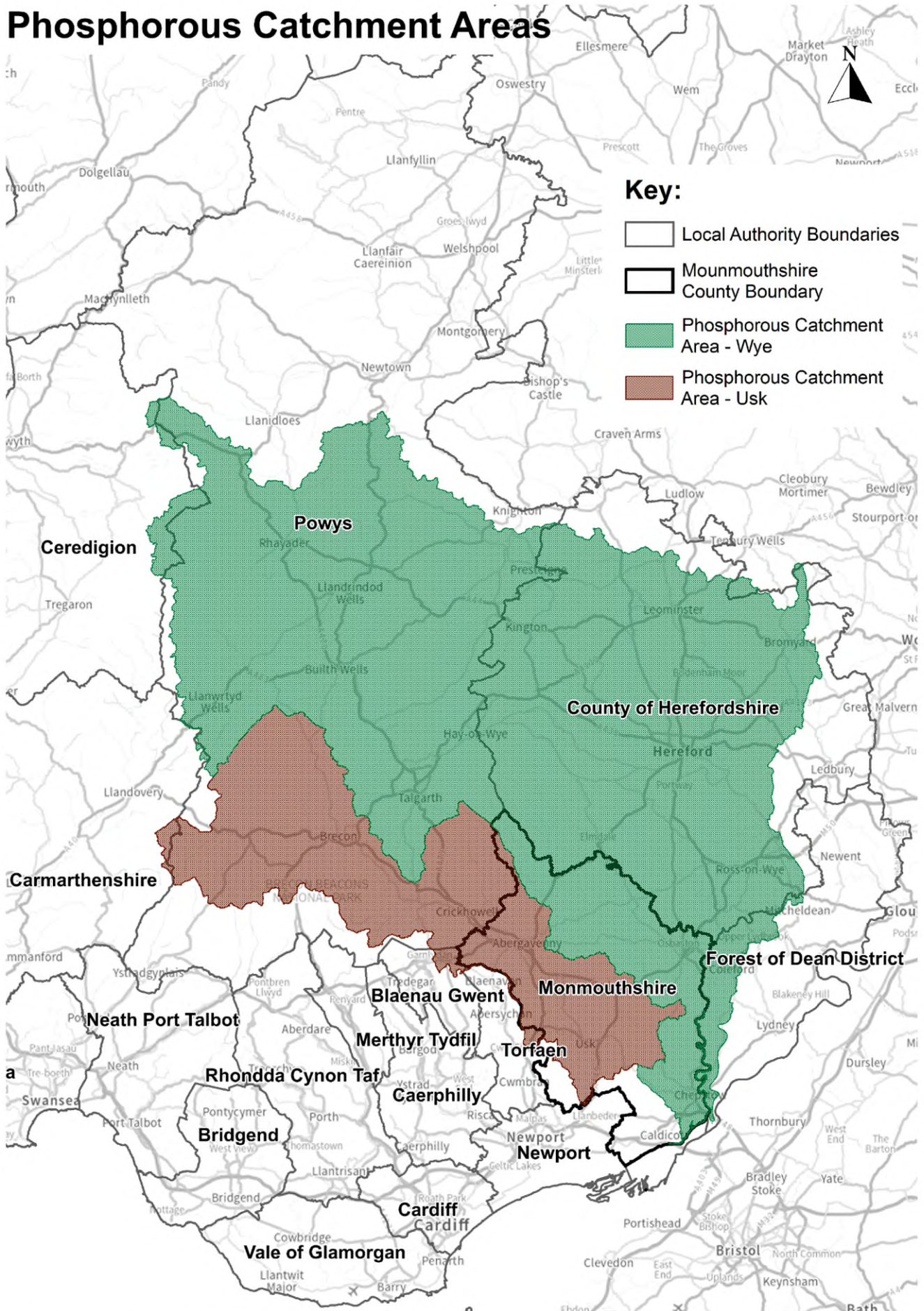
- 1.5. The impact of excess nutrients, including phosphates, has become a significant environmental challenge in riverine SACs across the country, including Wales. These rivers

are designated for their high ecological value, however, many are failing to meet strict phosphorous targets designed to protect sensitive habitats and species. High concentrations of nutrients, including phosphorus, can lead to the process of nutrient enrichment (i.e. eutrophication) and can alter the balance of plant species in our rivers causing significant ecological damage. Evidence from Natural Resources Wales (NRW) in January 2021 indicated that over 60% of SAC river water bodies in Wales were failing to meet the revised water quality targets for phosphorus, including the Usk and Wye in Monmouthshire.

- 1.6. Monmouthshire lies at the lower reaches of both the River Usk and River Wye, before they enter the Severn Estuary. While the issues set out affect the whole of the non-tidal stretches of both rivers, this paper focuses on the implications for Monmouthshire in terms of the development of the RLDP.
- 1.7. The Rivers Usk and Wye within Monmouthshire are designated as SACs and are, therefore, subject to strict protection under the Habitats Regulations. The extent of the SAC river catchments is illustrated in Map 1. Evidence published in 2021 indicated that both rivers had unacceptably high levels of phosphates resulting in harm to water quality and the ecosystem. More recent data does, however, indicate that water quality across the rivers in Monmouthshire has improved since 2021, and is considered further below.

Map 1

# Phosphorous Catchment Areas



- 1.8. Evidence demonstrates that approximately two-thirds of phosphate pollution within these river catchments derives from agricultural sources, including intensive poultry farming, fertiliser spreading and run-off from agricultural fields.

**Table 1: Phosphates Source Apportionment**

| Source                     | River Usk | River Wye |
|----------------------------|-----------|-----------|
| Agriculture                | 67%       | 72%       |
| Wastewater Treatment Works | 21%       | 23%       |
| Intermittent Discharges    | 1%        | 2%        |
| Other                      | 11%       | 3%        |

Source: SAGIS (Source Apportionment Geographical Information System) Modelling

- 1.9. In light of evidence demonstrating the environmental impacts of excess nutrients in rivers, and following the outcome of a high-profile court case, known as the Dutch case<sup>1</sup>, it became clear that stronger measures were required beyond traditional Nutrient Management Plans to improve water quality and safeguard river habitats. Consequently, in January 2021 NRW issued planning guidance relating to the output of nutrients, including phosphates, from development proposals to ensure that the environmental capacity of the affected rivers does not deteriorate further. The guidance ensures that developments proposals<sup>2</sup> in affected areas can only be granted planning permission where they are able to demonstrate a neutral impact or improvement in phosphate levels (i.e. nutrient neutrality or betterment). This planning guidance impacts on the decision-making of a number of local planning authorities across Wales, including Monmouthshire, in relation to their riverine SACs. Of note, NRW issued updated guidance in February 2026, and an all-Wales nutrient budget calculator has been developed to support the assessment of phosphorus and nitrogen impacts from new developments.
- 1.10. As part of the RLDP preparation process, the Council has to evidence that proposed site allocations can demonstrate a deliverable pathway to neutrality or betterment and/or ensure that development proposals do not have a significant adverse impact on water quality within the rivers. Following the introduction of NRW's guidance, Monmouthshire County Council has taken a leading role in working proactively and collaboratively with a range of organisations including NRW, Dŵr Cymru Welsh Water (DCWW), Welsh Government, other local authorities, environmental groups, nutrient management boards, the development industry and other stakeholders to further our understanding of the issue and identify solutions to enable growth and allocate sites through the RLDP process that do not harm the environmental capacity of our SAC rivers but instead see the health of these rivers

<sup>1</sup> The ruling in the European Court of Justice of the EU (CJEC) known as the Dutch case resulted in a change to how the Habitats Regulations are applied to plans or projects in the catchments of European designated sites that are under pressure from pre-existing levels of nutrients. As a result of this case, any new development within affected habitats site catchments that could increase nitrogen and phosphate deposition into the protected sites above consented levels must show that they are 'nutrient neutral'. Under the Habitats Regulations, planning authorities must consider the nutrient impacts of proposed developments on water quality within SAC river catchments.

<sup>2</sup> This guidance applies to a range of development types, including residential, tourism, agricultural buildings and non-residential uses generating wastewater.

safeguarded and restored. Details of the collaborative work, progress to date and implications for the RLDP are set out below.

### Nutrient Management Boards

- 1.11. Monmouthshire County Council is a member of the Usk Catchment Partnership, the Wye Nutrient Management Board and the Wye Statutory Officers Group. These groups seek to address the catchment issues through a whole catchment approach to achieve long-term ecological sustainability within the river catchments.
- 1.12. As part of the Council's commitment to addressing the climate and nature emergency and in recognition of the urgent need to address water quality in the County, the Motion for Rivers and Ocean Action Plan sets out measures to tackle river water quality, utilising existing partnerships to provide a co-ordinated approach. As part of this, the Council has continued involvement with the Wye Nutrient Management Board and Usk Catchment Partnership to identify and implement options for delivering improvements in water quality.

### The Usk Catchment Partnership & The River Usk Nutrient Management Plan

- 1.13. The Usk Catchment Partnership is a Welsh Government supported initiative bringing together statutory bodies and interested parties around a shared aim to restore the ecological health and resilience of the River Usk and its catchment. The main contributors include Local Planning Authorities, Wye and Usk Foundation, Gwent Wildlife Trust, NRW, DCWW, farming representatives, community representatives and Cardiff Water School.
- 1.14. In April 2025, the Partnership published The River Usk Nutrient Management Plan (NMP). The NMP aims to achieve nutrient neutrality, improve SAC feature conditions, and enable sustainable development while enhancing resilience to climate change and flooding. The plan is the first iteration of a long-term strategy, relevant to 2030 but designed to evolve through bi-annual updates. The Plan provides a useful overview of the main pressures on water quality in the River Usk including sources of phosphorus pollution. As outlined in Table 1 above, agricultural intensive practices and legacy phosphorus in soils are major contributors, accounting for 67% of phosphorus in the River Usk SAC catchment. Wastewater Treatment Works account for an additional 21% of phosphorus load. NRW's permit review imposes tighter P limits of at least 5mg/litre, affecting 30 WwTWs, with AMP upgrades accelerating compliance. Private sewage systems, including septic tanks and package treatment plants, and other factors including biosolids spreading, housing growth (proposing to connect to smaller WwTWs without a phosphorus limit in the environmental permit), climate change (altered rainfall patterns, higher temperatures), modified watercourses, and abstraction pressures account for a small proportion of the phosphorus load.
- 1.15. To address the main causes of water quality issues in the River Usk catchment, the NMP establishes the following key objectives:
  - Reduce phosphorus loading from rural land use, wastewater treatment works (WwTWs), and private sewage systems.
  - Enable nutrient-neutral housing development across the catchment.
  - Promote Nature-based Solutions (NbS) such as soil health improvements, tree planting, wetlands and flow pathway measures to reduce nutrient runoff and provide multiple benefits, including flood mitigation and biodiversity enhancement.
  - Engage farmers and communities in co-designing interventions and monitoring progress.

- Develop tools and evidence to guide interventions, notably the Usk Nutrient Portal, an online GIS platform for planning NbS.

- 1.16. Initial next steps of the NMP are to obtain funding to begin delivery of NbS in priority areas, expand farmer engagement and strengthen monitoring through statutory and citizen science.

#### River Wye Special Area of Conservation Nutrient Management Board

- 1.17. The objective of the River Wye Nutrient Management Board (NMB) is to identify and deliver actions that achieve the phosphorous conservation target of the River Wye SAC. The primary mechanism for achieving this will be through the delivery of the Nutrient Management Plan (NMP). The NMB are the responsible body for ensuring the delivery of the Conservation Objectives for the River Wye SAC and provide oversight and direction in delivering the NMP.
- 1.18. The NMB provides a forum for all stakeholders to come together to influence, advise and challenge those having an impact on the river or delivering improvements across the catchment. Monmouthshire County Council sit on the Wye NMB alongside a voluntary board of partners and stakeholders with an interest in improving water quality in the catchment and who have a role in delivering that outcome. This includes local public interest groups, local authorities and statutory organisations. The NMB steer and advise the River Wye Statutory Officers Group and Technical Advisory Groups. The NMB does not have any formal powers or resources, and any decision-making lies with the individual statutory organisations via the Statutory Officers Group, subject to approval within their own organisations as necessary.

#### River Wye Statutory Officers Group

- 1.19. The River Wye Statutory Officers Group is responsible for the Nutrient Management Plan and agree actions, provide technical expertise and advice to support action development and delivery via the Technical Advisory Groups. Monmouthshire County Council sit on this group with other statutory organisations and LPAs both in England and Wales including NRW, Natural England, Environment Agency, DCWW, Herefordshire Council, Powys County Council, Bannau Brycheiniog National Park Authority and Forest of Dean District Council. These organisations operate within the catchment to restore the Conservation Status of the River Wye Special Area of Conservation.
- 1.20. The River Wye SAC Nutrient Management Plan Phosphates Action Plan<sup>3</sup> (November 2021) will inform the Wye Nutrient Management Plan (NMP) for both the Welsh and English sides of the catchment providing the first step towards a full river restoration plan. This Action Plan recognises that the solution is not simply one of reducing the flow of nutrients into the system but rather understanding and responding to the complex interactions that determine the overall SAC condition. A more holistic ecosystem approach to implement the most appropriate suite of actions at any given location is required.

#### Phosphorus in the River Wye: Evidence Base and Options Report

- 1.21. In order to develop a whole catchment NMP, evidence is required from both the Welsh and English sides of the River Wye catchment. Accordingly, an evidence base and options appraisal has been published specifically for phosphorus pollution in the River Wye in Wales<sup>4</sup> (in addition to that prepared for the English side). This report provides evidence that the

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<sup>3</sup> Prepared by the Technical Advisory Group

<sup>4</sup> Phosphorous in the River Wye: Evidence Base for Wales (November 2025)

agricultural sector is the largest source of phosphorus concentration at 72%, followed by wastewater final treated effluent discharges (23%), storm overflows (2%) and septic tank/urban run-off (3%) (as set out in Table 1). Extensive modelling and scenario analysis indicated that substantial reductions in agricultural phosphorus loading can be achieved through targeted regulatory compliance, best practice and agri-environmental interventions, supported by planned upgrades to WwTW. It is recognised in the report that water quality across the Welsh River Wye has improved significantly since 2021, with the Lower Wye in Monmouthshire reaching moderate compliance in 2024; this is considered further below. A range of mitigation measures that could be taken forward as part of the updated River Wye NMP to achieve SAC compliance for the Welsh River Wye catchment are included within the report including:

- Improvements to agricultural practices and infrastructure
- Storm overflow improvements
- Further investment in phosphorus treatment in WwTWs
- Private sewerage system upgrades

#### Wye Catchment Management Plan/Nutrient Management Plan

- 1.22. The River Wye Nutrient Management Board, working with the Wye Catchment Partnership, is preparing a new catchment-wide Nutrient Management Plan as part of the emerging wider updated Wye Catchment Management Plan (CMP) covering the River Wye and River Lugg. The overarching aim of the CMP is to recover the Wye and Lugg SSSIs/SAC to Favourable Condition/Favourable Conservation Status. This work will be informed by updated cross-border evidence to address ongoing phosphate pressures within the whole catchment<sup>5</sup>, thereby ensuring an integrated cross-border approach to nutrient reduction. The CMP will be a fully costed, catchment-wide plan identifying funding opportunities and setting out solutions to key issues, including water-quality impacts from nutrient pollution. It is anticipated that the CMP will be published in 2026.

#### Dŵr Cymru Welsh Water – WwTW Upgrades

- 1.23. DCWW has committed to investing in the reduction of phosphorus contribution for WwTW discharges as part of their asset management plans (AMPs). This included an initial investment of £100 million within AMP7 (2020-2025) and a further £60 million across Wales by the end of 2025.
- 1.24. DCWW plans further significant investment in AMP8 (2025–2030) to reduce phosphorus pollution in both the River Usk and River Wye catchments. In the River Usk Catchment over £11 million will be invested in phosphorus reduction measures. DCWW expects these actions to remove 36.3 kg/day of total phosphorus by 2032, with major progress in the first five years. In Monmouthshire these upgrades include £2.86 million to be directed to upgrades at Llanarth, Goytre, and Aberbaiden WwTWs<sup>6</sup>. In the River Wye Catchment over £50 million is allocated for phosphorus reduction, supporting DCWW's goal to meet its fair-share target by 2032. This includes approximately £4 million to improve treated effluent at Monmouth, Grosmont, Pandy, and Dingestow WwTWs. The AMP8 investments will continue to further improve water quality in the Usk and Wye over the Plan period and the impact of these

<sup>5</sup> Phosphorous in the River Wye: Evidence Base for Wales (November 2025); Diffuse Water Pollution Plan (Natural England, November 2025)

<sup>6</sup> Aberbaiden Wastewater Treatment Works is within the Monmouthshire part of the Bannau Brycheiniog National Park Authority.

improvements will be reviewed as part of NRW's WFD which will influence planning decisions at that time.

- 1.25. In preparing the RLDP, the Council has worked closely with DCWW and NRW to implement major upgrades that enable phosphate stripping capability at two key wastewater treatment works in the County: Monmouth (benefiting the River Wye Catchment) and Abergavenny (Llanfoist) (benefiting the upper River Usk catchment). The Raglan WwTW also has phosphate stripping capability in place. This investment has and will continue to significantly reduce the amount of phosphates entering the water environment from the treatment works (and the outfall from the existing population), thereby securing environmental improvements and potentially creating headroom for new development, including housing, commercial and retail proposals, supporting the long-term sustainability of towns and communities while safeguarding water quality and maintaining the integrity of designated sites.

