



# Monmouthshire Replacement Local Development Plan

2018-2033

**Report Of Consultation: Appendix 12**  
**Deposit RLDP Representation Responses**

Volume 2 - RLDP Strategic Framework

## **Contents**

<b>RLDP Strategic Framework .....</b>	<b>1</b>
RLDP Vision (2018-2033) .....	1
RLDP Objectives (2018-2033): Delivering the Vision .....	16
Strategic Policy S1 – Growth Strategy .....	50
Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy .....	158
Policy OC1 – New Built Development in the Open Countryside .....	255
Policy GW1 – Green Wedge Designations .....	264

## RLDP Strategic Framework

### RLDP Vision (2018-2033)

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1209 / Aneurin Bevan University Health Board / Objection	Suggested rewording of the Vision to give additional emphasis to health and equitable design.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues.</p> <p>The Vision includes reference to communities being well-connected with better access to local services/facilities and open spaces and also refers to people enjoying healthier, more sustainable lifestyles by 2033. The Vision appropriately includes emphasis to health, and it is not, therefore, considered appropriate to amend the wording of the Vision as suggested.</p>	No change required.
1803 / Councillor Dr Louise Brown / Objection	The vision and objectives in the current adopted LDP 2011-2021 are more appropriate than those stated in the RLDP vision. The current vision preserves the distinctive character of Monmouthshire's built heritage and the rural character will be preserved and enhanced. The RLDP vision fails to protect our tourism industry. The RLDP vision will sacrifice the vision and result in the over-development of a small geographical section of the southern part of Monmouthshire which is the gateway to Monmouthshire's tourism industry.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The RLDP objectives build upon the objectives of the Adopted LDP taking into account a range of policy drivers that have emerged in recent years, including the Well Being of Future Generations Act 2025, the Gwent Public Service Board (PSB) Well-being Plan and the Council's Community and Corporate Plan.</p> <p>The vision appropriately considers the protection and enhancement of the built heritage, countryside, biodiversity, landscape and environmental assets and character of Monmouthshire in the third bullet point. While the vision doesn't mention tourism specifically, the RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. Accordingly, objective 16 relates specifically to Culture, Health and Welsh Language with specific reference to maximising benefits for the economy, tourism and social well-being.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives. Strategic Policy S12 relates to</p>	No change required.

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		the visitor economy providing a positive framework for development proposals that support Monmouthshire's visitor economy.	
2505 / Councillor Steven Garratt / Support	Support the need for affordable housing to solve the current crisis and zero carbon. This plan sets out to make Monmouthshire an exemplar county council in seeing to achieve this. The plan is a lengthy and detailed programme. It sets out the vision for a more vibrant county and I support it.	Support welcomed.	No change required.
1138 / Raglan Community Council / Objection	Would like the RLDP to be changed to support the community of Raglan and wider community. Raglan CC are supportive of small-scale development to support young families to remain in the community, but object to the proposed medium/large scale development included in the proposed Deposit RLDP.	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The vision does not therefore go into detail about any specific areas. The spatial strategy communicates where future development is located.  Detailed comments on S2 are provided in the relevant section of the Report.	No change required.
2548 / Shirenewton Community Council / Objection	The term exemplar should be defined by policies setting minimum standards for accommodation and facilities etc which does not degrade new developments into back-to-back Victorian terraces of old.	Exemplar development relates to development of a high standard. It relates to more than just good design it considers social, economic, environmental and cultural aspects as well as physical appearance. A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity.	Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: 'Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.'

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1281 / Barratt David Wilson Homes (LRM Planning) / Support	Broadly supportive of the vision, which we note has been scaled back since the previous version of the Plan.	Support welcomed.	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Unlikely the vision will be realised in just 7 years give the constrained growth approach being taken.	The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a review to be considered as part of the annual monitoring requirements post adoption.	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	The level of exemplar affordable housing schemes will be limited due to the overall level of growth. It is most likely that affordability will worsen and the current approach towards growth simply does not allow Monmouthshire to create places that are “affordable housing-led”.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of housing growth are considered in the relevant section of the Report.</p>	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Question the extent to which it will be possible to achieve prosperous and vibrant communities along with businesses that are economically thriving. House building has always been a stimulus to economic growth (from direct jobs to indirect and spin off’s) however, this is being restricted.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	No change required.

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		Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.	
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Communities should be more than sustainable and resilient, indeed, we believe that a key element of the strategy should be to encourage vibrant, active and self-contained communities with a mixture of age groups, activities and land uses in line with PPW12, Placemaking and the Well Being Act. In not addressing needs, this Vision cannot be achieved and as such it may need to be scaled back further.	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is considered the Vision is in accordance with PPW (2024) and provides sufficient emphasis on vibrant and active communities that are demographically balanced. It is not, therefore, considered appropriate to amend the wording of the Vision as suggested.	No change required.
1301 / Melin Homes / Objection	Broadly supportive of vision but it is unlikely that it will be realised in just 7 years. Note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. Question the extent to which it will be possible to achieve prosperous and vibrant communities without sufficient housing growth. Communities should be self-contained communities. The vision should include reference to the agricultural core of the County. Welcome the inclusion of reference to a zero carbon county.	<p>General support noted. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is recognised the Vision does not directly refer to the agricultural core, however, it does include reference to ensuring both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities. The intention is this will respond to issues of rural isolation and difficulties in maintaining services in rural areas.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.	
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	Supports the Vision and Objectives - The plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.	Support welcomed.	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	MHA support the vision for Monmouthshire and confirm that their site at Devauden can help contribute towards this.	Support welcomed.	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	Supports the Vision and Objectives included in the document, and it is considered that with an appropriate Spatial Strategy the plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.	Support welcomed.	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM	Support the Council's vision for Monmouthshire and confirm that their site at Devauden can help contribute towards this. It is noted that MHA have submitted other sites (that are not proposed to be allocated) that could also be made available	Support welcomed.	No change required.

