



Monmouthshire Replacement Local Development Plan 2018-2033

Statement of Common Ground between
Monmouthshire County Council (Local Planning
Authority) and Bannau Brycheiniog National Park
Authority (Local Planning Authority)



monmouthshire
sir fynwy



Bannau
Brycheiniog

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STATEMENT OF COMMON GROUND

1. Purpose of this Statement of Common Ground

- 1.1. This Statement of Common Ground is a joint statement between Monmouthshire County Council (MCC) and Bannau Brycheiniog National Park Authority (BBNPA) regarding the Monmouthshire Replacement Local Development Plan (RLDP). MCC and the BBNPA are separate authorities, that overlap geographically, with a portion of Monmouthshire lying within BBNP (see Appendix 1). MCC is responsible for most local government functions across the County, however, BBNPA is the planning authority and plan-maker for all the land within the National Park. MCC has local authority appointed members that contribute to the oversight of the BBNPA as part of the governance arrangements. Reflecting this relationship and as a neighbouring local planning authority to MCC, BBNPA is a ‘specific consultation body¹’ in the plan process. The Statement of Common Ground (SoCG) provides an overview of joint working and collaboration between our local planning authorities during the plan preparation process and provides a useful position statement for the Inspectors, to enable discussions at the Examination to focus primarily on any remaining areas of disagreement.

2. BBNP Replacement Local Development Plan (RLDP)

- 2.1. Bannau Brycheiniog National Park (BBNP) is located to the north-western area of Monmouthshire with some of Monmouthshire’s settlements, namely Govilon and Gilwern, falling within the BBNP planning area. The BBNP’s boundary lies to the north and west of the primary settlement of Abergavenny and Llanfoist. The extent of the area of Monmouthshire designated as a National Park is shown in Appendix 1. The Bannau Brycheiniog National Park Local Development Plan 2007-2022 was reviewed in 2018, with the outcome being that a full replacement plan is required. Consultation on a Delivery Agreement for preparing a replacement plan was undertaken between 1st May and 26th June 2025, however progress has since stalled because the Authority has been unable to recruit a Planning Policy and Strategy Manager and the Delivery Agreement is yet to be agreed by either the National Park Authority or Welsh Government.

3. Joint Working and Collaboration

- 3.1. The Development Plans Manual notes that in order to satisfy Test 1 (Does the Plan Fit?) of the Tests of Soundness, LPAs should consider and demonstrate they have exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base and ensure that the plan is compatible with the plans of neighbouring LPAs.
- 3.2. On-going regional meetings and collaboration are pursued through the longstanding South-East Wales Strategic Planning Group (SEWSPG), the Planning Officers Society Wales (POSW) and the South-East Wales Planning Officer Society (SEWPOS), which both BBNPA and MCC attend. Work undertaken by SEWSPG and topic-based Pathfinder groups, have helped establish a common approach to a number of Plan preparation tasks including candidate sites assessments, sustainable settlement appraisals and retail and employment land monitoring. The preparation of the Deposit Plan has also involved a regional and coordinated

¹ As defined in LDP Regulation 2.

approach to the collection of evidence. Examples include the Stage 1 Strategic Flood Consequence Assessment (SD97) and use of the same Development Viability Model.

- 3.3. In addition to planning specific working groups, MCC and BBNPA are also members of the Usk Catchment Partnership, which brings together statutory bodies and interested parties around a shared aim to restore the ecological health and resilience of the River Usk and its catchment. A key output of the partnership is the River Usk Nutrient Management Plan (NMP), which aims to achieve nutrient neutrality, improve SAC features conditions, and enable sustainable development while enhancing resilience to climate change and flooding.
- 3.4. Representatives of MCC and BBNP have also collaborated during key RLDP stages to discuss plan preparation, including proposed growth levels and spatial options in the respective areas. No concerns were raised by either party.
- 3.5. Additional specific collaboration was undertaken between MCC and BBNPA in relation to the site identification process relating to a Gypsy and Traveller site. Representatives of MCC and BBNP met in April 2022 to discuss the inclusion of MCC owned land within the BBNP boundary as part of the site sifting exercise. BBNP confirmed that it did not have any suitable BBNP owned land within the area as it is largely in the hills and mountains but would be prepared to consider MCC owned land within the BBNP boundary. However, the risk of such an approach was noted due to the potential delay in the BBNP RLDP, which at the time related to the introduction of tighter water quality targets, and the implications of plan timescales no longer aligning. Following the outcome of the meeting, MCC owned land within the BBNP boundary was sifted out of the site selection process.