#### Natural Resources Wales Environmental Permit Review

- 1.26. In parallel, NRW has conducted a targeted review of environmental permits<sup>7</sup> and associated water quality evidence within the affected catchments to determine the extent of any operational headroom/capacity at the WwTWs to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels. This pan-Wales headroom-based approach has been progressed with the support of Welsh Government.
- 1.27. NRW's Environmental Permit Review has confirmed the potential to use existing capacity within a number of existing wastewater treatment plants in Monmouthshire to enable sustainable growth in various settlements in the affected catchment areas, subject to a detailed appropriate assessment being conducted in agreement with NRW. In response, the Council is applying the latest NRW guidance, making appropriate use of available permit headroom and implementing the 'fair share approach' when considering development proposals within these catchments. This approach recognises that wastewater discharges represent only one component of overall phosphate load and that significant phosphate contributions also arise from non-wastewater sources, including agriculture. At the planning application a detailed consideration needs to be undertaken about the level of residual phosphate from a proposed development and whether that proposal would harm the integrity of the River SAC and have the potential to have a significant effect.

#### Latest Water Quality Status – Lower River Wye and River Usk

- 1.28. Recent data<sup>8</sup> indicates that water quality across the rivers in Monmouthshire has improved since 2021. The SAC Assessment phosphorus target for the Lower River Wye within Monmouthshire is <39 µg/l. The latest monitoring data demonstrates that phosphorus levels in this part of the River Wye have decreased from 52 µg/l in 2021 to 33.9 µg/l in 2024, and as a result are below the SAC Assessment target. Of note, this monitoring data precedes the implementation of P stripping at the Monmouth WwTW which should further improve water quality. NRW has subsequently confirmed that the Lower Wye in Monmouthshire is no longer a failing SAC and, as such development restrictions on neutrality can be lifted in this

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<sup>7</sup> In December 2023, NRW launched a comprehensive review of WwTW permits in Special Area of Conservation (SAC) river catchments across Wales. This marked a major regulatory intervention intended to tackle rising phosphorus levels and unblock stalled planning processes in affected areas.

<sup>8</sup> WFD monitoring data '2024 Compliance Assessment' covered the four year period of 1<sup>st</sup> January 2020 – 31<sup>st</sup> December 2023.

part of the water body<sup>9</sup>. Continued proposed interventions to address phosphorus levels over the Plan period, including NMB proposals, are expected to further improve water quality in the the Lower Wye and, as a consequence the betterment trajectory for this waterbody is considered to be positive. Notwithstanding this, NRW has advised MCC that evidence is needed to demonstrate whether the implementation of the RLDP would return this part of the river to failing status or not. This will be considered as part of the additional scope of works to be completed by the end of April 2026. This Position Paper will be updated accordingly.

- 1.29. The latest monitoring data for the River Usk catchment demonstrates that 54% of waterbodies in the catchment are currently meeting their phosphorus targets<sup>10</sup> which is an improvement from 2021. Notwithstanding this, nutrient neutrality remains a requirement across the whole Usk catchment. Ongoing actions, including AMP8 investments, 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 as the Plan progresses.

#### Implications for the Monmouthshire RLDP

- 1.30. The commitment by DCWW to implement phosphate mitigation at key WwTW, together with the environmental permit approach agreed with NRW, DCWW and Welsh Government, has enabled the allocation of sustainable affordable-led residential and mixed-use sites in the affected catchment areas. Further details of the permit review in relation to proposed RLDP allocations and commitments are set out Section 2 of this Paper. Upgrades to the WwTW have already reduced the volume of phosphates entering riverine SACs from the existing population, providing environmental improvement and reducing the impact from new development, and will further lower phosphate discharge resulting from the limited affordable housing-focused growth proposed in the RLDP. Additional planned WwTW upgrades will further reduce phosphorus levels. However, it is recognised that this approach will not eliminate all increases in total phosphorus (TP) from future development and, therefore, additional mitigation will be required to ensure that development proposed in the RLDP is nutrient neutral in terms of TP.
- 1.31. In developing the RLDP's growth and spatial strategy, it is notable that the Preferred Strategy consultation in December 2022 proposed no new allocations in the primary settlement of Monmouth, or within the upper River Wye catchment north of Bigsweir Bridge. This approach was taken due to the lack of an identified strategic solution to the treatment of phosphates at the Monmouth WwTW within the Plan period. However, Welsh Government's response to the Preferred Strategy advised that new site allocations should be considered in Monmouth on the basis that sufficient certainty is provided by DCWW's planning improvements at the Monmouth WwTW by 31<sup>st</sup> March 2025. The removal of this spatial constraint in the Monmouth area meant that the Deposit RLDP could allocate new affordable housing-led development within Monmouth. This was considered essential to assist in addressing the Plan's key objectives, including the delivery of much needed affordable housing and allowing development that supports the economic growth of the area.
- 1.32. The above demonstrates that a range of measurable solutions to address the phosphate issue in the riverine Usk and Wye SACs have, and continue to, emerge. It is, however, recognised that a whole catchment approach and continued/further collaboration is needed

<sup>9</sup><https://naturalresources.wales/about-us/news-and-blogs/news/new-water-quality-data-sheds-light-on-health-of-wales-s-waters/?lang=en>

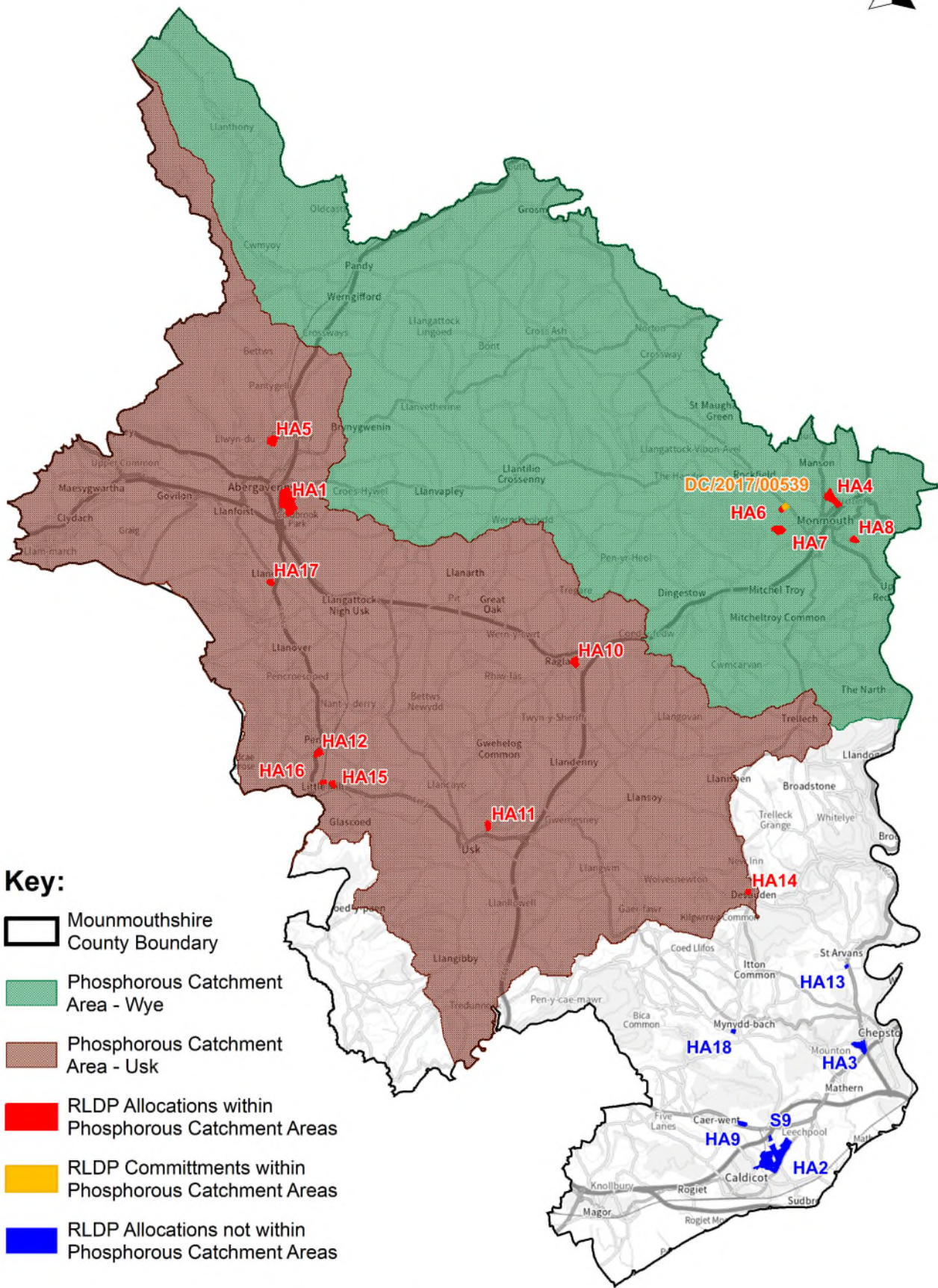
<sup>10</sup> River Usk Nutrient Management Plan (April 2025)

across a range of sectors, including government, agriculture, water industry, development industry and communities to ensure the health of our rivers is restored for the long term. As noted, the Lower Wye in Monmouthshire is no longer a failing SAC and in view of the interventions to address phosphorus levels, water quality is expected to further improve in this waterbody over the RLDP period.

## **2. Riverine SAC Catchment Areas – Affected RLDP Allocations and Commitments**

- 2.1. As illustrated by Map 1, approximately one third of the County is impacted by the River Usk phosphorus sensitive catchment area, and one third by the River Wye phosphorus sensitive catchment area. As noted above, the Lower Wye in Monmouthshire is no longer a failing SAC, however, given the sensitivity of this catchment and as a competent authority MCC is considering this catchment as part of this Position Paper to ensure the total phosphorus load of the RLDP is considered as part of the detailed HRA. The remaining area, situated to the south of the County, is not affected by phosphates and is, therefore, not subject to the nutrient neutrality or betterment requirements.
- 2.2. In order to inform the potential phosphorus (P) load to arise from the implementation of the RLDP, a review of all allocations and residential commitments has been undertaken to identify the sites that could potentially contribute to phosphate levels in each of the SAC riverine catchments, the results of which are set out in Map 2 and discussed below.

Residential & Mixed Use Allocations and Phosphorous Catchment Areas



### Residential/Mixed-use Allocations and Commitments within the Phosphorus Sensitive Catchments

- 2.3. With regard to residential proposals, for completeness all residential/mixed-use commitments that have contributed to completions in the Plan period to date (2018 – 2025) or that have an extant planning permission have been reviewed. The results are set out in Appendix 2. An overview of the residential/mixed-use allocations and commitments that are identified as having a potential to impact on the River Usk and River Wye SACs are set out in the tables below.
- 2.4. Within the phosphorus sensitive catchment area of the River Usk SAC, nine residential/mixed-use allocations have been identified and factored into the P load budget calculations, as set out in Table 2. No commitments have been identified in this catchment.

**Table 2: RLDP Residential and Mixed-use Allocations within the River Usk SAC Catchment**

| RLDP Policy Ref | Site Name                          | Settlement  | Status                                         | Proposed Use | No of Units | Open Market Homes | Affordable Homes | Wastewater Treatment Works |
|-----------------|------------------------------------|-------------|------------------------------------------------|--------------|-------------|-------------------|------------------|----------------------------|
| HA1             | Land to the East of Abergavenny    | Abergavenny | Allocation                                     | Mixed-use    | 500         | 250               | 250              | Llanfoist                  |
| HA5             | Land at Penlanlas Farm             | Abergavenny | Allocation                                     | Residential  | 100         | 50                | 50               | Llanfoist                  |
| HA10            | South of Monmouth Road             | Raglan      | Allocation                                     | Residential  | 54          | 27                | 27               | Raglan                     |
| HA11            | Land East of Burrium Gate          | Usk         | Allocation                                     | Residential  | 40          | 20                | 20               | Usk                        |
| HA12            | Land West of Trem Yr Ysgol         | Penperlleni | Allocation                                     | Residential  | 42          | 21                | 21               | Goytre                     |
| HA14            | Land at Churchfields               | Devauden    | Allocation                                     | Residential  | 20          | 10                | 10               | Devauden                   |
| HA15            | Land East of Little Mill           | Little Mill | Allocation                                     | Residential  | 20          | 10                | 10               | Little Mill                |
| HA16            | Land North of Little Mill          | Little Mill | Allocation (Rollover with planning permission) | Residential  | 15          | 7                 | 8                | Little Mill                |
| HA17            | Land Adjacent Llanellen Court Farm | Llanellen   | Allocation                                     | Residential  | 26          | 13                | 13               | Llanellen                  |

- 2.5. Within the River Wye phosphorus sensitive catchment area, one commitment and four residential allocations have been identified and factored into the P load budget calculations.

**Table 3: RLDP Residential Allocations/Commitment within the River Wye SAC Catchment**

| RLDP Policy Ref | Site Name              | Settlement | Status                                                  | Proposed Use | No of Units | Open Market Homes | Affordable Homes | Wastewater Treatment Works |
|-----------------|------------------------|------------|---------------------------------------------------------|--------------|-------------|-------------------|------------------|----------------------------|
| HA4             | Land at Leasebrook     | Monmouth   | Allocation                                              | Residential  | 270         | 135               | 135              | Monmouth                   |
| HA6             | Land at Rockfield Road | Monmouth   | Allocation                                              | Residential  | 60          | 30                | 30               | Monmouth                   |
| HA7             | Drewen Farm            | Monmouth   | Allocation (Rollover with resolution to approve subject | Residential  | 110         | 71                | 39               | Monmouth                   |

|     |                |          | to a S106 Agreement)                           |             |    |    |    |          |
|-----|----------------|----------|------------------------------------------------|-------------|----|----|----|----------|
| HA8 | Tudor Road     | Monmouth | Allocation (Rollover with planning permission) | Residential | 50 | 0  | 50 | Monmouth |
| N/A | Rockfield Road | Monmouth | Commitment                                     | Residential | 70 | 45 | 25 | Monmouth |

### Windfall Allowance

- 2.6. Windfall sites are sites with a capacity of 10 or more homes that are not specifically allocated for housing yet come forward during the Plan period. The Council's approach to calculating the windfall allowance factored into the housing supply figures of the RLDP is set out in the Housing Background Paper (Updated October 2025) (SD103). In summary, a Housing Potential Study (HPS) (see Appendix 1 of the Housing Background Paper) has been used as a basis for the windfall allowance. The study has looked at the availability of land and under used buildings within the primary and secondary settlements of Monmouthshire, including possible regeneration schemes and empty homes and upper floors within town centres which have the potential to provide additional homes. Overall, the windfall allowance contributes 200 homes to the overall housing supply figures across the County.
- 2.7. In line with the findings of the HPS, 120 units have been factored into the budget calculations for the Usk SAC catchment (100 in Abergavenny and 20 for the Rural Secondary Settlements of Raglan, Penperlleni and Usk) and 10 units for the Wye SAC catchment for Monmouth. The remaining units of the windfall allowance are in areas outside of the affected SAC catchment areas.
- 2.8. The allocations, commitments and windfall allowance outlined above have formed the basis of the nutrient budget estimates discussed in Section 3 and include several developments which already have planning permission. An update to the HRA, assessing the findings of the nutrient neutrality budget calculations forms part of the additional work programme to follow. In this respect, the technical work undertaken on the estimated phosphorus load of the RLDP is considered to have regard to the recent judgement of *CG Fry & Sons Ltd v SSHCLG* [2025] UKSC 35, which confirms the requirement for a HRA applies to the consideration of reserved matters and discharge of conditions.

### Gypsy and Traveller Allocation

- 2.9. Strategic Policy S9 – Gypsy and Travellers, of the RLDP allocates Land at Bradbury Farm, Crick for seven pitches to accommodate unmet Gypsy and Traveller accommodation needs. The allocation is located in the south of Monmouthshire, outside of the affected riverine SAC catchment areas, and has therefore not been factored into the potential P load of the RLDP.

### Employment and Solar Allocations

- 2.10. Table 4 and Map 3 set out the RLDP employment allocations and a potential site for ground mounted solar that are within either the River Wye or River Usk SAC phosphorus sensitive catchment areas. NRW advice regarding nutrient neutrality applies to any development that increases nutrient levels within affected catchments. In relation to non-residential developments, it notes this involves developments expected to serve a population from outside of a nutrient neutrality catchment who are not already served by residential connections to existing public or private sewers discharging within the nutrient neutrality

catchment. In relation to commercial and industrial developments, the example of a conference centre facility is given.

- 2.11. Whilst there a number of employment allocations within the River Usk and River Wye SAC catchments, these have not been factored into the nutrient budget estimates discussed in Section 3. The proposed level of growth set out in the RLDP aims to provide a balance of housing and employment growth, as required by national planning policy. This alignment aims to deliver employment opportunities for local residents, that are not reliant on unjustified levels of in-commuting. The employment allocations listed in Table 4, are considered to be locally scaled, ranging in size from 0.59ha to 4.5ha. The larger, more strategic employment allocations, are located in the south of the County and outside of an affected SAC catchment area, for example, EA1h – Gwent Euro Park (7ha) and EA1f – Quay Point (14ha) both of which are located in Magor. The employment allocations located within the SAC catchment areas are therefore assumed to be providing employment opportunities for the local population already served by residential connections to existing public or private sewers discharging within the SAC river catchments or within the calculations factored in for the residential allocations/commitments. Specific proposals will, however, be assessed on a case-by-case basis at the planning application stage, once firmer details are known in relation to the end users, to determine if the proposal will have an adverse effect on the integrity of the river SAC, in accordance with the RLDP policy framework and relevant NRW guidance. Each proposal would conduct a Habitats Regulations Assessment (HRA) to determine whether it would have a significant impact on the integrity of the river. Of note, the larger employment sites in the north of the County at Raglan and Monmouth would be connected to treatment systems that have phosphate stripping capability and, therefore, there would only be a residual amount of phosphate to mitigate if necessary.
- 2.12. The proposed solar allocation has not been factored into the budget calculations as consistent with NRW's exemption guidance, it is considered to represent a form of development that does not increase the volume and concentration of nutrients in wastewater.