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Planning) / Support	if the need arises to identify further allocations.		
1480 / Edenstone Homes (Boyer Planning) / Support	Supports aspirations to promote demographically balanced, sustainable and resilient communities across Monmouthshire. Land at Penlanlas allocation fully aligns with the key objective to prioritise growth in sustainable location and will facilitate the delivery of much needed affordable and market housing.	Support welcomed.	No change required.
1493 / Vistry Homes Limited / Objection	The RLDP vision and associated housing objective do not acknowledge the identifiable need for market housing or the important role the delivery of market housing plays in addressing affordability issues.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. The growth strategy communicates the scale of future development. It is recognised that the delivery of market housing is often required to bring forward much needed affordable homes, however the emphasis is appropriately placed on meeting affordable housing need to address this key local issue.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	No change required.
1596 / Monmouthshire Housing Association (MHA) (Boyer Planning) / Support	Agree that key issues and drivers, vision and objective identified in the Replacement LDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the plan period as set out within legislation and national policy and guidance, whilst also clearly identifying the relevant	Support welcomed.	No change required.



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	evidence base used to formulate the emerging plan and how this has evolved since the Preferred Strategy (PS).		
1663 / Richborough / Comment	Refer to the vision and paragraph 4.1.1 noting this will be reliant on the policy response set out in the remainder of the RLDP bringing forward an appropriate growth and spatial strategy over the plan period. This strategy must enable distribution of development to the most sustainable settlements.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p> <p>As stated in Planning Policy Wales (2024) housing land should be sited in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and most sustainable lower tier settlements.</p>	No change required.
1683 / Llanarth Estates / Objection	Broadly supportive of vision but it is unlikely that it will be realised in just 7 years. Note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. Question the extent to which it will be possible to achieve prosperous and vibrant communities without sufficient housing growth. Communities should be self-contained communities. The vision should include reference to the agricultural core of the County. Welcome the inclusion of reference to a zero carbon county.	<p>General support noted. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is recognised the Vision does not directly refer to the agricultural core, however, it does include reference to ensuring both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities. The intention is</p>	No change required.

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		<p>this will respond to issues of rural isolation and difficulties in maintaining services in rural areas.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
1692 / Edenstone Homes (Highlight Planning) / Support	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation	Support welcomed.	No change required.
1736 / Bellway Homes / Support	Bellway Homes agree in principle that Monmouthshire is subject to a number of challenges which have caused significant delay in the plan making process and note the vision.	Support welcomed.	No change required.
1965 / Monmouthshire Housing Association (MHA) (GJPlanning) / Support	In principle, MHA support the key issues, challenges, vision and objectives of the RLDP.	Support welcomed.	No change required.
2416 / Edenstone Homes / Support	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation.	Support welcomed.	No change required.
2419 / Edenstone	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is	Support welcomed.	No change required.

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Homes / Support	embedded throughout the plan's preparation.		
2951 / Tirion Homes / Objection	<p>Broadly supportive of vision but it is unlikely that it will be realised in just 7 years. Note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. Question the extent to which it will be possible to achieve prosperous and vibrant communities without sufficient housing growth. Communities should be self-contained communities. The vision should include reference to the agricultural core of the County. Welcome the inclusion of reference to a zero carbon county.</p>	<p>General support noted. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is recognised the Vision does not directly refer to the agricultural core, however, it does include reference to ensuring both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities. The intention is this will respond to issues of rural isolation and difficulties in maintaining services in rural areas.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
2952 / Candleston Homes / Objection	<p>Broadly supportive of vision but it is unlikely that it will be realised in just 7 years. Note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. Question the extent to which it will be possible to achieve prosperous and vibrant communities without sufficient housing growth. Communities should be self-contained communities. The vision should include</p>	<p>General support noted. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence,</p>	No change required.

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	reference to the agricultural core of the County. Welcome the inclusion of reference to a zero carbon county.	<p>and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is recognised the Vision does not directly refer to the agricultural core, however, it does include reference to ensuring both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities. The intention is this will respond to issues of rural isolation and difficulties in maintaining services in rural areas.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
2954 / Sero / Objection	Broadly supportive of vision but it is unlikely that it will be realised in just 7 years. Note that the level of exemplar affordable housing schemes will be limited due to the overall low level of growth. Question the extent to which it will be possible to achieve prosperous and vibrant communities without sufficient housing growth. Communities should be self-contained communities. The vision should include reference to the agricultural core of the County. Welcome the inclusion of reference to a zero carbon county.	<p>General support noted. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. It is recognised the Vision does not directly refer to the agricultural core, however, it does include reference to ensuring both urban and rural areas are well-connected with better access to local services and facilities, open space and employment opportunities. The intention is this will respond to issues of rural isolation and difficulties in maintaining services in rural areas.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.