4. Deposit RLDP Representations

- 4.1. A summary of the representations submitted by BBNPA (Representor ref: 1061) to the Deposit RLDP and MCC's response is set out in Appendix 2, with full details of the representations available to view in Volume 24 of the Representations Register (SD83). BBNPA expressed support for a number of policy areas of the Deposit Plan, including the inclusion of policy LC3 – Bannau Brycheiniog National Park, and the policy objective to enhance and sustain Abergavenny town centre. BBNPA suggested a number of policy wording amendments, some of which have been agreed to as a minor amendment by MCC as set out in Appendix 2 and incorporated into the Deposit RLDP as amended (SD9) and Deposit RLDP Schedule of Minor Changes (SD16).
- 4.2. BBNPA notes MCC's response and withdraws objections in relation to understanding the potential impact of the RLDP growth strategy on BBNP and carbon emissions. MCC's position remains that the modelling underpinning the growth levels set out in the RLDP is based on a demographic-led option for the Local Planning Authority Area, excluding the BBNPA area within Monmouthshire, applying assumptions in relation to migration, household membership rates and commuting ratio. Whilst the preferred growth and spatial options do not specifically indicate the impact on the general National Park area, the resultant growth strategy is considered to be a sustainable level that addresses MCC's local evidence-based issues and objectives, including in relation to the delivery of affordable homes, sustainable economic growth, and rebalancing out demography and responding to the climate and nature emergency.
- 4.3. The RLDP directs growth to the County's Primary Settlements, including two sites in Abergavenny (HA1 – Land to the East of Abergavenny and HA5 – Land at Penlanlas Farm). This is in accordance with the findings of the Sustainable Settlements Appraisal (SD160 & SD161), which confirms the dominant role of the primary settlements of Abergavenny,

Chepstow, Caldicot and Monmouth. The limited level of employment allocations made in Abergavenny is recognised; however, this reflects the limited number of candidate site submissions the Council received for the area for employment use. The Council will, however, continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the Cardiff Capital Region (CCR) and other relevant partners. Furthermore, Policy EA2 of the Replacement Local Development Plan (RLDP) protects six existing industrial estates for employment use within Abergavenny, which also contribute to provision in the area. The plan's policy framework also supports/enables proposals for sustainable economic growth in Abergavenny, including proposals in foundational sectors, such as tourism, food and retail, which play an important role in the local economy.

- 4.4. The relationship and proximity between Abergavenny and the BBNP boundary are also recognised by the RLDP. The Plan proposes a Green Wedge designation to the north-west of Abergavenny, which in accordance with PPW will provide a buffer between the settlement edge and the BBNP and safeguard important views into and out of the area.
- 4.5. The RLDP growth strategy has not been modelled in terms of its impact on carbon emissions, however, providing a policy framework that responds to the climate and nature emergency is a key objective of the Plan. In order to reduce carbon emissions the Plan includes a policy requirement for new homes to be constructed to net zero carbon standards and includes a suite of policies to ensure climate change considerations are a priority in assessing new development including the incorporation of green infrastructure, active travel routes, opportunities for nature recovery and a policy framework for promoting renewable energy generation.
- 4.6. MCC's position remains that the Plan provides the policy framework to address all elements of sustainable development including the provision of homes and economic growth as advocated by PPW and addresses Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity.
- 4.7. Similarly, BBNPA notes and withdraws its objections to MCC's position in relation to development in the countryside which had been noted as 'open' when compared with PPW, e.g. Policy H4 - Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use and Policy T1- New or Extended Tourism Accommodation and Facilities in the Open Countryside. MCC's position remains that the RLDP's approach to development in the countryside is consistent with PPW's stance that development in the countryside must continue to be strictly controlled, but is permissible in certain circumstances, with policies H4 and T1 providing additional local criteria-based policy requirements to those set out in PPW, to ensure such proposals are undertaken sensitively within a Monmouthshire context.
- 4.8. At the time of writing, the outstanding area of concern relates to the Appropriate Assessment of the Plan's impact on the integrity of the River Usk Special Area of Conservation. It is hoped that this can be resolved through continued discussion before examination hearings, with the involvement of Natural Resources Wales and potentially through the ongoing work of the Usk Catchment Partnership, which both Local Authorities contribute to.