**Table 4: RLDP Employment Allocations within the River Usk and River Wye SAC Catchments**

| <b>RLDP Policy Ref</b> | <b>Site Name</b>                                                                                                                                                   | <b>Settlement</b> | <b>Riverine SAC Catchment</b> | <b>Area (Ha)</b>             | <b>Use Class</b> |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------|------------------------------|------------------|
| EA1a                   | Land at Nantgavenny Business Park                                                                                                                                  | Abergavenny       | Usk                           | 0.59                         | B1               |
| EA1b                   | Poultry Units, Rockfield Road                                                                                                                                      | Monmouth          | Wye                           | 1.3                          | B1               |
| EA1c                   | Land North of Wonastow Road                                                                                                                                        | Monmouth          | Wye                           | 4.5                          | B1, B2, B8       |
| EA1i                   | Raglan Enterprise Park (Policy CC2 – Renewable Energy Allocation allocates approximately 16ha of land as having potential for a ground mounted solar development). | Raglan            | Usk                           | 1.5<br>(plus 16ha for solar) | B1, B2, B8       |
| EA1j                   | Land West of Raglan                                                                                                                                                | Raglan            | Usk                           | 4.5                          | B1, B2, B8       |
| EA1k                   | Land to the East of Abergavenny (forms part of residential allocation HA1)                                                                                         | Abergavenny       | Usk                           | 1                            | B1               |

 Mounmouthshire  
County Boundary

 Phosphorous Catchment Area - Wye

 Phosphorous Catchment Area - Usk

■ Employment Allocations within Phosphorous Catchment Areas

■ Employment Allocations not within Phosphorous Catchment Areas

### Renewable Energy Allocation within Phosphorous Catchment Areas

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Not to Scale

## Other Proposals

- 2.13. The RLDP does not propose any site allocations for uses other than residential (including mixed-uses), employment, renewable energy (solar development) and a Gypsy and Traveller site. The potential impact on phosphates from other relevant uses, such as tourism, will be considered on a case-by-case basis against the policy framework in the RLDP and any other relevant guidance issued by NRW as part of the planning application process. These have therefore not contributed to the P load calculations. Further details on the consideration of planning applications are set out in Section 5 below.

## Approach to Dwelling Numbers and Densities and Implications for On-site Mitigation

- 2.14. The incorporation of sustainable placemaking, high quality sustainable design and green infrastructure within new development is a key objective of the RLDP and is key theme running through a number of policies, most notably Strategic Policy S3 – Sustainable Placemaking & High-Quality Design, GI1 – Green Infrastructure, Strategic Policy S8 – Site Allocation Placemaking Principles and the site-specific allocation policies HA1 – HA18. Similarly, the incorporation and distribution of sustainable drainage systems (SuDS) within the residential allocations is a key requirement of proposals as required by Schedule 3 of the Flood and Water Management Act 2010 and Policy CC1 – Sustainable Drainage Systems.
- 2.15. These over-arching principles have formed an integral part in determining the approach to the dwelling numbers and densities of the allocations in the RLDP. The allocated sites have been assessed through the candidate sites assessment process as set out in the Candidate Sites Assessment Methodology (SD177), the outcome of which is set out in the Candidate Sites Assessment Report (SD179). Consultation and dialogue with external and internal stakeholders have been undertaken throughout the plan making process in relation to the candidate sites and continued in relation to allocated sites as the Plan has progressed. This has been instrumental in influencing key parameters of site allocations such as SuDS, necessary buffer zones within the sites and key landscape settings such as the BBNP and the green infrastructure and placemaking-led approach discussed above. Input from the Design Commission from Wales has also helped shape the progression of strategic housing allocations HA1 – HA4.
- 2.16. These considerations have informed the proposed dwelling numbers and densities of the residential allocations and have informed policy requirements set out in the site-specific allocation policies. As such, the dwelling numbers and densities have been driven by the individual site context and setting rather than a blanket target density. This approach has resulted in a range of gross densities ranging from 9.52 dwellings per hectare to 40 dwellings per hectare, and an average gross density of 16.83 dwellings per hectare. A breakdown of each residential allocation and associated densities is set out in Appendix 3. Once allowance is made for green infrastructure and open space, SuDS and non-residential uses on the mixed-use sites, the net density ranges from 20 dwellings per hectare to 47 dwellings per hectare, and an average of 29 dwellings per hectare across all the site allocations. This approach is considered appropriate in a Monmouthshire context, given its rural character, associated environmental constraints, the green infrastructure and placemaking-led approach to development and the site-specific considerations that influence the appropriate level of development. Further details on site specific considerations can be found in the supporting evidence base relating to the site allocations.
- 2.17. The Council's overarching approach to green infrastructure and SuDS, and resultant site allocations densities provide the potential to contribute to on-site mitigation and to reduce phosphorus loads in surface water run-off. The Technical Note prepared by Aecom

(Appendix 4) advises that most SuDS features can provide an opportunity to remove nutrients from surface water drainage if they are suitably designed and maintained, with details on the varying effectiveness of different SuDS features discussed further in the Technical Note. The incorporation of SuDS within the proposed site allocations has been an integral part of the development plan process from the outset and, as such, site promoters have factored this into illustrative masterplans and associated viability assessments. The provision of SuDS is, therefore, considered to be a deliverable element of the site allocations.

### Wastewater Treatment Works and Permit Reviews

- 2.18. The proposed RLDP residential/mixed-use allocations and commitments will connect to eight different Wastewater Treatment Works (WwTWs) situated within the County. As noted above, DCWW are investing in their WwTWs to reduce phosphate in the failing SAC rivers within their operating area, this includes upgrades completed to date at Monmouth and Llanfoist WwTWs that incorporate phosphate stripping. Of note, the Raglan WwTW also has phosphate stripping in place. The latest DCWW data (January 2026) indicates that the phosphorus stripping infrastructure in these WwTWs achieves the following phosphorus removal rates:
- Llanfoist: 82.86%
  - Monmouth: 80%
  - Raglan: 91.43%
- 2.19. DCWW have made a commitment in AMP8, covering the period 2025 to 2030, that none of their WwTWs will be the cause of ecological failure. Through their phosphorus investment plan, DCWW aim to remove 90%<sup>11</sup> of the phosphorus load from their WwTWs discharging to failing SAC rivers and expect this programme of works to be completed by 2032.
- 2.20. Table 5 provides details of the relevant WwTWs in Monmouthshire that the proposed RLDP site allocations and commitments will discharge into. This includes permit issue dates and phosphorus (P) limits, together with the latest rolling average provided by DCWW in December 2025. All of the associated WwTWs have relevant permits in place and are operating within the effective P limits in place at the WwTW, with the exception of Devauden. DCWW are committed to delivering a scheme to ensure compliance at the Devauden WwTW by January 2027. Accordingly, the first housing completions are not anticipated at the proposed allocation at Land at Churchfields, Devauden (HA14) until 2028/2029.

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<sup>11</sup> DCWW note that this is as a collective across all WwTW, some remove more than 90% and some less than 90%, based on permit requirements.

**Table 5 – Wastewater Treatment Works, Permit Information and P limit across sites within the River Usk and River Wye SAC Catchments**

| Wastewater Treatment Works | Allocated sites/commitments that utilise WwTW                                                                                                                                           | Permit Issue Date | P limit mg/l (1) | Effective Date P limit (1) | P limit mg/l (2) (limit will be reduced to) | Effective Date P limit (2) | Latest rolling average (DCWW, January 2026) |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|----------------------------|---------------------------------------------|----------------------------|---------------------------------------------|
| Llanfoist                  | HA1 Land to the East of Abergavenny<br>HA5 Land at Penlanlas Farm                                                                                                                       | 06/11/2023        | 5mg/l            | 13/11/2023                 | 2mg/l                                       | 31/12/2025                 | 2.64mg/l <sup>12</sup>                      |
| Monmouth                   | HA4 Land at Leasbrook<br>HA6 Land at Rockfield Road<br>HA7 Land at Drewen Farm<br>HA8 Land at Tudor Road, Wyesham<br>DM/2017/00539 – O/L permission at West of Rockfield Road, Monmouth | 06/11/2023        | 2mg/l            | 13/11/2023                 | -                                           | -                          | 0.99mg/l                                    |
| Raglan                     | HA10 South of Monmouth Road                                                                                                                                                             | 13/04/2023        | 1mg/l            | 13/04/2023                 | -                                           | -                          | 0.24mg/l                                    |
| Usk                        | HA11 Land East of Burrium Gate                                                                                                                                                          | 12/12/2023        | 5mg/l            | 19/12/2023                 | -                                           | -                          | 4.25mg/l                                    |
| Goytre                     | HA12 Land West of Trem Yr Ysgol                                                                                                                                                         | 27/11/2023        | 5mg/l            | 04/12/2023                 | 1.4mg/l                                     | 31/03/2030                 | 4.54mg/l                                    |
| Devauden                   | HA14 Land at Churchfields                                                                                                                                                               | 15/05/2024        | 5mg/l            | 26/01/2027                 | -                                           | -                          | Permit not live.                            |
| Little Mill                | HA15 Land East of Little Mill<br>HA16 Land North of Little Mill                                                                                                                         | 31/01/2024        | 5mg/l            | 07/02/2024                 | -                                           | -                          | 5.35mg/l <sup>13</sup>                      |
| Llanellen                  | HA17 Land adjacent Llanellen Court Farm                                                                                                                                                 | 08/02/2024        | 5mg/l            | 15/02/2024                 | -                                           | -                          | 3.64mg/l                                    |

<sup>12</sup> DCWW confirm that Llanfoist WwTW is compliant with the 2mg/l limit in terms of spot concentration however, this is not seen in the rolling average to date due to the nature of the assessment taking into consideration historic data.

<sup>13</sup> DCWW note the Life Cycle Inventory (LCI) is compliant.

### 3. Phosphate Budget Calculations

#### Potential Increase in Nutrient Loading from the Implementation of the RLDP

- 3.1. In recognition of the need to ensure the RLDP is supported by suitably robust nutrient neutrality budget calculations, AECOM have been appointed to undertake budget calculations for all proposed RLDP allocated and committed residential/mixed-use development using the Wales Nutrient Budget Calculator, which covers both the River Usk and River Wye catchments. This is needed to give confidence that the quantum of residential/mixed-use 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. As noted above, although recent data demonstrates that the Lower Wye in Monmouthshire is no longer a failing SAC, the P load of RLDP allocations and commitments needs to be determined to evidence whether the RLDP can be implemented without causing P levels to increase above the SAC Assessment target. Budget calculations have, therefore, been undertaken for both the Usk and Wye catchments.
- 3.2. The nutrient budget for each development in each year of the Plan period has been calculated based on agreed data and assumptions<sup>14</sup>. This information has been used to generate a cumulative budget for each proposed development which would require mitigation throughout the course of the implementation of the RLDP. This will inform the future delivery of any potential strategic mitigation solutions.

#### Cumulative Nutrient Budgets within the Usk and Wye SAC Catchments

- 3.3. Full details of the cumulative nutrient budget associated with the RLDP allocations and commitments in the Usk and Wye catchments are set out in the appended Technical Note prepared by AECOM (Appendix 4). An overview of the final nutrient budget for each catchment is provided in the table below, with worst-case<sup>15</sup> and best-case scenarios<sup>16</sup> set out. This demonstrates that in both cases the proposed development proposals in the RLDP result in the generation of a limited amount of residual excess phosphorus, with higher levels in the Usk catchment reflecting the amount of development proposed in this catchment.
- 3.4. The calculated nutrient budgets for the proposed RLDP have been compared with what the final nutrient budgets would have been in the absence of DCWW phosphorus removal upgrades which are being rolled out to WwTW in the two catchments. This shows that for the Usk catchment the WwTW permit upgrades will have a large impact on the final nutrient budget, mostly due to upgrades at Llanfoist WwTW. The ongoing and proposed interventions to address phosphorus levels in this catchment will have a significant impact on the existing population and, as a result, water quality in the Usk is expected to improve over the Plan period. All developments in the Wye catchment are served by Monmouth WwTW, which was upgraded in 2023 to improve treatment of TP, and, therefore, there are no additional relevant improvements.

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<sup>14</sup> Informed assumption that 50% of the affordable homes are discounted on the basis that those moving into affordable homes are likely to already be local residents and thus probably reside within the county and the nutrient neutrality catchment area. As such, they do not need to be included in the nutrient budget estimation.

<sup>15</sup> Worst-case scenario includes all housing types with no reduction in occupancy for affordable homes.

<sup>16</sup> Best-case scenario Discounts 50% of affordable homes on the basis that half of allocated affordable homes are provided to local people who are likely to already be living within the nutrient neutrality catchment.

Table 6- Summary Results for the Final Nutrient Budget in each Catchment in 2033

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

Source: AECOM Technical Note, February 2026

## 4. High-level Mitigation Options

- 4.1. The findings of the nutrient budget calculations suggest that mitigation solutions will be needed to address the forecast excess phosphorus loads to the catchments where nutrient neutrality restrictions apply.
- 4.2. At this stage, a range of high-level mitigation options have been considered and are set out in the appended Technical Note. These include:
  - Arable land conversion to less nutrient intensive land use
  - PTP upgrades
  - Treatment wetland SuDS
  - SuDS
  - Water usage
- 4.3. Detailed mitigation options will be further considered to determine the most appropriate measures for the proposed sites in the affected catchments, taking into consideration the level of residual phosphate and whether it would have a significantly adverse impact on the integrity of the SAC MCC will continue to liaise with site promoters to explore appropriate mitigation options, including on-site measures. Consideration will also be given to the on-going mitigation work being progressed by the NMBs, including whole catchment options. This will be considered as part of the additional scope of works to be completed by the end of April 2026 and this Position Paper will be updated accordingly.
- 4.4. As noted above, NRW has confirmed that as of March 2025 the Lower Wye in Monmouthshire is no longer failing for phosphorus and as such, development restrictions on neutrality can be lifted in this part of the water body<sup>17</sup>. Notwithstanding this, NRW has advised MCC to consider whether the proposed future development in the Wye catchment can be delivered without the river reverting to failing status. This will be considered as part of the additional scope of works and will inform whether nutrient neutrality restrictions will need to be applied to the Lower Wye catchment. NRW will be consulted further on this to agree a suitable method for the additional investigation. Ensuring that future development is compliant with the objectives of the Water Environment (WFD) (England and Wales) Regulations 2017 (WER) is also important. A similar situation may occur in the Usk catchment following the proposed phosphorus removal upgrades, although this is not yet evident in current monitoring data. This situation will be monitored over the Plan period.

### Viability Implications

- 4.5. A Preliminary Financial Viability Report (September 2024) (SD86) was undertaken to support the Deposit Plan. This included a County-wide viability assessment used to inform the proposed policies within the Plan, with a particular focus on the financial viability of affordable housing provision and other Section 106 obligations. An Addendum Update to the 2024 Preliminary Viability Report (July 2025) (SD87) has been prepared which reviews the updated financial viability assessments (FVAs) submitted by site promoters for residential and/or mixed-use allocations in the Deposit RLDP.
- 4.6. The addendum acknowledges that each FVA incorporates a viability buffer of approximately £12,000 per dwelling to cover additional costs that were not factored into the FVAs. This buffer reflects the fact that average house prices have increased at a faster rate than build

<sup>17</sup><https://naturalresources.wales/about-us/news-and-blogs/news/new-water-quality-data-sheds-light-on-health-of-wales-s-waters/?lang=en>

costs since the assessments were undertaken in 2024. Therefore, although the site-specific FVAs do not explicitly include allowances for potential phosphorus mitigation measures, this overall viability buffer is expected to be capable of absorbing such costs. Further consideration will be given to the likely costs of mitigation and any implications for the viability of site allocations as part of the additional work in relation to potential mitigation solutions. At this stage the Council is confident that any mitigation solutions on the impacted sites would not have an adverse impact on the viability of the sites to warrant exclusion from the RLDP.

## 5. RLDP Policy Framework

- 5.1. As discussed throughout this paper, the position relating to the Usk and Wye SAC catchments is an evolving situation reflecting ongoing consideration of the issue by the Council, NMBs, NRW, DCWW and other relevant parties. Having regard to this and the findings of this paper and its accompanying Technical Note, amendments to the RLDP policy framework are considered necessary to provide overarching policy coverage in relation to the consideration of effects of development proposed within the Wye and Usk SAC catchments. An additional criterion is therefore proposed to be added to Policy NR3 – Protection of Water Sources and the Water Environment. This requires development to demonstrate that there are no adverse effects on the integrity of the nutrient sensitive protected site in question and where it is appropriate to do so, development will be required to achieve nutrient neutrality with potential mitigation. The suggested policy word changes are provided below.
- 5.2. A Chief Planning Officer (CPO) letter from WG is expected imminently which will provide updated guidance for local planning authorities on addressing nitrates in affected SACs. This guidance will need to be taken into account and as such the Council's policy approach may evolve to reflect this. Any revisions will be set out in the updated Position Paper.