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<p>1366 / Carney Sweeney Ltd / Objection</p>	<p>Generally support the RLDP Vision, but do not believe that all elements will be 'exemplar affordable housing-led'. There is no definition which further explains what 'exemplar' means in this context. Suggest that the term 'exemplar' is defined to refer to 'a standard of good design' only. Not all development needs to include affordable housing, still less led by it. To be affordable housing-led, schemes would need to be supported by public subsidy/grant, which cannot be guaranteed.</p>	<p>General support welcomed. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues.</p> <p>Exemplar development relates to development of a high standard. It relates to more than just good design it considers social, economic, environmental and cultural aspects as well as physical appearance. A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity.</p> <p>The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and accordingly is appropriately reflected in the RLDP’s vision, objectives and policy framework. A site being affordable housing-led does not automatically mean it needs to be supported by public subsidy/grant. The priority is the delivery of affordable housing and in accordance with Welsh Government guidance the delivery of affordable housing has been maximised based on viability evidence in the form of the High-Level Viability Assessment (HLVA). The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>Site promoters of the proposed site allocations have also completed site specific financial viability assessments (FVA) to support their proposals to demonstrate that their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements set out within the site allocation policies, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>The affordable housing framework is set out in Strategic Policy S7. Welsh Government support this approach in their representation on the Deposit RLDP noting that they strongly support affordable housing-led sites as there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	<p>Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: ‘Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects as well as physical appearance.’</p>

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1029 / Ann Langford / Objection	Plan should be based on supplying forecasted need not correcting the age distribution of the county.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues.</p> <p>One of the key issues for Monmouthshire is that the population is getting older, the 2021 Census identified that nearly 26% of the population in Monmouthshire was over the age of 65 compared to a Welsh average of 21%, both the under 16's and working age populations (16-64) were below the Welsh average. This results in a smaller economically active population which makes Monmouthshire less attractive for potential businesses impacting on future economic prospects. The retention of a younger population is key to increasing the sustainability of the economy and public services which will have a positive impact for communities as a whole.</p>	No change required.
1653 / John Bromley / Comment	The plan does put an emphasis on development in Severnside and the M4 corridor but otherwise just spreads housing demand across the designated towns and secondary settlements. The M4 corridor is the obvious growth potential so in isolation Severnside is the correct priority, however Newport is sitting on an enormous brownfield site at Llanwern on the same corridor just over the Monmouthshire boundary and there is no recognition how this impacts Severnside.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The vision does not therefore go into detail about any specific areas. The spatial strategy communicates where future development is located.</p> <p>Regarding consideration of Newport, paragraphs 2.2.2 and 2.2.3 in the Influences on the RLDP section refer to neighbouring local authorities. Paragraph 2.2.5 refers to additional information being set out in Appendix 5. Appendix 5 relates to regional collaboration and linkages with neighbouring local authorities. This includes recognition that Newport's Preferred Strategy seeks to prioritise the redevelopment and regeneration of land in the urban area, including the continued regeneration of the former Llanwern Steelworks at Glan Llyn. Appendix 5 also notes that Monmouthshire collaborated with Newport and discussed whether the Council could utilise any of their brownfield land to accommodate any of Monmouthshire's growth over the Plan period. However, it was concluded that Newport has no surplus brownfield land within the authority to accommodate growth from elsewhere. It is not, therefore, considered appropriate to include a specific reference to Newport as suggested.</p> <p>Detailed comments on S2 are provided in the relevant section of the Report.</p>	No change required.
3361 / Mr Danny	RLDP recognises the need for affordable housing around Chepstow, Caldicot, Severnside. Inclusion of former MOD site	Support welcomed.	No change required.