5. Conclusion

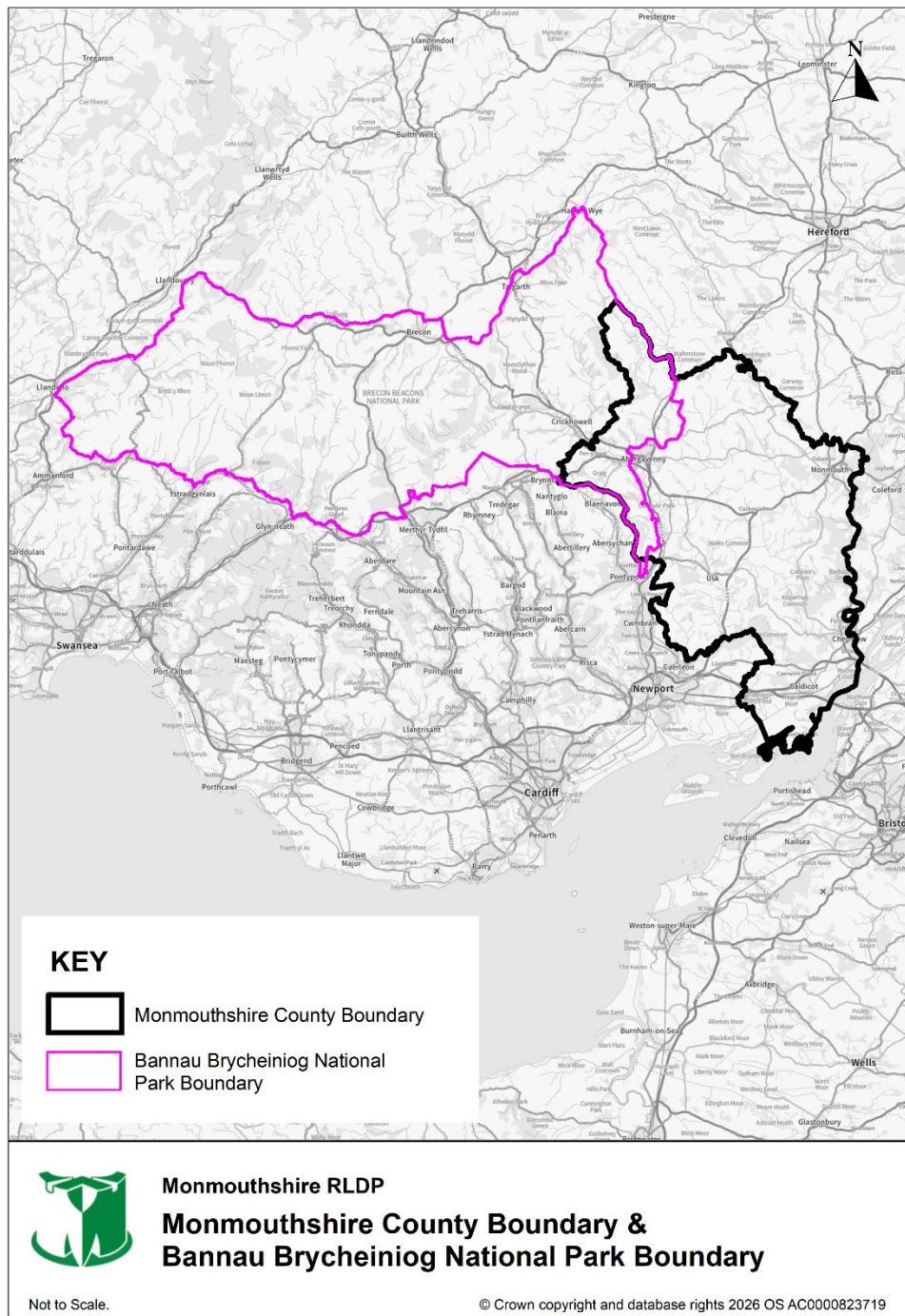
- 5.1. This SoCG is a fair representation of the common ground between the Authorities at the current time.