### 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 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; and
- d) Can be demonstrated that there is no adverse effect on the integrity of nutrient sensitive protected sites. Where appropriate, development will be required to achieve nutrient neutrality.

- 5.3. In addition to the suggested changes to policy NR3, the supporting text and relevant site allocation policies will need to be updated to clarify that water quality will need to be considered and whether any potential mitigation is required. It is also proposed to develop Supplementary Planning Guidance (SPG) to provide further clarification on the

implementation of the revised water quality policy. This will be added to the schedule of SPG preparation set out in Appendix 11 of the RLDP. These additional changes will be set out in a schedule of proposed RLDP changes and provided as part of the additional scope of works to be completed by the end of April 2026.

### Planning Application Process

- 5.4. MCC ensures that development proposals are determined in accordance with the above proposed planning policy within the RLDP and overarching duties that arise from the Habitats Directive, the Conservation of Habitats and Species Regulations 2017, and updated Natural Resources Wales (NRW) guidance. Under Regulation 63 of the Habitats Regulations, MCC undertake a *screening assessment* to determine whether the development could have a likely significant effect on the SAC.
  - If it is concluded that there *no likely significant effect*, the application can be screened out.
  - If the Council cannot rule out an effect, MCC will carry out a full Appropriate Assessment (AA) and consult NRW further before making a decision.
- 5.5. For proposals with potential nutrient impacts, MCC completes a detailed AA that examines:
  - The development's phosphate load, taking into consideration existing land and utilising the all-Wales phosphate calculator.
  - Whether there is sufficient capacity ("headroom") at the receiving Wastewater Treatment Works (WwTW) to avoid increased nutrient loading. NRW evidence confirms that, in Monmouthshire, existing WwTWs may offer limited operational headroom but require case-by-case assessment.
  - Whether the proposal, alone or in combination with other development, would harm the integrity of the SAC.

Only where the AA demonstrates no adverse effect on the SAC's integrity can planning permission be granted.
- 5.6. If the development does cause a residual increase in phosphorus, consideration is then given to whether secured and deliverable mitigation measures are available to evidence neutrality or betterment. Mitigation may include:
  - Use of WwTW permit headroom (where NRW confirms this is environmentally acceptable).
  - Developer-led or catchment-level interventions that genuinely reduce or offset phosphorus, without undermining long-term restoration measures.
  - On-site SuDS features designed to reduce nutrient runoff, which MCC notes can be effective if properly designed and maintained.

Planning permission can only be granted where MCC is satisfied that development will not, now or in future, undermine the SACs achieving or maintaining favourable conservation status. Development proposals within failing SAC river catchments will only be considered acceptable when it can be robustly demonstrated that it will not compromise the recovery of the SAC in accordance with the now proposed amended Policy NR3 (above) of the RLDP.

## 6. Next Steps and Further Work

- 6.1. This paper covers the initial stages of work requested by the inspectors to address the effect of proposed development in the RLDP on the riverine SACs in relation to the discharge of phosphorus. Having regard to the findings of this initial work, additional work will be required to fully address the inspectors' requirements. This will involve:
- Consideration of whether the proposed future development in the Lower Wye catchment can be delivered without the river reverting to failing status and the implications of this on nutrient neutrality restrictions and the need for any mitigation.
  - Development of potential suitable on-site and/or off-site mitigation measures to avoid or reduce adverse effects on the SACs.
  - Preparation of an Action Plan for the implementation of the potential mitigation measures to demonstrate the deliverability of these measures.
  - Updates to the HRA, including consultation with NRW.
  - Updates to the RLDP policy framework, including the Infrastructure Delivery Plan (IDP) Background Paper.
- 6.2. It is important to note that the way in which nutrient neutrality is mitigated in Wales is a dynamic space at present and any approach will need flexibility to adapt and adjust to changes policy positions taken by WG/NRW. As agreed with the inspectors, this additional work will be completed by the end of April 2026. This paper will be updated to reflect the outcome of this additional work programme.

## **Appendix 1: AECOM Technical Note on the Monmouthshire RLDP 2018-2033 Nutrient Budget Calculations for the Usk and Wye Catchments**

**To:** Rachel Lewis, Monmouthshire County Council

**CC:** n/a

By e-mail

**Project name:** Monmouthshire rLDP  
**Nutrient Budget Calculations for the Usk and Wye Catchments**

**Project ref:** FINAL

**From:** AECOM

**Date:**  
February 17th 2026

# Monmouthshire RLDP 2018-2033 – Nutrient Budget Calculations for the Usk and Wye Catchments

## Introduction

Monmouthshire County Council (MCC) received correspondence from the Inspectors examining the Replacement Local Development Plan (rLDP) requesting further information to address the issue of the effect of proposed development on riverine SACs in respect to the discharge of phosphorus. A copy of this letter is provided in Appendix A but in summary it requires:

- a. Further information on the potential increase in nutrient loading from implementation of the rLDP.
- b. Further information on the approach to mitigation on a 'year by year' and catchment basis.
- c. Details of the steps being taken to implement mitigation measures and how they will be secured.
- d. Consideration of the recent judgement of *CG Fry & Sons Ltd v SSHCLG* [2025] UKSC 35, which relates to committed developments and identify any assumptions made in relation to windfall allowances.
- e. Consideration of whether nutrient contributions from non-residential development need to be considered.

This interim technical note details how the potential increase in nutrient loading from implementation of the rLDP 'year by year' was determined (points (a) and (b) above) for the Usk and Wye catchments only. The technical note also provides a high-level review of mitigation options (point (c) above), the approach to non-residential development (point (e) above) and consideration of the Fry judgment (point (d) above).

## Background to Nutrient Neutrality

In many designated estuarine and freshwater habitats sites across the UK, poor water quality due to nutrient enrichment is one of the main reasons for sites being in an unfavourable condition. Excessive levels of nutrients can cause the rapid growth of certain plants through the process of eutrophication. This in turn can lead to reduced biodiversity, and the condition of a site being considered 'unfavourable'. To improve the water quality in these sites, reductions in nutrients are required. As such, and in line with rulings from the European Court of Justice in combined cases C-923/17 and C294-17 (the Dutch Nitrogen case), any new development within affected habitats site catchments that could increase nitrogen and phosphate deposition into the protected sites above consented levels must show that they are 'nutrient neutral'. Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017<sup>1</sup> an LPA (competent authority) cannot legally consent a plan or project that will have an adverse effect on the integrity of any European protected nature conservation site.

These nutrient neutrality requirements for new development now apply in many areas of the country, including the catchments of the River Wye Special Area of Conservation (SAC) and the River Usk SAC. AECOM has experience providing technical support to Local Planning Authorities (e.g. Carmarthenshire County Council, Dorset County Council)

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<sup>1</sup> The Conservation of Habitats and Species Regulations 2017 [Online]. Available at:  
<https://www.legislation.gov.uk/uksi/2017/1012/contents>

and undertaking nutrient neutrality assessments (NNA) in a number of affected catchments across Wales and England, including the Carmarthen Bay and Estuaries SAC, Somerset Levels and Moors Ramsar site, River Camel SAC, Stodmarsh SAC/Ramsar, Chesil and the Fleet SAC/Special Protection Area (SPA), River Axe SAC, Teesmouth and Cleveland Coast SPA/Ramsar, Poole Harbour SPA/Ramsar, River Avon SAC, River Wensum SAC, the Broads SAC, River Derwent and Bassenthwaite Lake SAC and River Eden SAC.

One way that the potential impact of new development can be determined is by using nutrient neutrality calculations to create a nutrient budget. A calculation methodology covering both nitrogen and phosphorus has been developed by the Welsh Government. Individual county councils have in some cases also produced calculators for calculating total phosphorous (TP) nutrient budgets. For Monmouthshire, the standard Nutrient Budget Calculator for Wales is adopted.

### Monmouthshire Replacement Local Development Plan 2018-2033

In the Infrastructure Delivery Plan, Background Paper (Updated October 2025)<sup>2</sup> the Council sets out in brief how they are planning to deal with an increase in phosphorus emissions from new development. The Council has been working collaboratively with Natural Resources Wales (NRW), Dŵr Cymru Welsh Water (DCWW), Welsh Government, the development industry and their biodiversity officers to find solutions to enable growth and allocate sites through the RLDP process that do not harm the environmental capacity of watercourses in their area. Dŵr Cymru Welsh Water (DCWW) has recently upgraded in 2023 the phosphorus stripping capacity of Monmouth WwTW reducing contributions in the River Wye catchment and prioritised improvement works at the Llanfoist WwTW serving Abergavenny (benefitting the River Usk catchment) by the end of 2025. This was in addition to an initial investment of £100m in phosphorous reduction within their previous AMP7 (2020-2025) as well as further investment proposed throughout the AMP8 (2025-230) period. This investment will significantly reduce the amount of phosphates entering the water environment from the treatment works, providing environmental improvement and reducing the impact from new development. However, it will not eliminate all increases in phosphorous from future development and thus additional mitigation will be required to ensure that development proposed in the RLDP is nutrient neutral in terms of phosphorous.

## Budget Calculations

The nutrient budget for all allocated and committed developments in the Usk and Wye SACs was undertaken using the Wales Nutrient Budget Calculator<sup>3</sup>. This calculator is used to determine phosphorous and nitrogen mitigation requirements for development within the catchments of affected SAC rivers and marine water bodies. It covers the River Wye and River Usk catchments which are within Monmouthshire. Developments in both the River Wye and Usk are only required to mitigate for phosphorous.

There are a total of nine allocated developments in the Usk SAC catchment (HA1, HA5, HA10, HA11, HA12, HA14, HA15, HA16, and HA17) and four allocated or committed developments in the Wye SAC catchment (HA4, HA6, HA7, HA8) and the committed development West of Rockfield Road (DC/2017/00539). MCC provided the following data for these developments:

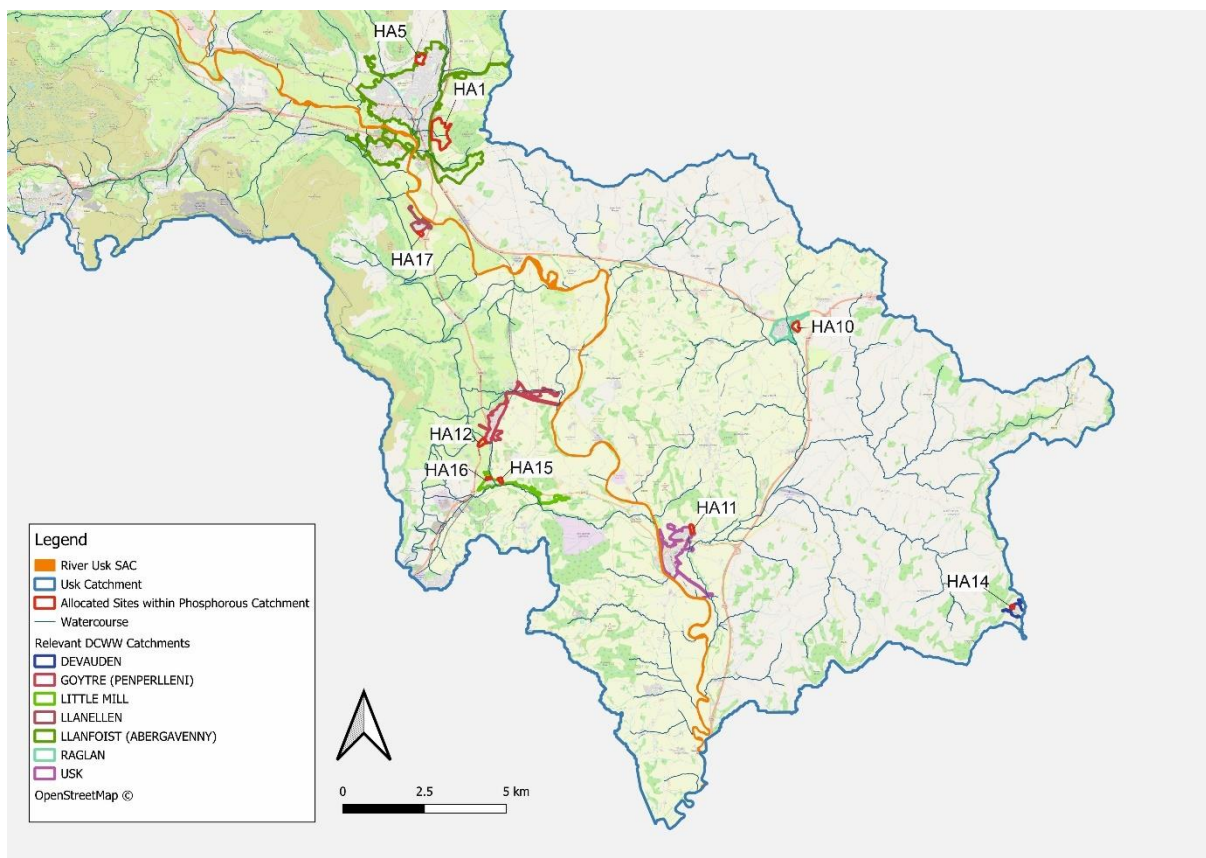
- SAC nutrient neutrality catchment area (shapefile).
- Proposed allocated and committed site locations (shapefile), total site areas (hectares), current land use and number of dwellings per development including occupancy.
- The number of dwellings to be completed in each year of the RLDP (2025-2033).
- The proportion of open market dwellings and affordable homes per development.
- The proportion of each development expected to be Green Infrastructure and / or SuDS.
- The relevant WwTW that will serve the development and WwTW catchment areas (shapefile).
- Current and future permit limits of the relevant WwTW.

The initial data provided for allocated and committed sites by MCC is detailed in Appendix B, and Figure 1 and Figure 2 show the location of each allocated site in relation to the Usk and Wye SAC nutrient neutrality catchments and DCWW WwTW areas, respectively.

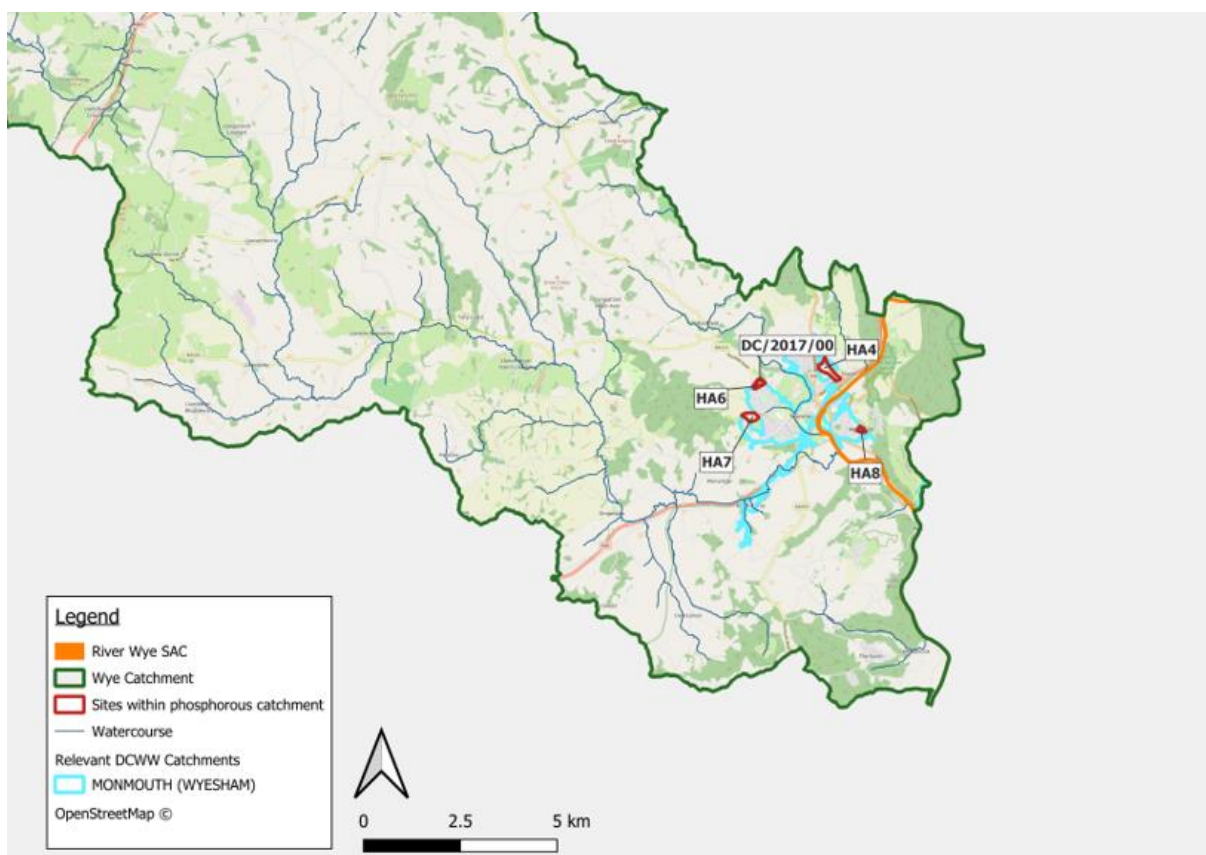
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<sup>2</sup> Infrastructure Delivery Plan, Background Paper [ Online]. Available at: <https://www.monmouthshire.gov.uk/app/uploads/2025/10/SD104-Infrastructure-Delivery-Plan-Background-Paper-Updated-October-2025.pdf>

<sup>3</sup> [Nutrient budget calculator | GOV.WALES](#)



**Figure 1 Usk SAC and Nutrient Neutrality Catchment Area**



**Figure 2 Wye SAC and Nutrient Neutrality Catchment Area**

This data was used to calculate the nutrient budget for each development in each year of the rLDP as required by the Inspectors. This was then used to create a cumulative budget taking into account WwTW upgrades and phosphorous

stripping. The final nutrient budget will require mitigation throughout the course of the rLDP, which will inform future delivery of any strategic mitigation solutions should MCC consider that approach.