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Bernheim / Support	utilises former brownfield land, encourages employment with addition of residential care/nursing home which is desperately needed due to demand in local community.		
3732 / Mr Jamie Sage / Objection	Plan overall short on believable detail, too obsessed on climate change, net zero, active travel when people want to know where and what is being provided in terms of jobs, health services, the details of affordable housing, necessity for commuting etc. Comments on unfeasibility of building on flood plains, lack of provision of public transport to back up active travel and move away from cars. Need to be realistic about Climate Change and mitigation rather than preventing.	<p>The key issues, challenges and opportunities have been identified through the RLDP preparation process with a summary of the key economic, environmental, social and cultural issues included within Paragraph 3.1.1 of the Plan. Further detail is set out in the RLDP Issues, Vision and Objectives Paper and Appendix 6 of the Deposit RLDP.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p>	No change required.
3763 / Natalie Sandercock / Objection	Concerns there is over emphasis on the need for housing development and that affordable house should be concentrated in growth areas outside of Monmouthshire. The plan should instead focus on creating sustainable travel links to commercial centre outside of the county.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues.</p> <p>In their response to the Deposit Plan consultation Welsh Government note 'Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region but reflects the urgent need to increase the supply of affordable housing in Monmouthshire'.</p> <p>The RLDP vision also includes the aim of providing improved access to public transport and active travel opportunities.</p>	No change required.
3972 / Mrs Sue Young / Objection	I do not consider Caldicot to be 'an exemplar well connected place' for existing residents' further development will require increased infrastructure and facilities. 'New strategic sites within walking distance of existing town	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The vision does not therefore go into	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>centres is intended to reduce carbon emissions' - even with improved pathways cars are still going to be used for shopping and taking children to the comprehensive school thus increasing emissions. The increased net outflow of commuters will also increase emissions and congestion. Plan does not state how you plan to attract younger people - is some of the housing going to be ringfenced for younger and or local people?</p>	<p>detail about any specific areas. The spatial strategy communicates where future development is located.</p> <p>The key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. The RLDP can provide measures to encourage the younger population to live and work in Monmouthshire.</p> <p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection. There are, however, exceptions where there is an overriding need such as homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy which specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate their rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	
<p>3984 / Mr Tim Monckton / Objection</p>	<p>Plans to build on open countryside contradict the vision, particularly environment and goal acknowledging a climate emergency. Goals include urgently needed affordable housing but only 50% will be affordable housing. Infrastructure is listed</p>	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the</p>	<p>No change required.</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>as a goal but the plan doesn't explain other infrastructure needed i.e. schools, health care.</p>	<p>policies and allocations provide the planning framework to help deliver the objectives.</p> <p>The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and accordingly is appropriately reflected in the RLDP’s vision, objectives and policy framework. In accordance with Welsh Government guidance the delivery of affordable housing has been maximised based on viability evidence in the form of the High-Level Viability Assessment (HLVA). The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing framework is set out in Strategic Policy S7. Welsh Government support this approach in their representation on the Deposit RLDP noting that they strongly support affordable housing-led sites as there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>Regarding Infrastructure, adequate and efficient infrastructure is recognised in Planning Policy Wales (2024) as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering sustainable development and to meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan. Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development. In addition to Strategic Policy S6 an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans sites allocations. The IDP is included within Appendix 8 of the RLDP.</p>	

## RLDP Objectives (2018-2033): Delivering the Vision

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1209 / Aneurin Bevan University Health Board / Comment	Objective 8 - welcome a specific objective related to health and wellbeing, however suggest word changes to the objective to reflect wider deterrents that affect health and well-being including the built and natural environment.	<p>General support for objective 8 welcomed.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context, while the policies and allocations provide the planning framework to help deliver the objectives. The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context.</p> <p>The Council acknowledges the importance of maximising the contribution of the built and natural environment to the health and well-being of the community, including in new developments. Some of the information suggested by ABUHB is included under other objectives, such as Objective 11, and policies including Strategic Policy S3 (Sustainable Placemaking and High-Quality Design) and Policy PM1 (Creating Well-designed Places) and it is considered further supporting detail would best fit within Supplementary Planning Guidance (SPG) associated with these policies. Appendix 11 identifies that a Placemaking and Design SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p> <p>It is, therefore, not considered necessary to amend the wording of Objective 8 as suggested.</p>	No change required.
1803 / Councillor Dr Louise Brown / Objection	Tourism should be a main objective of the MCC vision and plan, it was objective 16 of the preferred strategy part of the previous consultation.	<p>The RLDP objectives build upon the objectives of the Adopted LDP taking into account a range of policy drivers that have emerged in recent years, including the Well Being of Future Generations Act 2025, the Gwent Public Service Board (PSB) Well-being Plan and the Council's Community and Corporate Plan. Objective 16 remains the same as it was at the time of the Preferred Strategy.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon homes in exemplar places, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. Importantly</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p> <p>The RLDP recognises that tourism plays a key role in the local economy of Monmouthshire. Accordingly, objective 16 relates specifically to Culture, Health and Welsh Language with specific reference to maximising benefits for the economy, tourism and social well-being.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives. Strategic Policy S12 relates to the visitor economy providing a positive framework for development proposals that support Monmouthshire’s visitor economy.</p>	
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>Objectives 8, 9 and 10 will not be achieved in the same way it has not been achieved in the last LDP- the millions of grant funding required to ensure the provision of 50% affordable housing is unlikely.</p>	<p>The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>In conformity with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA site promoters for site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	Objective 9 will not be achieved - the population getting older is simply a symptom across the whole of Wales and England.	<p>The key issues, challenges and opportunities have been identified through the RLDP preparation process with a summary of the key economic, environmental, social and cultural issues included within Paragraph 3.1.1 of the Plan. Further detail is set out in the RLDP Issues, Vision and Objectives Paper and Appendix 6 of the Deposit RLDP.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. The RLDP can provide measures to encourage the younger population to live and work in Monmouthshire.</p>	No change required.
1803 / Councillor Dr Louise Brown / Objection	The quality of life and the health and well-being of the population in objective 8 will not be enhanced by the extra pollution caused by increased traffic in the Chepstow and Caldicot area of Monmouthshire by the proposed additional housing concentrated in these areas. It will be unsustainable due to the lack of road infrastructure, contrary to the vision.	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon homes in exemplar places, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p> <p>The RLDP objectives include a specific objective (objective 14) that relates to infrastructure.</p> <p>Adequate and efficient infrastructure is recognised in Planning Policy Wales (2024) as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>sustainable development and to meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan.</p> <p>Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development providing the overarching framework for all types of development. In addition to Strategic Policy S6 an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans sites allocations.</p> <p>The IDP is included within Appendix 8 of the RLDP.</p>	
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>Objective 17 will not be achieved as air quality will not be improved by extra traffic from extra housing concentrated in a small area of South Monmouthshire.</p>	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues of delivering essential affordable homes at pace and scale, responding to the climate and nature emergency by delivering net zero carbon homes in exemplar places, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p> <p>The RLDP objectives include a specific objective (objective 14) that relates to infrastructure.</p> <p>Adequate and efficient infrastructure is recognised in Planning Policy Wales (2024) as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. The provision of a range of services and facilities is essential to delivering sustainable development and to meeting diverse community needs, and the provision of appropriate infrastructure will be supported by the Plan.</p> <p>Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development providing the overarching framework for all types of development. In addition to Strategic Policy S6 an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans sites allocations.</p> <p>The IDP is included within Appendix 8 of the RLDP.</p>	
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>Objective 14 on infrastructure fails to even mention or consider the lack of infrastructure in the Southern area of Monmouthshire with no mention at all of road infrastructure which is at breaking point in Chepstow and surrounding areas.</p>	<p>Adequate and efficient infrastructure is recognised in Planning Policy Wales (2024) as being crucial for economic, social and environmental sustainability. The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. Objective 14 reflects Issue 31 it does not relate to a specific area of Monmouthshire; it relates to the County as a whole. The provision of appropriate infrastructure will be supported by the Plan.</p> <p>Strategic Policy S6 relates to infrastructure requirements essential to delivering sustainable development providing the overarching framework for all types of development. In addition to Strategic Policy S6 an Infrastructure Delivery Plan (IDP) has been prepared and identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans sites allocations.</p> <p>The IDP is included within Appendix 8 of the RLDP.</p>	<p>No change required.</p>
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>Objective 6 - The use of BMV for development in the vision is contrary to Planning Policy Wales. The argument is that MCC has an excess of BMV land and limited brownfield land. However the best agricultural land is a finite resource across the whole of Wales and needs to be preserved for future generations and for local food growth. There is nothing in this RLDP about allotments being provided in all housing developments and to use council owned farmland in this way as well as the priority for farmers to use BMV land for</p>	<p>In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives. Regarding allotment provision, Policy CI2 relates to the provision of formal and informal open space and</p>	<p>No change required.</p>