6. Signatories to the Statement of Common Ground

Signed on behalf of The Local Planning Authority:	
Name:	Andrew Jones
Position:	Head of Planning
Date:	02/04/2026

Signed on behalf of BBNPA:	
Name:	Gareth Jones
Position:	Director, Planning and Place
Date:	17.03.2026

Appendix 1: Authority Boundaries



Appendix 2: Representations Submitted by BBNPA to the Monmouthshire Deposit RLDP

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
Objection	S1 – Growth Strategy	Question whether modelling has indicated the impact of drawing 13,950 people to live in the County, in combination with that proposed by Powys CC (14,924 people net) and the CCR objectives to draw population, on the National Park will be.	The modelling underpinning the growth levels set out in Policy S1 is based on a demographic-led option for the Local Planning Authority Area, excluding the Bannau Brycheiniog National Park area within Monmouthshire, applying assumptions in relation to migration, household membership rates and commuting ratio. Whilst the modelling does not specifically indicate the impact on the general National Park area, the resultant growth level is considered to be a sustainable level that addresses our local evidence-based issues and objectives, including in relation to the delivery of affordable homes, sustainable economic growth, and rebalancing out demography and responding to the climate and nature emergency. In response to the Deposit RLDP consultation, Welsh Government formally responded with a 'green' rating noting that the Plan is considered to be in general conformity with Future Wales, noting that the level of growth proposed is justified by the need to significantly increase the supply of affordable housing whilst not diverting growth away from the national growth area or having adverse effects on phosphate pollution.	No change required.	Response noted. Withdrawn.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
Objection	S2 – Spatial Distribution of Development	Question whether there is an appropriate employment/dwelling balance in Abergavenny and what the impact might be on the National Park of this - Abergavenny residential growth distribution 22% of Plan total of 1,362 homes - employment growth 3% of Plan total of 1.7ha.	The limited level of employment allocations made in Abergavenny is recognised; however, this reflects the limited number of candidate site submissions the Council received for the area for employment use. The Council will, however, continue to explore opportunities to bring forward vacant premises in Abergavenny for employment use, in conjunction with the Cardiff Capital Region (CCR) and other relevant partners. Furthermore, Policy EA2 of the Replacement Local Development Plan (RLDP) protects six existing industrial estates for employment use within Abergavenny, which also contribute to provision in the area. The plan's policy framework also supports/enables proposals for sustainable economic growth in Abergavenny, including proposals in foundational sectors, such as tourism, food and retail, which play an important role in the local economy. On a strategic level, there is broad alignment between the proposed level of housing and employment land set out in the RLDP, with the majority of both directed to the primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area).	No change required.	Response noted. Withdrawn.
Objection	S4 – Climate Change	Question what the modelled impact that the Plan will have on the County meeting its decarbonisation trajectory, which isn't set out or referenced i.e. of the additional 6,210	The RLDP's proposals haven't been modelled in terms of their impact on carbon emissions. However, the Plan establishes a policy requirement for new homes to be constructed to net zero carbon standards and includes a	No change required.	Response noted. Withdrawn.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
		homes and associated employment development proposed in an attempt to draw 13,950 people net to live in the County by the end of the Plan period.	suite of policies to ensure climate change considerations are a priority in assessing new development including the incorporation of green infrastructure, active travel routes, opportunities for nature recovery and a policy framework for promoting renewable energy generation. Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect, the RLDP has a duty to address all elements of sustainable development including the provision of homes and economic growth and address Monmouthshire's core issues including responding to the climate and nature emergency, as well as housing affordability, rebalancing our demography and economic prosperity, which is reflected in the policy framework.		
Support	LC3 – Bannau Brycheiniog National Park	Welcome consideration of the National Park designation and approach to your Council's s62(2) duty which is apparent through decision making frameworks for directing strategic growth, through Policy specifically relating to the National Park e.g. Policy LC3 (Bannau Brycheiniog National Park) and the designation of green wedges in Abergavenny (Policy GW1 - Green Wedge Designations).	Support welcomed.	No change required.	Response noted. Support maintained.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