## Affordable Homes

There was some uncertainty regarding how occupation of affordable homes should be included in the budget. Welsh Government guidance indicates that on a precautionary basis it is acceptable to estimate the maximum % of occupants which might represent new residents to the catchment<sup>4</sup>. It is accepted that those moving into affordable homes are likely to already be local residents and thus probably reside within the county and the nutrient neutrality catchment area. Thus, they are already present in the baseline and do not need to be included in the nutrient budget estimation. As there is a requirement for 50% of development to be for affordable homes, this is potentially an important consideration when estimating the overall nutrient budget for each allocated site.

MCC undertook a review of Homesearch data for new build affordable homes in Monmouth and Abergavenny over the last two years and concluded that approximately 50% of these homes were allocated to people already living in the local area.

This value is an informed assumption, but adopting a precautionary principle, two different housing scenarios have been assessed. The worst-case scenario in terms of excess TP generated by each allocated site does not include any reduction in occupancy for affordable homes. The best-case scenario includes all open market homes and 50% of the affordable homes (i.e. it ignores wastewater from 50% of the affordable homes on the basis that those occupying them already reside in the nutrient neutrality catchment).

## Additional Phosphorous from Wastewater

In order to calculate the additional phosphorous generated by wastewater from the allocated site developments the following data is required for the Wales Nutrient Neutrality Calculator:

- **SAC Catchment** – Provided by MCC.
- **Postcode** – Inferred using the relevant Candidate Sites Assessment Proforma<sup>5</sup> for the development and identifying the closest postcode to the site. The postcode is used to automatically update the site characteristics including average annual rainfall.
- **Number of dwellings** – Data provided by MCC. The number of dwellings was phased over the period of the rLDP, so the number of dwellings completed in each year was input into the calculator.
- **Occupancy** – The Welsh Calculator automatically uses an LPA specific occupancy rate based on the postcode for the development. This value is 2.27 for Monmouthshire. An alternative option was considered where it is assumed that each bedroom within the development will be occupied by one person, but this results in a higher occupancy value than the default and would not be representative of average occupancy rates throughout the region.
- **Water usage** - This is set to a default of 120 litres/person/day which is 10 litres higher than the Building Regulations standard set by the Welsh Ministers of 110 litres/person/day of wholesome water where a dwelling/unit is erected. The standard is based on a 'fittings approach' where water efficiency compliance is achieved through water efficient fittings. The extra 10 litres/person/day is a precautionary approach to account for water usage variations and account for any potential future changes to the water fittings in perpetuity.
- **Waste Water Treatment Works** – Identification of the wastewater treatment works the development would be served by is required. This was provided by MCC along with details of any upgrades that will take place during the rLDP period.

The wastewater nutrient loading of each allocated site development is then calculated based on these inputs. This process was then repeated for each year of the rLDP.

## Surface water discharges from development

NRW's advice to planning authorities for planning applications affecting nutrient sensitive SAC's states that for the purpose of nutrient balance calculations, surface water discharges do not need to be considered as a source of nutrients. This is based on the presumption that for all developments, rainwater is kept separate from foul wastewater and discharged in line with planning guidance on rainfall disposal. This means that water discharges should not be contaminated with foul water or pollutants (i.e. the assumption is the SuDS will remove 100% of the phosphorous in the runoff)<sup>6</sup>. Based on this guidance the surface water loads generated by developments due to change in land use have not been included in the calculations and final nutrient budget, despite this option being available in the calculator.

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<sup>4</sup> [Planning Guidance - Development in SAC Rivers](#)

<sup>5</sup> [RLDP Submission - Monmouthshire](#)

<sup>6</sup> [Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#)

## WwTW Upgrades

Several WwTW within the affected catchments, most notably Llanfoist (Abergavenny) and Goytre within the Usk Catchment, have proposed permit limit upgrades which will reduce the wastewater loading within the catchment. Other key WwTW's, including Monmouth in the Wye catchment and Raglan in the Usk catchment have already implemented P stripping in the previous AMP7 cycle but have no proposed upgrades to P treatment during the rLDP period. These reductions in the permit limits of key WwTW will reduce the existing wastewater loads entering the catchment. However, nutrient neutrality restrictions require that all developments in the affected catchments must demonstrate nutrient neutrality. In AMP8 (2025-2030) DCWW are investing over £9 million to improve treated effluent quality in multiple WwTWs in the Usk catchment including Usk, Little Mill and Llanellen as part of their Sanitary Determinants programme (Ammonia, Biological Oxygen Demand and Suspended Solids). This is also the case in the Wye catchment where £4 million is being invested as part of the sanitary determinants programme (including at Monmouth WwTW). However, further improvements to P permit limits are not proposed at these WwTW's.

## CG Fry & Sons Ltd v SSHCLG [2025] UKSC 35

The judgment of this case means that appropriate assessment may be required at reserved matters or discharge of condition stage for any development that was granted outline permission before decision makers were aware of the nutrient impacts to the SAC. The nutrient budget estimates presented here are based on development information provided to us by Monmouthshire County Council and include several developments which already have outline planning permission, thus being in accordance with this recent caselaw.

## Assessment Scenarios

Reflecting assumptions that need to be made at this stage, two scenarios have been assessed to provide a range of potential outcomes to support decisions regarding future mitigation approaches. It is recommended that the assumptions used and the scenarios tested are kept under review and are revisited if more data becomes available. The current scenarios evaluated as part of this assessment are as follows:

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

## Final Nutrient Budget and Results

The TP budget is calculated automatically once all required inputs have been entered into Stage 1, Stage 2 and Stage 3 of the calculator.

- **Stage 1** – Calculates the nutrient wastewater loading of a development based on the number of properties, occupancy rate, water usage and WwTW permit.
- **Stage 2** – Calculates the baseline surface water nutrient loading from the development due to its current land use.
- **Stage 3** – Calculates the future wastewater nutrient loading based on the proposed future land use of the developed site.
- **Stage 4** – Calculates the overall nutrient budget plus an additional 20% buffer.

The calculation involves adding the values from Stage 1 and Stage 3 and then subtracting the values from Stage 2. A 20% precautionary buffer is then added to the result. This calculation is completed automatically in the Stage 4 worksheet. This can be summarised as:

$$(Stage\ 1 - Stage\ 2 + (Stage\ 3)) * 1.2 = Stage\ 4$$

Based on NRW guidance the final nutrient budget only includes the Stage 1 wastewater loading and a 20% buffer. This value is the residual TP taking account of upgrades at WwTW. Results are presented for each year of the rLDP.

## Usk Catchment Results

### Scenario 1 (Worst-Case Scenario)

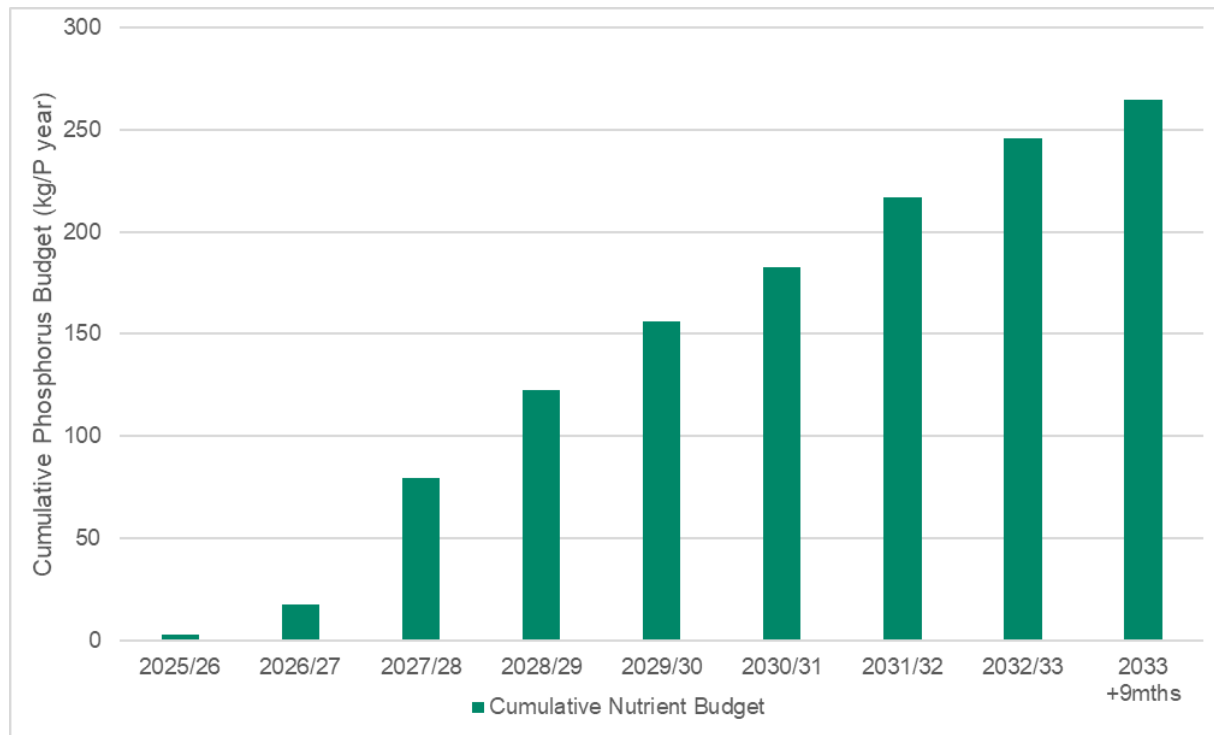
The results for the worst-case scenario for the Usk catchment are displayed in Table 1.

**Table 1 Cumulative Nutrient Budgets within the Usk SAC Catchment (kg TP/year) – Scenario 1 (Worst-Case Scenario)**

| Site ID                                 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033 +9mths |
|-----------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------------|
| HA1                                     | 0.00    | 0.00    | 0.00    | 16.72   | 38.21   | 59.70   | 81.19   | 102.68  | 119.40      |
| HA5                                     | 0.00    | 0.00    | 11.94   | 23.88   | 23.88   | 23.88   | 23.88   | 23.88   | 23.88       |
| HA10                                    | 0.00    | 0.00    | 4.78    | 6.44    | 6.44    | 6.44    | 6.44    | 6.44    | 6.44        |
| HA11                                    | 0.00    | 5.96    | 23.87   | 23.87   | 23.87   | 23.87   | 23.87   | 23.87   | 23.87       |
| HA12                                    | 0.00    | 0.00    | 17.90   | 25.07   | 25.07   | 7.02*   | 7.02*   | 7.02*   | 7.02*       |
| HA14                                    | 0.00    | 0.00    | 0.00    | 5.96    | 11.93   | 11.93   | 11.93   | 11.93   | 11.93       |
| HA15                                    | 0.00    | 2.99    | 11.94   | 11.94   | 11.94   | 11.94   | 11.94   | 11.94   | 11.94       |
| HA16                                    | 2.99    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95        |
| HA17                                    | 0.00    | 0.00    | 0.00    | 0.00    | 5.96    | 15.52   | 15.52   | 15.52   | 15.52       |
| Windfall 1 (Abergavenny)                | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 7.15    | 14.30   | 21.46   | 23.84       |
| Windfall 2 (Rural Secondary Settlement) | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 5.96    | 11.93   | 11.93   | 11.93       |
| <b>Total Cumulative</b>                 | 2.99    | 17.90   | 79.38   | 122.83  | 156.25  | 182.36  | 216.97  | 245.62  | 264.72      |

\*new WwTW permits apply from 2030/31 onwards hence the reduction in TP load.

These results are a cumulative nutrient budget which reflect the current proposed phasing of the proposed developments across the rLDP. As more houses are completed, the phosphorous budget requiring mitigation in that year also increases. In some cases, the permit limit of the relevant WwTW will be reduced during the rLDP period, which will reduce the nutrient budget of the development as more of the P load in the wastewater will be removed. However, this was only the case for one development in the Usk catchment (HA12). The results are displayed in Figure 3.



**Figure 3 Usk Catchment Cumulative Nutrient Budget Scenario 1 (Worst Case Scenario)**

The total nutrient budget for phosphorous in the Usk catchment increases year on year throughout the RLDP period and is a maximum value of 265 kg TP/year in 2033. The largest contribution to this nutrient budget is the HA1 development in Abergavenny.

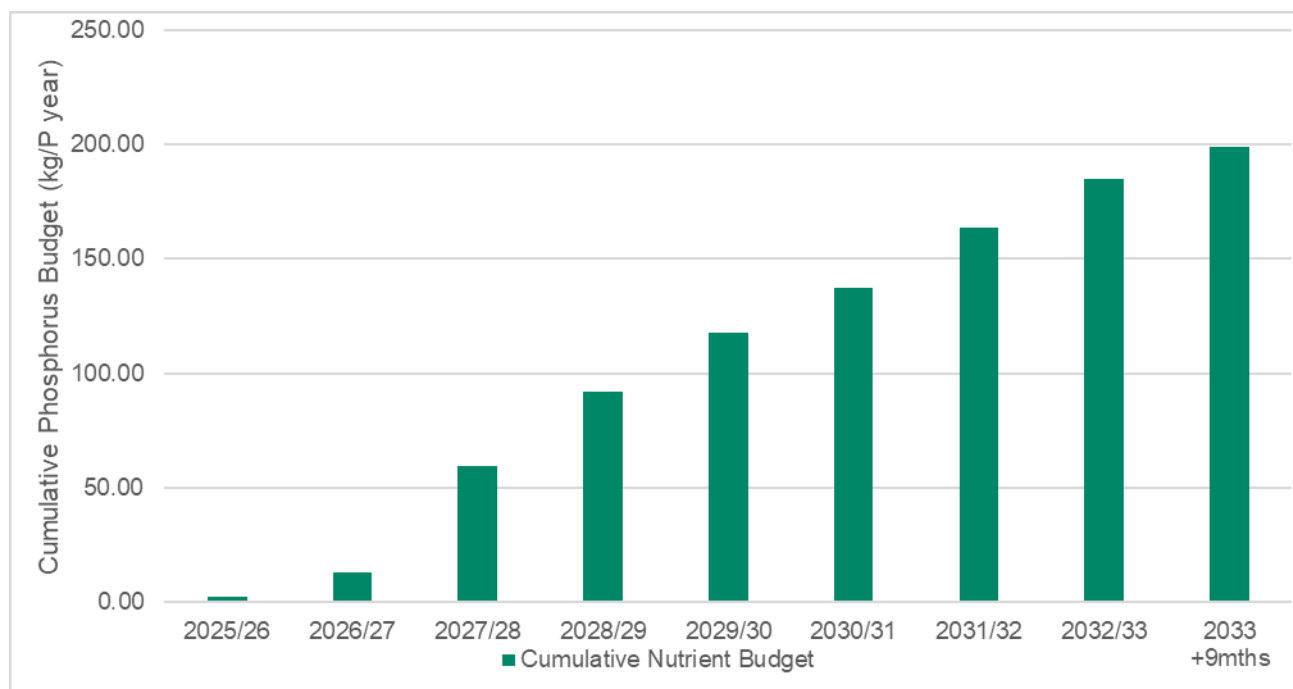
### Scenario 2 (Best-Case Scenario)

The results for the best-case Usk catchment scenario which includes all the open market homes but only 50% of affordable homes for the reasons described earlier are shown in Table 2.

**Table 2 Cumulative Nutrient Budgets within the Usk SAC Catchment (kg TP/year) – Scenario 2 (Best-Case Scenario)**

| Site ID          | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033 +9mths |
|------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------------|
| HA1              | 0.00    | 0.00    | 0.00    | 12.42   | 28.66   | 44.89   | 61.13   | 77.12   | 89.54       |
| HA5              | 0.00    | 0.00    | 9.07    | 17.90   | 17.90   | 17.90   | 17.90   | 17.90   | 17.90       |
| HA10             | 0.00    | 0.00    | 3.58    | 4.88    | 4.88    | 4.88    | 4.88    | 4.88    | 4.88        |
| HA11             | 0.00    | 4.18    | 17.90   | 17.90   | 17.90   | 17.90   | 17.90   | 17.90   | 17.90       |
| HA12             | 0.00    | 0.00    | 13.73   | 19.10   | 19.10   | 5.35    | 5.35    | 5.35    | 5.35        |
| HA14             | 0.00    | 0.00    | 0.00    | 4.18    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95        |
| HA15             | 0.00    | 2.39    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95    | 8.95        |
| HA16             | 2.39    | 6.56    | 6.56    | 6.56    | 6.56    | 6.56    | 6.56    | 6.56    | 6.56        |
| HA17             | 0.00    | 0.00    | 0.00    | 0.00    | 4.78    | 11.94   | 11.94   | 11.94   | 11.94       |
| Windfall 1       | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 5.50    | 10.99   | 16.49   | 18.16       |
| Windfall 2       | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 4.78    | 8.95    | 8.95    | 8.95        |
| Total Cumulative | 2.39    | 13.13   | 59.80   | 91.91   | 117.70  | 137.62  | 163.52  | 185.02  | 199.10      |

In this scenario, the total cumulative budgets year-on-year are lower with a final nutrient budget for the whole catchment of 199 kg TP/year. The largest contribution still arises from the HA1 development. Figure 4 presents the cumulative nutrient budgets for all Usk catchment developments across each year of the rLDP, for the best-case scenario.