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	farming and food production on the basis that this is a finite asset.	allotments/community growing areas providing a supportive framework for community growing as part of new development proposals.	
1803 / Councillor Dr Louise Brown / Objection	Objective 4 on flooding is not being taken seriously by the removal of the current policy on this which provides a local reminder of the importance of the national policy in TAN15. It is no good arguing that there is a national policy, as the local policy should refer to the need to comply with TAN15.	Objective 4 relates specifically to flood risk taking into account the risk of existing and future flooding.  The RLDP ensures new built development is located away from flood risk areas and includes policies such as S4 to respond to the climate emergency and CC1 relating to sustainable drainage systems.	No change required.
1255 / Home Builders Federation (HBF) / Objection	Objective 10 - suggested word change - relates to housing in its headline but its more detailed objective only references affordable homes. Considers that reference should be made to all tenures of housing, as this will support the delivery of 'mixed sustainable places' and economic growth both requirements/aspirations of the plan.	The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework.  The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.  It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County.  Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.  It is not, therefore, considered appropriate to amend objective 10 as suggested.	No change required.
1255 / Home Builders Federation	Objectives 10/11 - question the need to refer to housing schemes as exemplar - note	The RLDP vision notes in that by 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
(HBF) / Objection	that no other objective require an 'exemplar' solution. Considered unnecessary	<p>communities for all. Exemplar development relates to development of a high standard. It relates to more than just good design it considers social, economic, environmental and cultural aspects as well as physical appearance.</p> <p>Objectives 10 and 11 reflect the wording of the vision It is not, therefore, considered appropriate to amend the wording of the objectives as suggested.</p>	
1367 / Abergavenny and District Civic Society / Comment	Support the vision and objectives of the Plan, however are not convinced that the attempt to correct the ageing population via the development plan process is valid as no evidence to support this is provided.	<p>General support for the vision and objections is welcomed.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives. The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. The RLDP can provide measures to encourage the younger population to live and work in Monmouthshire.</p> <p>The affordable housing framework is set out in Strategic Policy S7. Welsh Government support this approach in their representation on the Deposit RLDP noting that they strongly support affordable housing-led sites as there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	No change required.
1376 / Abergavenny Transition Town / Objection	No evidence provided that demonstrates that planning policy on new homes provision through private sector development can lead to a rebalancing of a county's demographic make-up. This is unrealistic and should be	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>written out of the plan. However, do agree that having a more balanced demographic in the County is a worth objective - needs another method of achieving it.</p>	<p>planning framework to help deliver the objectives. The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. The RLDP can provide measures to encourage the younger population to live and work in Monmouthshire.</p> <p>The affordable housing framework is set out in Strategic Policy S7. Welsh Government support this approach in their representation on the Deposit RLDP noting that they strongly support affordable housing-led sites as there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	
<p>2532 / Cwmpas Community Housing / Comment</p>	<p>Cwmpas sees a clear synergy between the key objectives and vision statement and community led affordable housing programmes and projects. Community-led housing development is where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. Reference to community led housing in objectives 6 and 8 would provide a positive contribution in furthering the diverse means by which affordable housing can be delivered.</p>	<p>Objective 6 relates to Land with a primary focus on promoting the efficient use of land, while objective 8 relates to health and well-being. It is not considered appropriate to include a direct reference to community-led housing development in either of these objectives. Any community-led affordable housing will be considered on a site-by-site basis, and any such proposals must adhere to Strategic Policy S7 as well as other policies set out within the RLDP. It is not therefore considered appropriate to amend the objectives as suggested.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2548 / Shirenewton Community Council / Objection	Objective 10 - term exemplar should be defined by policies, setting minimum standards for accommodation and facilities of each housing unit and lower building densities which does not degrade new developments into the back to back Victorian terraces of old.	<p>Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.</p> <p>A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity. It is not, therefore, considered appropriate to amend objective 10 as suggested.</p>	Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: 'Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.'
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	Fundamentally concerned about the level of disconnect between the evidence base, the issues faced and the constrained level of growth that is now proposed. We recognise the reasons for this, however, the evidence base itself confirms that the general level of growth proposed will not address the challenges and by implication the Plan will not be able to achieve its vision or objectives.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of housing growth are considered in the relevant section of the Report.</p>	No change required.
1281 / Barratt David Wilson Homes (LRM	Refers to objective 1. Supportive of the aspiration but question whether this is achievable with the approach to growth sought.	General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Planning) / Comment		<p>concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Refers to objective 2. Note in order to support town centres it is important that a commensurate level of growth is sought.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
<p>1281 / Barratt David Wilson Homes (LRM Planning) / Support</p>	<p>Refers to objective 10. Support the aspiration to provide affordable housing. Choice and range of house types must be seen as being a key means to address the growing affordability issues.</p>	<p>General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).</p>	<p>No change required.</p>
<p>1281 / Barratt David Wilson Homes (LRM Planning) / Support</p>	<p>Refers to objective 11. Supportive of the creation of sustainable places and believe that ensuring sustainable growth is key to the future well-being and vibrancy of communities.</p>	<p>Support welcomed.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1301 / Melin Homes / Objection	Objective 1: supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.	<p>General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	No change required.
1301 / Melin Homes / Objection	Objective 2: In order to support Town Centre it is important that commensurate level of growth is sought.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
1301 / Melin Homes / Objection	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>market for instance to allow the ageing population to downsize to free up larger family homes for younger families.</p>	<p>ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
<p>1301 / Melin Homes / Objection</p>	<p>Objective 10: Support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.</p>	<p>General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1301 / Melin Homes / Support	Objective 11: Supportive of the creation of sustainable places.	Support welcomed.	No change required.