Comment	LC3 – Bannau Brycheiniog National Park	We note your Council's significant role in delivering Dyfodol Y Bannau (and consider the missions should be referenced both in the LDP and the Environmental Report (SEA) [although we recognise that Dyfodol Y Bannau and 'Place Planning' is] and we hope to work with you on its delivery.	Comments noted. It is considered appropriate to include reference to the 'Dyfodol Y Bannau' in paragraph 10.7.2 and within the links to wider policy framework (page 89). The BBNP Management Plan is referenced in the ISA in para 8.12.24 – this reference will also be updated accordingly.	Amend the wording of paragraph 10.7.2 to include the following text: 'Although there are 12,000 hectares of National Park with the County its planning is controlled by the Bannau Brycheiniog National Park Authority. The current Management Plan 'Dyfodol Y Bannau' for the BBNP 2023-2028 sets out future aspirations, protections and vision for the BBNP. Dyfodol Y Bannau sets out numerous themes, policies and priorities for managing change in the National Park. It is recognised that the BBNP provides an important backdrop to the	Response noted. Supported.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
				Abergavenny area and wider landscape character of Monmouthshire protecting its setting from encroachment by inappropriate development.'	
Objection	LC3 – Bannau Brycheiniog National Park	Consider Policy LC3 could be tightened up. New wording suggested as follows: Development in the vicinity of the Bannau Brycheiniog National Park will only be permitted where it would: a) Conserve or enhance the landscape setting; b) have no serious adverse effect on significant views into and out of the National Park; c) have no adverse impact on the International Dark Skies Reserve Designation. Development that would cause unacceptable harm to the Bannau Brycheiniog National Park or its setting will not be permitted.	Comments noted and accepted. It is considered appropriate to amend the policy wording as suggested.	Amend criterion a) to 'Conserve or enhance the landscape setting, as defined through the LANDMAP process.' Amend the final sentence of the policy to 'Development that would cause unacceptable harm to the Bannau Brycheiniog National Park or its setting will not be permitted.'	Response noted. Withdrawn.
Objection	NR1 – Nature Recovery and Geodiversity	Recognising they require modelling with partners, as they have implications for the National Park, we would like to understand the proposed strategic approach to identifying resilient ecological	Monmouthshire County Council look forward to working with the BBNP and NRW as part of the South-East Wales Area Statement to identify resilient ecological networks in preparation for the SDP.	No change required.	Response noted. Withdrawn.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
		networks in advance of SDP preparation (none appear to be identified in the Deposit Plan).			
Objection	H4 – Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use	Wish to understand approach to development in the countryside, which appears open when compared with PPW, e.g. Policy H4 - Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use and Policy T1 - New or Extended Tourism Accommodation and Facilities in the Open Countryside.	Planning Policy Wales states that new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. Policy S2 – Spatial Distribution of Development, is considered to accord with this, clearly stating that outside of Tiers 1 – 4 of the settlement hierarchy, open countryside policies will apply, though there are exceptions where certain types of development will be allowed subject to national planning policy and detailed planning criteria. Policy H4 relates to the conversion or rehabilitation of existing buildings and the inclusion of a criteria-based policy to ensure such proposals are undertaken sensitively, within the context of Monmouthshire's countryside is considered necessary to provide strict controls to such development. Detailed comments relating to Policy T1 – New or Extended Tourism Accommodation Facilities in the Open Countryside, are addressed in relation to that policy elsewhere in the report.	No change required.	Response noted. Withdrawn.
Objection	T1 – New or Extended Tourism Accommodation and Facilities in	The policy does not appear to require consideration of accessibility for all in the context of the Equalities Act 2010 - especially when designing new development.	Comments noted. The RLDP should be read as a whole, and it is considered that Strategic Policy S3 Sustainable Placemaking & High Quality Design i) covers accessibility for all, which will be	No change required.	Response noted. Withdrawn.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
	the Open Countryside		a relevant policy consideration when considering new tourism proposals.		