**Figure 4 Usk Catchment Cumulative Nutrient Budgets for all Developments by Year of the rLDP Scenario 2 (Best-Case scenario)**

## Wye Catchment Results

### Scenario 1 (Worst-Case Scenario)

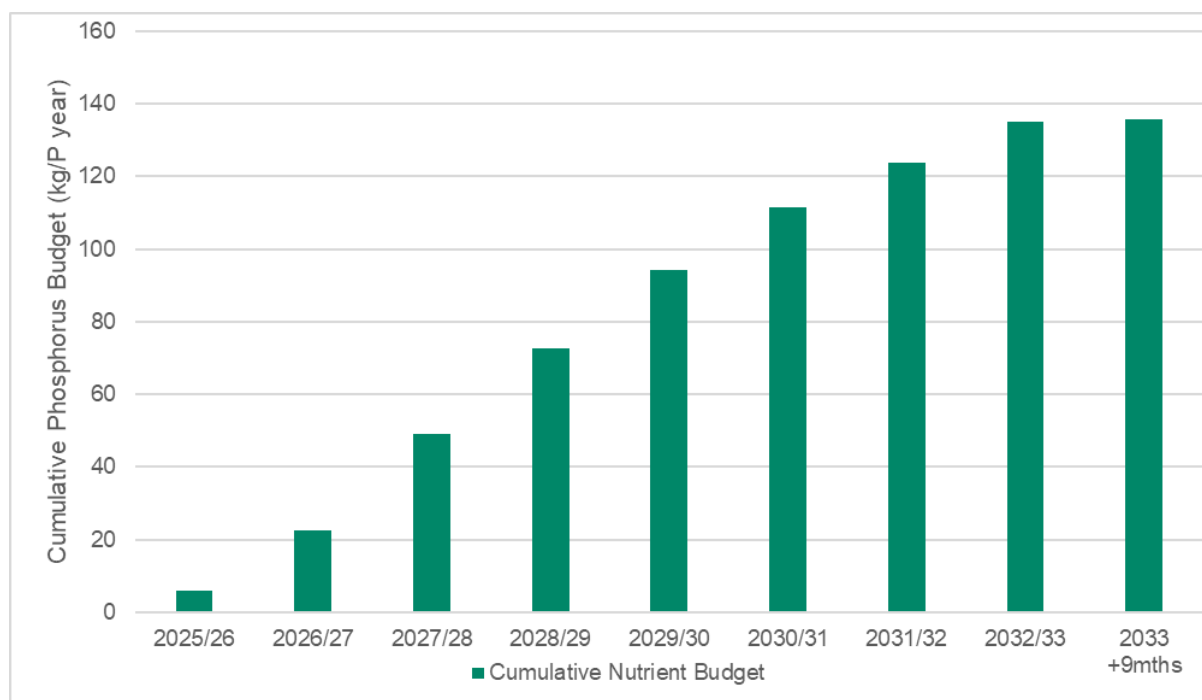
The results for the worst-case scenario for the Wye catchment are displayed in Table 3.

**Table 3 Cumulative Nutrient Budgets within the Wye SAC Catchment (kg TP/year) – Scenario 1 (Worst-Case Scenario)**

| Site ID                 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033 +9mths |
|-------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------------|
| HA4                     | 0.00    | 0.00    | 5.96    | 17.90   | 29.84   | 41.78   | 53.72   | 64.46   | 64.46       |
| HA6                     | 0.00    | 0.00    | 0.00    | 0.00    | 9.55    | 14.33   | 14.33   | 14.33   | 14.33       |
| HA7                     | 0.00    | 2.39    | 14.33   | 26.27   | 26.27   | 26.27   | 26.27   | 26.27   | 26.27       |
| HA8                     | 5.96    | 11.93   | 11.93   | 11.93   | 11.93   | 11.93   | 11.93   | 11.93   | 11.93       |
| West of Rockfield Rd    | 0.00    | 8.35    | 16.70   | 16.70   | 16.70   | 16.70   | 16.70   | 16.70   | 16.70       |
| Windfall                | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.48    | 0.96    | 1.44    | 1.92        |
| <b>Total Cumulative</b> | 5.96    | 22.67   | 48.92   | 72.80   | 94.30   | 111.49  | 123.91  | 135.13  | 135.61      |

The total nutrient budget for phosphorous in the Wye catchment increases year on year throughout the RLDP period and is a maximum value of 136 kg TP/year in 2033. The largest contribution to this nutrient budget is the HA4 development in Monmouth.

Figure 5 presents the cumulative nutrient budgets for all Wye catchment developments across each year of the rLDP, under the worst-case scenario.



**Figure 5 Wye Catchment Cumulative Nutrient Budgets for all Developments by Year of the rLDP Scenario 1 (Worst-case scenario)**

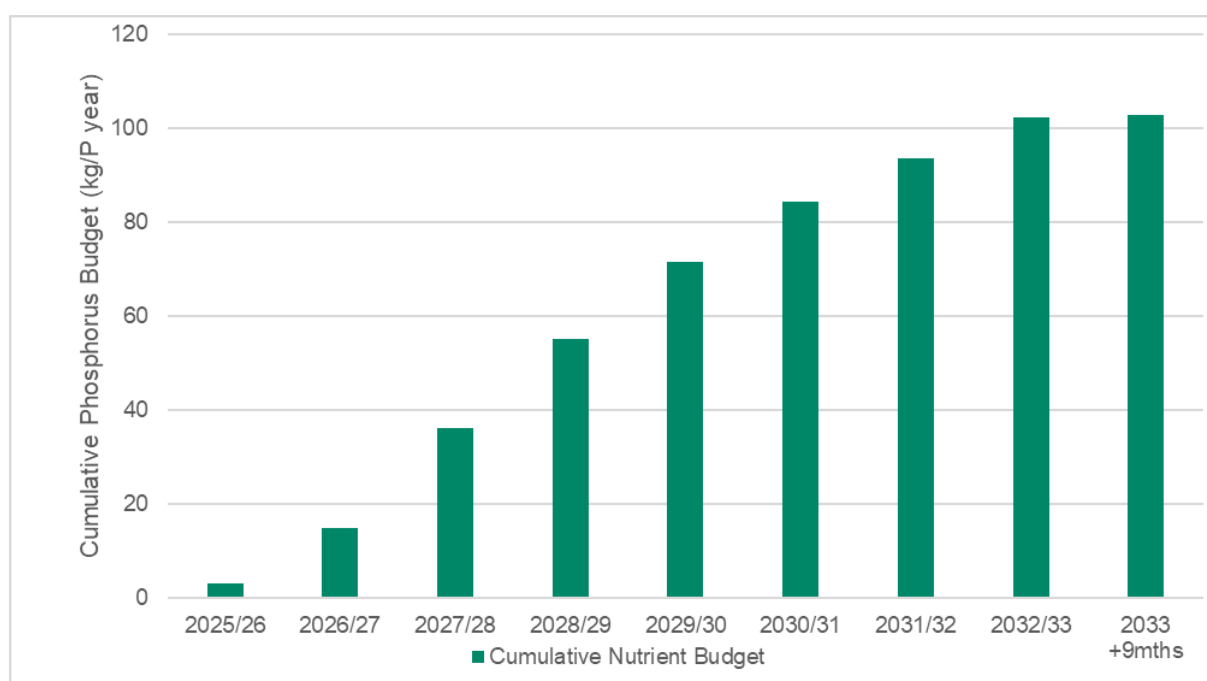
### Scenario 2 (Best-Case Scenario)

The results for the best-case Wye catchment scenario which includes all the open market homes but only 50% of affordable homes based on the reasons described earlier are shown in Table 4.

**Table 4 Cumulative Nutrient Budgets within the Wye SAC Catchment (kg TP/year) – Scenario 2 (Best Case Scenario)**

| Site ID                 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033 +9mths |
|-------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------------|
| HA4                     | 0       | 0       | 4.536   | 13.608  | 22.68   | 31.512  | 40.344  | 48.468  | 48.468      |
| HA6                     | 0       | 0       | 0       | 0       | 7.164   | 10.74   | 10.74   | 10.74   | 10.74       |
| HA7                     | 0       | 2.148   | 11.94   | 21.732  | 21.732  | 21.732  | 21.732  | 21.732  | 21.732      |
| HA8                     | 3.108   | 5.976   | 5.976   | 5.976   | 5.976   | 5.976   | 5.976   | 5.976   | 5.976       |
| West of Rockfield Rd    | 0       | 6.924   | 13.848  | 13.848  | 13.848  | 13.848  | 13.848  | 13.848  | 13.848      |
| Windfall                | 0       | 0       | 0       | 0       | 0       | 0.48    | 0.96    | 1.44    | 1.92        |
| <b>Total Cumulative</b> | 3.108   | 15.048  | 36.3    | 55.164  | 71.4    | 84.288  | 93.6    | 102.204 | 102.684     |

In this scenario, the total cumulative budgets year-on-year are lower with a final nutrient budget for the whole Wye catchment of 103 kg TP/year. The largest contribution still arises from the HA4 development. The final cumulative values for each year of the RLDP are displayed in Figure 6.



**Figure 6 Wye Catchment Cumulative Nutrient Budgets for all Developments by Year of the rLDP Scenario 2 (Best Case Scenarios)**

## Non-residential Development

New development, including housing or agricultural enterprises, can lead to increased loads of nutrients entering the catchments of the Usk and Wye (and hence their respective affected SACs) from additional wastewater or land management<sup>7</sup>. NRW advice regarding nutrient neutrality applies to any development within nutrient neutrality catchments that increases nutrient levels.

It is a matter for the Planning Authority to determine whether a plan or project is likely to have a significant effect on a SAC. In general, key affected developments within a nutrient neutrality catchment include, and are not restricted, to the following<sup>7</sup>.

**Residential development:** New homes or houses which may lead to an increase in occupancy within the nutrient neutrality catchment.

<sup>7</sup> Habitats regulations assessment (HRA) guidance | GOV.WALES (2025). Available at: <https://www.gov.wales/habitats-regulations-assessment-hra-guidance> (Accessed: 8 January 2026).

**Domestic extension with increased occupancy / change in use:** Domestic extension that will lead to the creation of independent living accommodation as a separate planning unit may lead to an increase in occupancy by residents from outside a nutrient neutrality catchment.

**Non-residential development:** Developments expected to serve a population from outside of a nutrient neutrality catchment who are not already served by residential connections to existing public or private sewers discharging within the nutrient neutrality catchment. For example, this can include self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites. New commercial or industrial developments, such as conference facilities, large retail sites or major tourist attractions may also result in the release of additional nutrients to the system.

**Temporary events:** Sites with planning consent to hold frequent seasonal events or activities on a long-term basis should be considered permanent development. These include, but are not restricted to, seasonal wedding venues, touring caravan parks and outdoor activity venues.

**Developments involving wastewater connections:** Any proposal that connects to public WwTW or uses Package Treatment Plants (PTPs) within a nutrient neutrality catchment.

**Agricultural:** New agricultural developments involving the production, storage, management and spreading of organic manures and slurries, which have the potential to contribute towards the amount of nutrients entering a designated site. Agricultural development that are not considered to have a likely significant effect on SAC features in relation to water quality impacts include covering an existing yard and roofing for manure / slurry or silage storage that does not impact the existing store structure.

#### **Exemptions and exceptions cited by NRW:**

Any development that improves existing water quality discharges by reducing the nutrient concentration of wastewater without increasing volume, or by decreasing the volume of wastewater produced without increasing the concentration of nutrients.

- Domestic extensions are considered by NRW to provide increased living space within existing properties that may not result in a change in the number of occupants. This is the case provided that the extension will not result in the creation of independent living accommodation, a separate planning unit and/or a change in use.
- Developments using PTPs: Where PTPs can be justified (i.e. it can be shown to the satisfaction of the LPA that connection to a public sewer is not feasible), small discharges to ground (<2 m<sup>3</sup>/day) via a suitable drainage field are considered unlikely to have a significant effect on a SAC. For this to be the case the PTP should be built to the relevant British Standard (BS 6297:2007+A1:2008), the drainage field must be located more than 40 m from any surface water feature such as a river, stream, ditch or drain, located more than 50 m from a SAC boundary, and at least 50 m from any other known discharge to ground<sup>7</sup>.
- Developments intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the nutrient neutrality catchment.
- Community or employment facilities serving an existing local population.
- Certain agricultural improvements with no livestock increase.

## **High Level Review of Mitigation Options**

There are several typical nutrient neutrality mitigation options which could be implemented for developments. These may include Nature Based Solutions such as the creation of wetlands, water efficiency measures and fallowing agricultural land, all of which slow the movement of, and store water, on site allowing physical and biogeochemical processes to permanently remove nutrients. Some of the more common and relevant mitigation options are described below and further examples of treatment efficiencies provided within Table 5. As part of the high-level review of mitigation options, estimates have been made to give an indication of the scale of each mitigation that would be required to fully mitigate the nutrient budgets calculated for the rLDP. These are only examples based on assumptions. However, they are useful to put the scale of mitigation needed into context.

**Arable land conversion to less nutrient intensive land use:** This could include converting nutrient intensive agricultural land to woodland, grassland or natural wetlands. However, this method of mitigation would require a significant area of land to offset the estimated phosphorous loads for development in the Usk and Wye catchments. Therefore, this option may only be applicable for developments with a large amount of land availability or in areas where purchasing additional off-site land for conversion is a financially or technically viable option. It could, however, be used in conjunction with other options to provide partial mitigation through the allocation of some of the site to greenspace,

woodland or other natural habitats. To estimate the mitigation provided by arable land conversion several assumptions were required. For this high-level review of mitigation options, it has been assumed that the site would have slightly impeded drainage, which was the case for most sites assessed and would receive between 1400-1600 mm<sup>8</sup> of rain annually for the Usk and 1100-1200 mm of rain annually for the Wye<sup>9</sup> as per catchment statistics. The current land use has also been assumed to be lowland grazing given that much of the catchment appears to be used for this purpose. Land used for arable farming would likely result in more phosphorus saving.

**Domestic Package Treatment Plants (PTP) upgrades:** Nutrient credits could also be generated by upgrading existing PTP and septic tank units. For example, an applicant proposing new houses could replace septic tanks at existing neighbouring properties, or elsewhere in the catchment. This would require contacting third party properties and coordinating replacements throughout the catchment and may not be viable strategically given the practical difficulties delivering this at a strategic scale. To calculate the potential mitigation provided it has been assumed that existing septic tanks would discharge waste at the concentration levels specified in the nutrient budget calculator for the default septic tank (i.e. 11.2 mgP/l). The upgraded septic tank has been assumed to be a Graf OneAdvanced system with phosphate reduction package. This is a high performing PTP with regards to phosphorus treatment which can achieve effluent concentrations of 0.4 mg/l<sup>10</sup>. This is not an endorsement of the PTP model but gives an indication of the potential treatment efficiencies that could be achieved using a PTP as opposed to a septic tank. If other models are used it may not be possible to achieve the same reductions in phosphorus. It is also important to confirm that any discharge from a PTP to a watercourse or to ground is in fact a discharge to the SAC before an upgrade can be accepted as mitigation.

**Treatment wetlands:** Wetlands can be implemented to capture runoff from agricultural land, receive loads from diverted rivers or treat WwTW effluents. If designed and sited appropriately treatment wetlands can offer some of the best nutrient outcomes per hectare of land. Generally, the greater the nutrient load input into the wetland the greater potential for reduction in nutrients. Wetland design is site specific and dependant on the incoming concentrations and flows from a wastewater treatment plant. However, initial feasibility calculations for potential constructed wetlands elsewhere in South Wales provide an indication of the phosphorous removal that could be achieved, these are discussed in Table 5. It should be noted that phosphorus permits are tighter in the Wye catchment and so the potential for wetlands is less but may still be a suitable option.

**SuDS:** All development within the Usk and Wye catchments will be Sustainable Drainage Approving Body (SAB) compliant and as such the majority, if not all, of the developed site will be routed through SuDS drainage systems which has the potential to reduce phosphorous loads in surface water runoff. Retrofitting SuDS to existing urban land to claim additional mitigation credits is also a potential mitigation option. Retrofitting SuDS could be implemented to capture and treat surface runoff, some of which may also be draining existing urban land to combined sewers and subsequently WwTW. Reducing spills from combined sewers is another similar option, although there are significant issues with evidencing the benefit and this is not recommended.

Most SuDS features can provide an opportunity to remove nutrients from surface water drainage if they are suitably designed and maintained. CIRIA have provided guidance as to how SuDS should be designed to achieve nutrient removal, this information is available in the CIRIA SuDS Manual (C753F)<sup>11</sup>, the CIRIA guidance regarding phosphorous removal (C808F)<sup>12</sup>, and guidance on nitrogen removal using SuDS (C815)<sup>13</sup>. Sustainable Drainage Approving Body (SAB) can ensure that good practice is followed.

To estimate a percentage removal efficiency for the retrofitting SuDS mitigation option several assumptions have been applied to calculate a precautionary value for SuDS phosphorus reductions, and these are listed below:

- Runoff will be discharged to surface watercourses. If surface water is infiltrating there are circumstances where it may not be considered a source to the designated site, in which case the location would not be appropriate for retrofitting SuDS mitigation.
- It has been assumed that there would be one SuDS management train component and that the SuDS systems predominantly used will be swales, detention basins, retention basins and ponds, which are most appropriate for regional site control and discharges to watercourses.
- As stated within the CIRIA C808 (2022) "Using SuDS to reduce phosphorous in surface water"<sup>14</sup> guidance, 55% of phosphorus (P) in surface runoff is typically bound to sediment, and 45% is dissolved P, respectively.