1301 / Melin Homes / Objection	Objective 13: A distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Often the smaller more remote settlements where property supply is limited and prices are highest. Proportionate growth is therefore appropriate in these locations provided appropriate infrastructure and facilities exist. This should not be at the expense of proposals that seek to address much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural 'way of life' ought to be the objective rather than large estates along the M4. Refers to difficulties faced as a result of Brexit and lack of trade deals meaning being self-sufficient and able to produce our own food is of primary importance.	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 13 refers to rural communities generally providing support for affordable homes and development opportunities of an appropriate scale and location in rural areas. It is not therefore considered appropriate to distinguish between the types of rural settlements.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and most sustainable lower tier settlements.</p> <p>Supporting sustainable economic growth is a key Council priority, the RLDP recognises that food growing, and agriculture plays an important role in Monmouthshire’s economy.</p> <p>It is not, therefore, considered appropriate to amend objective 13 as suggested.</p>	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	Supports the Vision and Objectives if the plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	Supports the Vision and Objectives included in the document, and it is considered that with an appropriate Spatial Strategy the plan can provide a means of seeking to work towards this Vision through distributing development across sustainable urban and rural settlements, thereby supporting existing facilities, and facilitating new services, consequently reducing the need to travel.	Support welcomed.	No change required.
1493 / Vistry Homes Limited / Objection	The RLDP vision and associated housing objective do not acknowledge the identifiable need for market housing or the important role the delivery of market housing plays in addressing affordability issues.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework. The growth strategy communicates the scale of future development.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County.</p>	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Refer to Objective 10 and note this is overwhelmingly focussed on affordable housing delivery. State while there is a clear need for affordable housing provision it does not mean private market housing should be discounted altogether. Request Objective 10 be amended so that it acknowledges the	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework. The growth strategy communicates the scale of future development.	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	vital contribution that open market housing plays in overall housing delivery and affordable housing delivery.	<p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County. It is not, therefore, considered appropriate to amend the wording of objective 10 as suggested.</p>	
1596 / Monmouthshire Housing Association (MHA) (Boyer Planning) / Support	Agree that key issues and drivers, vision and objective identified in the Replacement LDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the plan period as set out within legislation and national policy and guidance, whilst also clearly identifying the relevant evidence base used to formulate the emerging plan and how this has evolved since the Preferred Strategy (PS).	Support welcomed.	No change required.
1663 / Richborough / Comment	Refer to objective 1 noting reference should be made to the increased role that home and agile working can be expected to make over the plan period as recognised elsewhere in the RLDP.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives. Issue 7 recognises that higher levels of those in employment in Monmouthshire work at home compared to the Welsh average (2021 Census) noting efficient digital infrastructure is essential to support home working.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 1 relates to economic growth/employment and while there is no direct reference would provide support for home and agile working. Objective 15 should however also be referred to relating to accessibility noting a need for improved internet connectivity.</p> <p>It is not, therefore, considered appropriate to amend the wording of objective 1 as suggested.</p>	
1663 / Richborough / Objection	Refer to objective 2 stating as worded no reference is made to Raglan which is designated as a local centre, also state Bulwark Local Centre should also be listed for consistency.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, vision, objectives and supporting evidence base for the Plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges, therefore, set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues. Importantly, the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p> <p>The policy framework in Strategic Policy S14 and policy RC3 recognise the importance of the Local Centres. The emphasis of objective 2 primarily refers to town centres, however, it is recognised that it would be beneficial to also include reference to local centres, as described in the headline. Objective 2 will be updated accordingly.</p>	Include the following additional wording to Objective 2: 'along with the County's local centres' after the reference to Usk.
1663 / Richborough / Comment	Welcome recognition that it is not always possible to protect BMV in Monmouthshire or develop on greenfield sites. State this provides important context for the search sequence.	General support welcomed. In their representation on the Deposit RLDP Welsh Government provide support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV how this is justified. Welsh Government note the Deposit RLDP considers and balances the overriding need for allocations involving BMV and, recognise that while significant areas of BMV will be developed the LPA has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1663 / Richborough / Support	Support objective 9 noting this is important if the issues identified in Section 3 of the plan are to be addressed, state to do so sufficient levels of growth must be planned for, and in the right locations.	Support welcomed.	No change required.
1663 / Richborough / Objection	Support provision of affordable housing but state mixed and balanced communities must be created bringing forward both affordable and market housing. State the objective should be changed to make specific reference to a choice of homes, including both market and affordable. Request the wording be amended to add in market as well as affordable housing.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the vision should be unique to local circumstances with overarching objectives that respond to the key issues. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 10 is appropriately placed on meeting urgently needed affordable housing in the County. It is not, therefore, considered appropriate to amend the wording of objective 10 as suggested.</p>	No change required.
1663 / Richborough / Objection	Agree development opportunities are needed to sustain existing rural communities but note this will need to include a range of housing types both affordable and market. Request the wording be amended to add in market as well as affordable homes.	<p>The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 13 is appropriately placed on meeting urgently needed affordable housing in the County.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>It is not, therefore, considered appropriate to amend objective 13 as suggested.</p>	
1663 / Richborough / Support	Support objective 15.	Support welcomed.	No change required.
1683 / Llanarth Estates / Objection	Objective 1: supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.	<p>General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	No change required.
1683 / Llanarth Estates / Objection	Objective 2: In order to support Town Centre it is important that commensurate level of growth is sought.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in	No change required.