Objection	T1 – New or Extended Tourism Accommodation and Facilities in the Open Countryside	Wish to understand approach to development in the countryside, which appears open when compared with PPW, e.g. Policy H4 - Conversion / Rehabilitation of Buildings in the Open Countryside for Residential Use and Policy T1 - New or Extended Tourism Accommodation and Facilities in the Open Countryside	The approach to Policy T1 is to set out a supportive Policy Framework for Sustainable Tourism, as reflected in Strategic Policy S12 – Visitor Economy, which is consistent with national policy (PPW and Future Wales). This advocates an approach for LDPs to plan positively and recognise the importance of tourism to economic prosperity and job creation in both urban and rural areas, balancing this against the need to protect Monmouthshire's unique and special countryside. Policy T1, therefore, sets out detailed criteria on how proposed tourist facilities and accommodation could be acceptable in Monmouthshire in open countryside locations. The policy is providing the framework to consider such developments consistent with national guidance. As set out in the supporting text to Policy T1, it is anticipated that further SPG on Sustainable Tourism will be produced, to provide further guidance for tourism proposals within Monmouthshire's open countryside locations. Detailed comments on Policy H4 – 'Conversion/Rehabilitation of Buildings in the Open Countryside' are set out in this section of the report.	No change required.	Response noted. Withdrawn.
Support	S14 – Town, Local and Neighbourhood Centres	Welcome approach to sustain and enhance the centre of Abergavenny, which is a key gateway to the National Park.	Support welcomed.	No change required.	Response noted. Support maintained.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
Objection	Appendix 4 – Legislative and Policy Context	National Parks and Access to the Countryside Act 1949 should be referenced.	The list of legislation noted in Appendix 4 is not intended to be an exhaustive list, but key pieces of legislation within the context of development plan preparation. It is not, therefore, considered necessary to include the National Parks and Access to the Countryside Act 1949.	No change required.	Response noted. Withdrawn.
Objection	Appendix 5 – Regional Collaboration and Linkages with Neighbouring Local Authorities	Amend to 11 LPAs in South East Wales Planning Group (i.e. including the BBNP) rather than 10.	Comment noted. It is considered appropriate to amend the number of LPAs, as referred to within SEWSPG, from 10 to 11, as so to include the BBNP planning authority.	Change to read 11 LPAs as recommended.	Response noted. Withdrawn.
Comment	ISA	We note your Council's significant role in delivering Dyfodol Y Bannau (and consider the missions should be referenced both in the LDP and the Environmental Report (SEA) [although we recognise that Dyfodol Y Bannau and 'Place Planning' is] and we hope to work with you on its delivery.	The relationship with the Bannau Brycheiniog National Park and Dyfodol Y Bannau (management plan) is recognised in the ISA. It is noted that this reference however relates to the previous management plan and therefore paragraph 8.12.24 will be updated to refer to the Dyfodol Y Bannau: The Future (The Management Plan for Bannau Brycheiniog National Park 2023-2028) instead. Reference to the specific missions set out in the Dyfodol Y Bannau is however not considered necessary.	Update reference in paragraph 8.12.24 of the ISA to delete BBNP Management Plan and replace with 'Dyfodol Y Bannau: The Future (The Management Plan for Bannau Brycheiniog National Park 2023-2028)'	Response noted. Withdrawn.
Objection	HRA	Welcome ongoing discussions of the approach towards ensuring water quality in the Usk (in particular) and continue to need to work very closely	Aecom consultants, who undertook the Habitats Regulations Assessment (HRA) on the Deposit Plan, has advised that whereas the Sustainability Appraisal can (and should) discuss things like	No change required.	Response noted. Objection maintained.

Support or Objection	Deposit Plan Ref / Policy	Representation Summary	Council Response	LPA Recommendation	BBNP's Response
		on cross boundary settlements - perhaps through the Usk Catchment Partnership. One issue in the HRA of Usk/Wye is that it doesn't appear to consider impact of climate change on water temperature and the in-combination impacts arising on features.	climate change impacts in broad terms, including effects on habitats and designated sites, the HRA has to be much more specific, to link particular developments to impacts on specific European sites. The effects of climate change will exacerbate existing issues, and reference could be made to that in the HRA for background. However, these are national/global issues rather than being a specific direct effect of development x on European site y. Secondly, it is impossible to quantify either the impact or the effect at a local scale due to (for example) a lack of any assessment criteria or thresholds. So, there is not any way to assess it other than to make the general observation. Such a general observation is not considered appropriate for inclusion in an HRA.		Having read the Phosphate Position Paper February 2026 , it is understood that further work is being prepared on this matter and this will be published in April 2026. We will review our position when this work is published.
Support	Test of Soundness	No comments made.	Support noted.	No change required.	Noted.