<sup>8</sup> [NRFA station catchment information for 56001 - Usk at Chainbridge](#)

<sup>9</sup> [NRFA station catchment information for 55023 - Wye at Redbrook](#)

<sup>10</sup> [pia\\_oneadvanced\\_10 - 50\\_pe\\_.pdf](#)

<sup>11</sup> [CIRIA SuDS Manual \(C753F\)](#)

<sup>12</sup> [Using SuDS to reduce phosphorus in surface water runoff C808F](#)

<sup>13</sup> [Using SuDS to reduce nitrogen in surface water runoff\(C815\)](#)

<sup>14</sup> [Using SuDS to reduce phosphorus in surface water runoff C808F](#)

- Based on CIRIA C808 (2022) guidance:
  - Swales have 28% P removal from sediment and 0% dissolved P removal.
  - Detention basins have a 28% P removal from sediment and 12% dissolved P removal.
  - Retention basins have a 28% P removal from sediment and 50% dissolved P removal.
  - Ponds have a 38% P removal from sediment and a 50% dissolved P removal.
  - This gives an overall removal for each SuDS system of 15.4% for swales, 20.8% for detention basins, 37.9% for retention basins and 43.4% for ponds, respectively.

For the high-level appraisal of this mitigation option, we have taken a mean TP removal of the above listed SuDS treatment options. Therefore, the average TP removal applied for SuDS drainage for the developments is 29%. However, we note NRW may hold the view that SuDS are more effective and further consultation with them is recommended to define the most appropriate removal percentage that should be applied.

**Water usage:** This relies on the increased efficiency of water in new developments by using higher efficiency fittings and appliances to reduce the average water consumption per capita. If scaled up across all new development this option has the capacity to reduce wastewater loads generated by new development but alone will not fully mitigate the calculated nutrient budgets. Similarly, if water efficiency measures were retrofitted to existing housing stock and properties owned and managed by MCC or suitable third parties, a similar nutrient saving can be achieved. However, this option is only possible where the WwTW has a permit for phosphorus and is operating at 90% of this, as it requires a linear relation between water use and phosphorus load from the WwTW to be established. Securing this mitigation will require these solutions to be maintained in perpetuity.

Examples and estimations of the potential treatment for TP for each mitigation option is provided below in Table 5.

Table 5 Mitigation- High level mitigation option appraisal and potential nutrient reduction estimates

| Arable land conversion to less nutrient intensive land use <sup>15</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | PTP upgrades                                                                                                                                                                                                                                                                                                                                                                                                       | Treatment Wetlands SuDS                                                                                                                                                                                                                                                                                                                                                                                                                          | SuDS Retrofit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Water Usage                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Usk Catchment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Converting lowland grazing land to woodland or greenspace creates a nutrient offset by reducing the nutrient loads in surface water runoff. For the assumed rainfall and soil type in the Usk catchment 1 ha of lowland grazing has a nutrient load of 0.43 kg TP/year and 1 ha of greenspace/woodland has a nutrient load of 0.02 kg TP/year, creating an offset of 0.41 kg TP/year. To mitigate against the calculated nutrient budgets, it is estimated that between 520-650 hectares of land would need to be converted depending on the scenario. | Upgrading one dwelling from the default septic tank to an improved PTP (Graf OneAdvanced system with phosphate reduction package, discussed above) can reduce phosphorous discharges to the environment by around 1.11 kg TP/year. Therefore, to mitigate the calculated nutrient budget it is estimated that between 190 - 240 septic tanks in the catchment would need to be upgraded depending on the scenario. | AECOM is currently working on a wetland concept design project where a treatment area of around 1 ha could potentially remove in the region of 250 kg TP/year with effluent concentrations of 5 mg P/l and average flows of 250 m³/day. Therefore, to mitigate against the range of scenarios calculated for the Usk catchment may require between one or two wetlands of this size treating effluents of similar concentrations <sup>16</sup> . | Retrofitting SuDS to existing urban areas can provide a mitigation benefit by treating surface water flows prior to final discharge. Retrofitting between 350 to 450 ha of urban residential land could provide mitigation for development in the Usk catchment assuming TP removal via SuDS of around 29% can be achieved. However, we note NRW may hold the view that SuDS are more effective and further consultation with them is required, to understand the removal percentage that should be applied. | Taking the largest allocated development in the Usk (HA1) as an example, if a reduced water usage of 100 l/p/d was applied the final nutrient budget in 2033 would reduce to 99.49 kg TP/year and if water usage is reduced further to 80 l/p/d the final nutrient budget would be 79.6 kg TP/year. Compared with the unmitigated and worst-case scenario budget of 119.4 kg TP/year, this represents total reductions of 17% and 33% respectively. There is also potential to retrofit water efficiency measures to existing housing stocks which has the potential to provide mitigation.        |
| Wye Catchment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Converting lowland grazing land to woodland or greenspace creates a nutrient offset by reducing the nutrient loads in surface water runoff. For the assumed rainfall and soil type in the Wye catchment 1 ha of lowland grazing has a nutrient load of 0.27 kg TP/year and 1 ha of greenspace/woodland has a nutrient load of 0.02 kg TP/year, creating an offset of 0.25 kg TP/year. To mitigate against the calculated nutrient budgets, it is estimated that between 410-550 hectares of land would need to be converted depending on the scenario. | Upgrading one dwelling from the default septic tank to an improved PTP can reduce phosphorous discharges to the environment by around 1.11 kg TP/year. Therefore, to mitigate calculated nutrient budget it is estimated that between 90 - 125 septic tanks in the catchment would need to be upgraded depending on the scenario.                                                                                  | AECOM is currently working on a wetland design project where a treatment area of around 1 ha could potentially remove in the region of 250 kg TP/year with effluent concentrations of 5 mg P/l and average flows of 250 m³/day. Therefore, for the Wye catchment a wetland of a similar size could have the capacity to mitigate the nutrient budget.                                                                                            | Retrofitting SuDS to existing urban areas can provide a mitigation benefit by treating surface water flows prior to final discharge. Retrofitting between 210 - 275 ha of urban residential land could provide mitigation for development in the Wye catchment assuming P removal via SuDS of around 29% can be achieved. However, we note NRW may hold the view that SuDS are more effective and further consultation with them is required, to understand the removal percentage that should be applied.   | Taking the largest allocated development in the Wye (HA4) as an example, if a reduced water usage of 100 l/p/d was applied the final nutrient budget in 2033 would reduce to 53.72 kg TP/year and if water usage is reduced further to 80 l/p/d the final nutrient budget would reduce to 42.98 kg TP/year. Compared with the unmitigated and worst-case scenario budget of 64.5 kg TP/year, this represents total reductions of 17% and 33% respectively. There is also potential to retrofit water efficiency measures to existing housing stocks which has the potential to provide mitigation. |

<sup>15</sup> Lowland grazing is the predominant agricultural land use type within both catchments and has therefore been used to evaluate nutrient reductions from a change in land use.

<sup>16</sup> Wetland design is site specific and dependant on the incoming concentrations and flows from a wastewater treatment plant. These values represent an estimate of achievable phosphorous reductions based on a feasibility study AECOM has recently undertaken. Further design and site-specific assessment would be required to determine whether wetlands could be provided to WwTW in the Usk and Wye catchments, and what benefit they might achieve. In this case, 5 mg/l was chosen as the effluent P concentration as there were several WwTW plants in the Usk catchment with this permit limit including the Usk, Little Mill and Llanellen WwTW's. However, if a wetland were to treat effluents from a WwTW with a lower permit limit the treatment benefit would be reduced.

## Summary

The final cumulative nutrient budget for each catchment under both scenarios is presented in Table 6. For both scenarios and both catchments the proposed development allocated in the rLDP results in the generation of excess phosphorus. Significantly more phosphorous requires mitigation in the Usk catchment compared with the Wye, reflecting the quantum of proposed development in each catchment.

The calculated nutrient budgets for the proposed rLDP have also been compared with what the final nutrient budgets would have been in the absence of AMP8 phosphorus removal upgrades, which are being rolled out to WwTW in the two catchments by DCWW. This shows that for the Usk catchment the WwTW permit upgrades will have a large impact on the final nutrient budget, mostly due to upgrades at Llanfoist WwTW. All developments in the Wye catchment are served by Monmouth WwTW, which was upgraded in 2023 to improve treatment of TP. There are additional improvements planned at Monmouth WwTW as part of DCWW's AMP8 Sanitary Determinants Programme but no additional improvements to P treatment are proposed.

**Table 6 Summary results for the final nutrient budget in each catchment in 2033**

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

A number of strategic mitigation options have been considered that can address the forecast excess phosphorus emissions to the Usk and Wye catchments, alone or in combination. There may also be other options that can be considered. Monmouthshire County Council are planning to explore these mitigation options further to determine those that are most suitable and additional information will be made available to Planning and Environment Decisions Wales (PEDW) at a later stage.

It should be noted that NRW have confirmed that as of March 2025 the Lower Wye through Monmouthshire is no longer failing for phosphate<sup>17</sup>. The 2024 interim WFD classifications record a result of 33.9 µg/l of phosphate<sup>18</sup> which is below the target of 39 µg/l. It has been suggested by NRW that Monmouthshire County Council may no longer need to enforce nutrient neutrality restrictions but should still consider whether the proposed future development in the Wye catchment can be delivered without causing deterioration of phosphate concentrations back above the 39 µg/l target standard. NRW will be consulted further on this to agree a suitable method for the additional investigation. Ensuring that future development is compliant with the objectives of the Water Environment (WFD) (England and Wales) Regulations 2017 (WER) is also important. A similar situation may occur in the Usk catchment following the proposed phosphorus removal upgrades, although this is not yet evident in current monitoring data.

<sup>17</sup> [Natural Resources Wales / New water quality data sheds light on health of Wales's waters](#)

<sup>18</sup> [Water Watch Wales](#)

# Appendix A Inspectors Correspondence

# **Archwiliad Cynllun Datblygu Lleol Newydd Sir Fynwy 2018-2033 Monmouthshire Replacement Local Development Plan 2018-2033 Examination**

Arolygwyr/Inspectors: J de-Courcey BSc LLB MTPI MRTPI  
C MacFarlane BSc (Hons) MSc MRTPI

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Andrew Jones  
Head of Planning  
Monmouthshire County Council

01 December 2025

Dear Mr Jones

## **Replacement Monmouthshire Local Development Plan (LDP) – Initial questions**

Having reviewed the Deposit LDP and submission documents, we consider further information to address the issue of the effect of proposed development on riverine Special Areas of Conservation (SACs) is required before the examination can proceed any further.

It may be that some of the information we seek is contained within the submission documents. If so, this information should be signposted rather than duplicated.

The LDP identifies several allocations as connecting to a wastewater treatment works (WwTW) ultimately discharging to a riverine SAC which is presently failing to meet water quality targets in relation to phosphorus. The Habitat Regulations Assessment (HRA) notes that allocations have been made having regard to WwTW permit limits and phosphates solutions proposed as part of a wider approach to the issue with Natural Resources Wales and Dŵr Cymru Welsh Water. The Infrastructure Delivery Plan Background Paper (updated October 2025) also refers to collaborative working to find solutions to enable growth through the LDP process that do not harm the environmental capacity of watercourses.

Whilst the Infrastructure Delivery Plan Background Paper provides some information on WwTW permit capacity, based on the Deposit consultation response from Dŵr Cymru Welsh Water, this is limited. We also consider the information provided in respect of other measures to be insufficient to meet the requirements of Welsh Government's 'Interim Planning Policy Statement on Development in SAC Rivers' (5 August 2025), particularly the need to demonstrate that appropriate steps to avoid deterioration have been secured.

We also consider that the viability and deliverability implications of securing any potential mitigation has not been made clear.

You are also asked to address:

- The implications of the recent judgement of *CG Fry & Son Ltd v SSHCLG [2025] UKSC 35*, which confirms that the requirement for HRA applies to the discharge of planning conditions, for the delivery of housing commitments i.e. those sites not yet complete and subject to the discharge of conditions;
- Your approach to non-residential allocations, particularly given the findings of Annex B to the HRA that policies in relation to Gypsy and Traveller sites, and employment sites, should be screened in for Appropriate Assessment; and
- Additional points set out in the annex to this letter.

Given the potential importance of this matter to ensuring delivery of the LDP strategy, we request the information contained within the attached annex be provided before the examination can proceed further. In recognition of this, we are suspending the examination for a period of **12 weeks** to enable you to complete the additional work and engage with relevant stakeholders.

The Council should prepare a **work programme** for undertaking all additional work, identifying key tasks, and target dates for completion and submission of new/updated documents. The work programme should be submitted to us via the Programme Officer no later than **15 December 2025**. The Council should provide an update to the Programme Officer every **4 weeks**.

The Council must submit the required information and documents by **23 February 2026**, after which we will inform you of the next steps in the examination process. Upon reflection, if the Council consider this period to be insufficient to enable submission of the further evidence that is required to progress with the examination, please advise the Programme Officer of a likely timescale and keep her apprised of any updates.

If any of the matters we have set out above are unclear, please contact the Programme Officer as soon as possible.

This letter will be published on the examination website. We are not inviting any comments or responses from interested parties.

Yours sincerely,

*J de-Courcey and C MacFarlane*

INSPECTORS

## Annex:

The matters contained within the body of the letter should be addressed, including the information below, with an updated HRA, Infrastructure Delivery Plan, mitigation action plan, explanatory/background paper, and schedule of proposed changes to the LDP.

- Clear information on current and future strategies and actions of the Council/Nutrient Management Board; potential timescales and delivery mechanisms; and possible mitigation solutions and their likely effectiveness in reducing nutrient loads.
- For affected sites (allocations and commitments), confirm:
  - Forecast increases in volumes of phosphorus in each year of the LDP (making reasonable assumptions for units/floorspace, phasing, build out and occupancy).
  - Overall total loads for each catchment.
  - The name of the relevant WwTW, permit limits and how any identified capacity relates to the objective of nutrient neutrality.
  - Updated information on planned/recent improvements for phosphorus stripping (including the percentage efficiency of such stripping) at any relevant WwTW.
  - Where additional phosphorus loadings would arise from the site (i.e. less than 100% stripping), signpost potential suitable on-site or off-site mitigation measures to avoid or reduce adverse effects on the SACs, including the predicted duration of any effects and potential load reductions.
- Ensure that the approach to identifying affected sites is undertaken on a consistent basis, providing a justification for that taken to non-residential development.
- Clarify the potential effect of the *CG Fry* judgement (in relation to the requirement for HRA on the discharge of planning conditions) on the delivery of committed sites and identify any assumptions made in relation to windfall allowances.
- Clarify how dwelling numbers and densities for each allocated site have been arrived at and the implications for on-site mitigation measures.
- Clarify whether the Preliminary Viability Report and Addendum Update include a sufficient allowance for any potential mitigation measures.
- A review of the relevant Deposit LDP policies, and identify any amendments required, in light of the matters raised and information requested.
- Consultation with NRW on the updated HRA and their response.

## Appendix B Allocated Site Data

Table B1 Housing Development Data provided by MCC for the Usk Catchment

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

Table B2 Housing Development Data provided by MCC for the Wye Catchment

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

## Appendix 2 - PEDW Inspectors' letter to Monmouthshire County Council dated 01/12/25

### **Archwiliad Cynllun Datblygu Lleol Newydd Sir Fynwy 2018-2033 Monmouthshire Replacement Local Development Plan 2018-2033 Examination**

Arolygwyr/Inspectors: J de-Courcey BSc LLB MTPI MRTPI  
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01432 639547 / 07879 443035

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Andrew Jones  
Head of Planning  
Monmouthshire County Council

01 December 2025

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The LDP identifies several allocations as connecting to a wastewater treatment works (WwTW) ultimately discharging to a riverine SAC which is presently failing to meet water quality targets in relation to phosphorus. The Habitat Regulations Assessment (HRA) notes that allocations have been made having regard to WwTW permit limits and phosphates solutions proposed as part of a wider approach to the issue with Natural Resources Wales and Dŵr Cymru Welsh Water. The Infrastructure Delivery Plan Background Paper (updated October 2025) also refers to collaborative working to find solutions to enable growth through the LDP process that do not harm the environmental capacity of watercourses.

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We also consider that the viability and deliverability implications of securing any potential mitigation has not been made clear.

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- Your approach to non-residential allocations, particularly given the findings of Annex B to the HRA that policies in relation to Gypsy and Traveller sites, and employment sites, should be screened in for Appropriate Assessment; and
- Additional points set out in the annex to this letter.

Given the potential importance of this matter to ensuring delivery of the LDP strategy, we request the information contained within the attached annex be provided before the examination can proceed further. In recognition of this, we are suspending the examination for a period of **12 weeks** to enable you to complete the additional work and engage with relevant stakeholders.

The Council should prepare a **work programme** for undertaking all additional work, identifying key tasks, and target dates for completion and submission of new/updated documents. The work programme should be submitted to us via the Programme Officer no later than **15 December 2025**. The Council should provide an update to the Programme Officer every **4 weeks**.

The Council must submit the required information and documents by **23 February 2026**, after which we will inform you of the next steps in the examination process. Upon reflection, if the Council consider this period to be insufficient to enable submission of the further evidence that is required to progress with the examination, please advise the Programme Officer of a likely timescale and keep her apprised of any updates.

If any of the matters we have set out above are unclear, please contact the Programme Officer as soon as possible.

This letter will be published on the examination website. We are not inviting any comments or responses from interested parties.