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		<p>general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
1683 / Llanarth Estates / Objection	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
1683 / Llanarth Estates / Objection	Objective 10: Support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.	<p>General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).</p>	
1683 / Llanarth Estates / Support	Objective 11: Supportive of the creation of sustainable places.	Support welcomed.	No change required.
1683 / Llanarth Estates / Objection	Objective 13: A distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Often the smaller more remote settlements where property supply is limited and prices are highest. Proportionate growth is therefore appropriate in these locations provided appropriate infrastructure and facilities exist. This should not be at the expense of proposals that seek to address much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural 'way of life' ought to be the objective rather than large estates along the M4.	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 13 refers to rural communities generally providing support for affordable homes and development opportunities of an appropriate scale and location in rural areas. It is not therefore considered appropriate to distinguish between the types of rural settlements.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and most sustainable lower tier settlements.</p> <p>Supporting sustainable economic growth is a key Council priority, the RLDP recognises that food growing, and agriculture plays an important role in Monmouthshire's economy.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		It is not, therefore, considered appropriate to amend objective 13 as suggested.	
1692 / Edenstone Homes (Highlight Planning) / Support	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation	Support welcomed.	No change required.
1694 / The Stantonbury Building and Development Company / Support	Support Objective 10 and the need to provide urgently needed affordable housing within exemplar, mixed, sustainable and well-connected places both for existing and future residents. The RLDP should seek to meet this in full.	Support welcomed.	No change required.
1965 / Monmouthshire Housing Association (MHA) (GJPlanning) / Support	In principle, MHA support the key issues, challenges, vision and objectives of the RLDP.	Support welcomed.	No change required.
2416 / Edenstone Homes / Support	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is embedded throughout the plan's preparation	Support welcomed.	No change required.
2419 / Edenstone Homes (Highlight	The Vision and RLDP Objectives comply and integrate with the well-being goals and ways of working and this will help ensure that the Well-being of Future Generations Act is	Support welcomed.	No change required.