Yours sincerely,

*J de-Courcey and C MacFarlane*

INSPECTORS

**Annex:**

The matters contained within the body of the letter should be addressed, including the information below, with an updated HRA, Infrastructure Delivery Plan, mitigation action plan, explanatory/background paper, and schedule of proposed changes to the LDP.

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  - The name of the relevant WwTW, permit limits and how any identified capacity relates to the objective of nutrient neutrality.
  - Updated information on planned/recent improvements for phosphorus stripping (including the percentage efficiency of such stripping) at any relevant WwTW.
  - Where additional phosphorus loadings would arise from the site (i.e. less than 100% stripping), signpost potential suitable on-site or off-site mitigation measures to avoid or reduce adverse effects on the SACs, including the predicted duration of any effects and potential load reductions.
- Ensure that the approach to identifying affected sites is undertaken on a consistent basis, providing a justification for that taken to non-residential development.
- Clarify the potential effect of the *CG Fry* judgement (in relation to the requirement for HRA on the discharge of planning conditions) on the delivery of committed sites and identify any assumptions made in relation to windfall allowances.
- Clarify how dwelling numbers and densities for each allocated site have been arrived at and the implications for on-site mitigation measures.
- Clarify whether the Preliminary Viability Report and Addendum Update include a sufficient allowance for any potential mitigation measures.
- A review of the relevant Deposit LDP policies, and identify any amendments required, in light of the matters raised and information requested.
- Consultation with NRW on the updated HRA and their response.

### Appendix 3: RLDP Residential / Mixed Use Allocations and Commitments

#### RLDP Residential Commitments

The table below provides a list of the residential sites that have contributed to completions during the Plan period to date (2018 – 2025) or have an extant planning permission and, therefore, contribute to the existing commitments component of the RLDP's housing supply. Only those sites shaded green are located within the affected riverine SACs and have, therefore, been factored into the P load calculations.

| Settlement Tier      | Planning Application Ref: | Site Name                         | Total Capacity | Completions | Units Remaining | Phosphorus Sensitive Catchment | Screened In / Out of P Load Calculations | No. of Units Screened in | Notes                                                 |
|----------------------|---------------------------|-----------------------------------|----------------|-------------|-----------------|--------------------------------|------------------------------------------|--------------------------|-------------------------------------------------------|
| Abergavenny (Tier 1) | DC/2014/01360             | Deri Farm                         | 250            | 250         | 0               | Usk                            | Out                                      | 0                        | Site complete                                         |
| Abergavenny (Tier 1) |                           | Coed Glas                         | 51             | 51          | 0               | Usk                            | Out                                      | 0                        | Site complete                                         |
| Abergavenny (Tier 1) | DC/2014/01015             | Mulberry House                    | 27             | 7           | 20              | Usk                            | Out                                      | 0                        | Units not included in housing figures as part of NDA. |
| Abergavenny (Tier 1) |                           | The Hill                          | 44             | 44          | 0               | Usk                            | Out                                      | 0                        | Site complete                                         |
| Abergavenny (Tier 1) |                           | Magistrates Court                 | 47             | 47          | 0               | Usk                            | Out                                      | 0                        | Site complete                                         |
| Abergavenny (Tier 1) |                           | Brecon Road                       | 24             | 24          | 0               | Usk                            | Out                                      | 0                        | Site complete                                         |
| Llanfoist (Tier 1)   | DM/2019/00346             | Grove Farm                        | 106            | 89          | 17              | Usk                            | Out                                      | 0                        | Site under construction                               |
| Chepstow (Tier 1)    | DM/2019/00001             | Fairfield Mabey                   | 373            | 373         | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |
| Chepstow (Tier 1)    | DM/2024/00422             | Fairfield Mabey (Commercial Land) | 46             | 0           | 46              | Outside Riverine SAC Catchment | Out                                      | 0                        |                                                       |

| Settlement Tier     | Planning Application Ref: | Site Name                       | Total Capacity | Completions | Units Remaining | Phosphorus Sensitive Catchment | Screened In / Out of P Load Calculations | No. of Units Screened in | Notes                                                 |
|---------------------|---------------------------|---------------------------------|----------------|-------------|-----------------|--------------------------------|------------------------------------------|--------------------------|-------------------------------------------------------|
| Chepstow (Tier 1)   | DC/2009/0910              | Osborn International            | 161            | 69          | 92              | Outside Riverine SAC Catchment | Out                                      | 0                        | Units not included in housing figures as part of NDA. |
| Chepstow (Tier 1)   | DM/2022/00848             | Boverton House Day Centre       | 15             | 0           | 15              | Outside Riverine SAC Catchment | Out                                      | 0                        |                                                       |
| Monmouth (Tier 1)   | DM/2019/02054             | Hillcrest Road, Wyesham         | 11             | 11          | 0               | Wye                            | Out                                      | 0                        | Site complete                                         |
| Monmouth (Tier 1)   |                           | Wonastow Road (TW)              | 166            | 166         | 0               | Wye                            | Out                                      | 0                        | Site complete                                         |
| Monmouth (Tier 1)   |                           | Wonastow Road (Barratt/DW)      | 174            | 174         | 0               | Wye                            | Out                                      | 0                        | Site complete                                         |
| Monmouth (Tier 1)   | DC/2017/0539              | West of Rockfield Road          | 70             | 0           | 70              | Wye                            | In                                       | 70                       | Screened in                                           |
| Severnside (Tier 1) |                           | Brookside, Caldicot             | 25             | 25          | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |
| Severnside (Tier 1) |                           | Former White Hart Inn, Caldicot | 16             | 16          | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |
| Severnside (Tier 1) | DM/2023/01030             | Land North of Caldicot School   | 46             | 0           | 46              | Outside Riverine SAC Catchment | Out                                      | 0                        |                                                       |
| Severnside (Tier 1) |                           | Church Road, Caldicot           | 130            | 130         | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |
| Severnside (Tier 1) |                           | Ifton Manor, Rogiet             | 14             | 14          | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |
| Severnside (Tier 1) |                           | Old Shipyard, Sudbrook          | 46             | 46          | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete                                         |

| Settlement Tier      | Planning Application Ref: | Site Name                        | Total Capacity | Completions | Units Remaining | Phosphorus Sensitive Catchment | Screened In / Out of P Load Calculations | No. of Units Screened in | Notes                   |
|----------------------|---------------------------|----------------------------------|----------------|-------------|-----------------|--------------------------------|------------------------------------------|--------------------------|-------------------------|
| Severnside (Tier 1)  |                           | Sudbrook Paper Mill              | 210            | 210         | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete           |
| Severnside (Tier 1)  | DM/2018/01606             | Rockfield Farm (Phase 1), Undy   | 144            | 144         | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete           |
| Severnside (Tier 1)  | DM/2021/00357             | Rockfield Farm (Remainder), Undy | 120            | 0           | 120             | Outside Riverine SAC Catchment | Out                                      | 0                        |                         |
| Severnside (Tier 1)  | DM/2019/01041             | Crick Road, Portskewett          | 269            | 87          | 182             | Outside Riverine SAC Catchment | Out                                      | 0                        |                         |
| Severnside (Tier 1)  | DM/2022/01042             | Land at Vinegar Hill, Undy       | 142            | 89          | 53              | Outside Riverine SAC Catchment | Out                                      | 0                        |                         |
| Penperlleni (Tier 2) |                           | South of Usk Road                | 25             | 25          | 0               | Usk                            | Out                                      | 0                        | Site complete           |
| Penperlleni (Tier 2) |                           | South of Usk Road                | 40             | 40          | 0               | Usk                            | Out                                      | 0                        | Site complete           |
| Raglan (Tier 2)      | DM/2021/02070             | Land at Chepstow Rd, Raglan      | 38             | 0           | 38              | Usk                            | Out                                      | 0                        | Site under construction |
| Usk (Tier 2)         |                           | Cwrt Burrium, Usk                | 7              | 7           | 0               | Usk                            | Out                                      | 0                        | Site complete           |
| Shirenewton (Tier 3) |                           | (North of Minor Rd) Shirenewton  | 5              | 5           | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete           |
| Shirenewton (Tier 3) | DM/2018/02066             | (South of Minor Rd) Shirenewton  | 11             | 0           | 11              | Outside Riverine SAC Catchment | Out                                      | 0                        |                         |
| Cross Ash (Tier 4)   | DC/2017/01335             | Land adj Cross Ash Garage        | 6              | 3           | 3               | Usk                            | Out                                      | 0                        | Site under construction |

| Settlement Tier    | Planning Application Ref: | Site Name                      | Total Capacity | Completions | Units Remaining | Phosphorus Sensitive Catchment | Screened In / Out of P Load Calculations | No. of Units Screened in | Notes         |
|--------------------|---------------------------|--------------------------------|----------------|-------------|-----------------|--------------------------------|------------------------------------------|--------------------------|---------------|
| Devauden (Tier 3)  | DM/2018/01741             | Land at Well Lane, Devauden    | 15             | 15          | 0               | Usk                            | Out                                      | 0                        | Site complete |
| Dingestow (Tier 3) |                           | Land south-east Dingestow      | 15             | 15          | 0               | Wye                            | Out                                      | 0                        | Site complete |
| Llanishen (Tier 4) | DM/2019/02053             | R/O Carpenters Arms, Llanishen | 8              | 8           | 0               | Outside Riverine SAC Catchment | Out                                      | 0                        | Site complete |

## RLDP Residential and Mixed-use Allocations

The table below sets out the proposed RLDP residential and mixed-use allocations. Sites shaded green are located within the affected riverine SACs and have, therefore, been factored into the P load calculations.

| Settlement Tier      | Policy Ref: | Site Name                       | Total Capacity in Plan Period | Planning Application Details where applicable                                                                                        | Phosphorus Sensitive SAC Catchment | Screened In / Out of the P Load Calculations | No. of Units Screened in |
|----------------------|-------------|---------------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------|--------------------------|
| Abergavenny (Tier 1) | HA1         | Land to the East of Abergavenny | 500                           |                                                                                                                                      | Usk                                | In                                           | 500                      |
| Abergavenny (Tier 1) | HA5         | Land at Penlanlas Farm          | 100                           |                                                                                                                                      | Usk                                | In                                           | 100                      |
| Chepstow (Tier 1)    | HA3         | Land at Mounton Road            | 146                           |                                                                                                                                      | Outside Riverine SAC Catchment     | Out                                          | 0                        |
| Monmouth (Tier 1)    | HA6         | Land at Rockfield Road          | 60                            |                                                                                                                                      | Wye                                | In                                           | 60                       |
| Monmouth (Tier 1)    | HA4         | Land at Leasbrook               | 270                           |                                                                                                                                      | Wye                                | In                                           | 270                      |
| Monmouth (Tier 1)    | HA7         | Land at Drewen Farm             | 110                           | DM/2024/01295 resolution to approve at 9 <sup>th</sup> September 2025 Planning Committee subject to the signing of a S106 Agreement. | Wye                                | In                                           | 110                      |

| Settlement Tier      | Policy Ref: | Site Name                                           | Total Capacity in Plan Period | Planning Application Details where applicable             | Phosphorus Sensitive SAC Catchment | Screened In / Out of the P Load Calculations | No. of Units Screened in |
|----------------------|-------------|-----------------------------------------------------|-------------------------------|-----------------------------------------------------------|------------------------------------|----------------------------------------------|--------------------------|
| Monmouth (Tier 1)    | HA8         | Tudor Road, Wyesham                                 | 50                            | DM/2024/00557- 50 affordable dwellings approved 26/03/25. | Wye                                | In                                           | 50                       |
| Severnside (Tier 1)  | HA2         | Land to the East of Caldicot / North of Portskewett | 770                           |                                                           | Outside Riverine SAC Catchment     | Out                                          | 0                        |
| Severnside (Tier 1)  | HA9         | Land at Former MOD, Caerwent                        | 40                            |                                                           | Outside Riverine SAC Catchment     | Out                                          | 0                        |
| Raglan (Tier 2)      | HA10        | South of Monmouth Road                              | 54                            |                                                           | Usk                                | In                                           | 54                       |
| Usk (Tier 2)         | HA11        | Land East of Burrium Gate                           | 40                            |                                                           | Usk                                | In                                           | 40                       |
| Penperlleni (Tier 2) | HA12        | Land West of Trem yr Ysgol                          | 42                            |                                                           | Usk                                | In                                           | 42                       |
| St Arvans (Tier 3)   | HA13        | Land adj, Piercefield Pub                           | 16                            |                                                           | Outside Riverine SAC Catchment     | Out                                          | 0                        |
| Devauden (Tier 3)    | HA14        | Land at Churchfields                                | 20                            |                                                           | Usk                                | In                                           | 20                       |
| Little Mill (Tier 3) | HA15        | Land East Little Mill                               | 20                            |                                                           | Usk                                | In                                           | 20                       |
| Little Mill (Tier 3) | HA16        | Land North of Little Mill                           | 15                            | DM/2020/01438- 15 units approved 17/09/2024.              | Usk                                | In                                           | 15                       |

| Settlement Tier      | Policy Ref: | Site Name                          | Total Capacity in Plan Period | Planning Application Details where applicable | Phosphorus Sensitive SAC Catchment | Screened In / Out of the P Load Calculations | No. of Units Screened in |
|----------------------|-------------|------------------------------------|-------------------------------|-----------------------------------------------|------------------------------------|----------------------------------------------|--------------------------|
| Llanellen (Tier 3)   | HA17        | Land adjacent Llanellen Court Farm | 26                            |                                               | Usk                                | In                                           | 26                       |
| Shirenewton (Tier 3) | HA18        | Land west of Redd Landes           | 26                            |                                               | Outside Riverine SAC Catchment     | Out                                          | 0                        |

## Appendix 4: RLDP Residential Allocations – Average Densities

| Site Name                                                  | Site Area (ha) | No. of Homes  | Gross Housing Density (homes per ha) | GI / SuDS Area on Site (approx. ha) | Non-residential uses on Site (approx. ha) | Net Developable Area for Homes (approx. ha) | Net Housing Density (homes per ha) |
|------------------------------------------------------------|----------------|---------------|--------------------------------------|-------------------------------------|-------------------------------------------|---------------------------------------------|------------------------------------|
| HA1 Land to the East of Abergavenny                        | 35.9           | 500           | 13.93                                | 16.2                                | 3                                         | 16.7                                        | 29.94                              |
| HA2 Land to the East of Caldicot / North of Portskewett    | 64             | 770           | 12.03                                | 32                                  | 4.5                                       | 27.5                                        | 28.00                              |
| HA3 Land at Moun-ton Road, Chepstow                        | 12.8           | 146           | 11.41                                | 5.9                                 | 1.5                                       | 5.4                                         | 27.04                              |
| HA4 Land at Leasbrook, Monmouth                            | 11             | 270           | 24.55                                | 3.2                                 | 0                                         | 7.8                                         | 34.62                              |
| HA5 Land at Penlanlas Farm, Abergavenny                    | 6.17           | 100           | 16.21                                | 2.4                                 | 0                                         | 3.77                                        | 26.53                              |
| HA6 Land at Rockfield Road, Monmouth (allocated part only) | 1.5            | 60            | 40.00                                | 0.1                                 | 0                                         | 1.4                                         | 42.86                              |
| HA7 Land at Drewen Farm, Monmouth (DM/2024/01295)          | 6.6            | 110           | 16.67                                | 2.1                                 | 0                                         | 4.5                                         | 24.44                              |
| HA8 Land at Tudor Road, Monmouth (DM/2024/00557)           | 2.1            | 50            | 23.81                                | 1.05                                | 0                                         | 1.05                                        | 47.62                              |
| HA9 Land at Former MOD, Caerwent                           | 4.2            | 40            | 9.52                                 | 1.1                                 | 1.5                                       | 1.6                                         | 25.00                              |
| HA10 Land South of Monmouth Road, Raglan                   | 4.5            | 54            | 12.00                                | 2.8                                 | 0                                         | 1.7                                         | 31.76                              |
| HA11 Land East of Burrium Gate, Usk                        | 2.6            | 40            | 15.38                                | 1.03                                | 0                                         | 1.57                                        | 25.48                              |
| HA12 Land West of Trem-yr-Ysgol, Penperlleni               | 3.4            | 42            | 12.35                                | 1.59                                | 0                                         | 1.81                                        | 23.20                              |
| HA13 Land Adjacent to Piercefield Public House, St Arvans  | 1.1            | 16            | 14.55                                | 0.52                                | 0                                         | 0.58                                        | 27.59                              |
| HA14 Land at Churchfields, Devauden                        | 1              | 20            | 20.00                                | 0.4                                 | 0                                         | 0.6                                         | 33.33                              |
| HA15 Land East of Little Mill                              | 1.68           | 20            | 11.90                                | 0.87                                | 0                                         | 0.81                                        | 24.69                              |
| HA16 Land North of Little Mill (DM/2020/01438)             | 0.87           | 15            | 17.24                                | 0.34                                | 0                                         | 0.53                                        | 28.30                              |
| HA17 Land Adjacent to Llanellen Court Farm, Llanellen      | 1.56           | 26            | 16.67                                | 0.4                                 | 0                                         | 1.16                                        | 22.41                              |
| HA18 Land West of Redd Landes, Shirenewton                 | 1.76           | 26            | 14.77                                | 0.46                                | 0                                         | 1.3                                         | 20.00                              |
| <b>Average</b>                                             | <b>9.04</b>    | <b>128.06</b> | <b>16.83</b>                         | <b>4.03</b>                         | <b>2.63</b>                               | <b>4.43</b>                                 | <b>29.05</b>                       |