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Planning) / Support	embedded throughout the plan's preparation		
2463 / Barwood Development Securities Ltd / Objection	Objectives 10/11 - support objective of achieving good design but are concerned by the term 'exemplar'. No other objectives use the term, nor is there a definition contained within the RLDP. This could result in subjective decisions being made. Suggest term 'exemplar' is either further explicitly defined or the objective refers to 'a standard of good design' only.	<p>Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.</p> <p>A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity. It is not, therefore, considered appropriate to amend objective 10 and 11 as suggested.</p>	<p>Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: 'Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.'</p>
2951 / Tirion Homes / Objection	Objective 1: supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.	<p>General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2951 / Tirion Homes / Objection	Objective 2: In order to support Town Centre it is important that commensurate level of growth is sought.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
2951 / Tirion Homes / Objection	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
2951 / Tirion Homes / Objection	Objective 10: Support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing	General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.</p>	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).</p>	
<p>2951 / Tirion Homes / Support</p>	<p>Objective 11: Supportive of the creation of sustainable places.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
<p>2951 / Tirion Homes / Objection</p>	<p>Objective 13: A distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Often the smaller more remote settlements where property supply is limited and prices are highest. Proportionate growth is therefore appropriate in these locations provided appropriate infrastructure and facilities exist. This should not be at the expense of proposals that seek to address much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural 'way of life' ought to be the</p>	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 13 refers to rural communities generally providing support for affordable homes and development opportunities of an appropriate scale and location in rural areas. It is not therefore considered appropriate to distinguish between the types of rural settlements.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	objective rather than large estates along the M4.	<p>development in the primary settlements and most sustainable lower tier settlements.</p> <p>Supporting sustainable economic growth is a key Council priority, the RLDP recognises that food growing, and agriculture plays an important role in Monmouthshire’s economy.</p> <p>It is not, therefore, considered appropriate to amend objective 13 as suggested.</p>	
2952 / Candleston Homes / Objection	Objective 1: supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.	<p>General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	No change required.
2952 / Candleston Homes / Objection	Objective 2: In order to support Town Centre it is important that commensurate level of growth is sought.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2952 / Candleston Homes / Objection	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
2952 / Candleston Homes / Objection	Objective 10: Support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.	<p>General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County’s affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).	
2952 / Candleston Homes / Support	Objective 11: Supportive of the creation of sustainable places.	Support welcomed.	No change required.
2952 / Candleston Homes / Objection	Objective 13: A distinction must be made between small, isolated settlements where people have chosen to live and the wider rural community as a whole. Often the smaller more remote settlements where property supply is limited and prices are highest. Proportionate growth is therefore appropriate in these locations provided appropriate infrastructure and facilities exist. This should not be at the expense of proposals that seek to address much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural 'way of life' ought to be the objective rather than large estates along the M4.	<p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 13 refers to rural communities generally providing support for affordable homes and development opportunities of an appropriate scale and location in rural areas. It is not therefore considered appropriate to distinguish between the types of rural settlements.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and most sustainable lower tier settlements.</p> <p>Supporting sustainable economic growth is a key Council priority, the RLDP recognises that food growing, and agriculture plays an important role in Monmouthshire's economy.</p> <p>It is not, therefore, considered appropriate to amend objective 13 as suggested.</p>	No change required.
2954 / Sero / Objection	Objective 1: supportive of the aspiration within the policy, however, we would question whether this is achievable with the approach to growth sought.	General support for objective 1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of economic growth are considered in the relevant section of the Report.</p>	
2954 / Sero / Objection	Objective 2: In order to support Town Centre it is important that commensurate level of growth is sought.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	No change required.
2954 / Sero / Objection	Objective 9: Concerned that the lower levels of growth sought will exacerbate the existing ageing population. Inelasticity of supply in the housing market means that affordability will only increase as more people chase a limited pool of homes. Indeed, there needs to be a wide range of choice in the housing market for instance to allow the ageing population to downsize to free up larger family homes for younger families.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision, Objectives and Strategy are positive and sufficiently aspirational.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations.</p> <p>Detailed comments on S1 relating to the level of growth are considered in the relevant section of the Report.</p>	
2954 / Sero / Objection	Objective 10: Support the aspiration to provide affordable housing. However, choice and range of house types must be seen as being a key means to address the growing affordability issues. Affordable housing needs to be provided where the employment opportunities exist in order to support and maintain existing industries and encourage retention of skills.	<p>General support for objective 10 is welcomed. The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs. Objective 10 reflects this approach and refers to exemplar, mixed, sustainable and well-connected places.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. Accordingly, a specific policy relating to Housing Mix is included within the RLDP (Policy H8).</p>	No change required.
2954 / Sero / Support	Objective 11: Supportive of the creation of sustainable places.	Support welcomed.	No change required.
2954 / Sero / Objection	Objective 13: A distinction must be made between small, isolated settlements where people have chosen to live and the wider	The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>rural community as a whole. Often the smaller more remote settlements where property supply is limited and prices are highest. Proportionate growth is therefore appropriate in these locations provided appropriate infrastructure and facilities exist. This should not be at the expense of proposals that seek to address much wider rural society and economy. Thriving and sustainable settlements that are founded within the rural 'way of life' ought to be the objective rather than large estates along the M4.</p>	<p>provide the basis for a sound plan in terms of their fit, appropriateness and deliverability. Objective 13 refers to rural communities generally providing support for affordable homes and development opportunities of an appropriate scale and location in rural areas. It is not therefore considered appropriate to distinguish between the types of rural settlements.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations identified in the RLDP and all other proposals for new housing development must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and most sustainable lower tier settlements.</p> <p>Supporting sustainable economic growth is a key Council priority, the RLDP recognises that food growing, and agriculture plays an important role in Monmouthshire’s economy.</p> <p>It is not, therefore, considered appropriate to amend objective 13 as suggested.</p>	
<p>1366 / Carney Sweeney Ltd / Comment</p>	<p>Objective 10 - Support the objective, however, concerned over the use of the term 'exemplar'. There is no definition contained in the RLDP, potentially leading to subjective decisions. Suggest that the term 'exemplar' is either further defined or refers to 'a standard of good design'.</p>	<p>General support welcomed.</p> <p>Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.</p> <p>A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity. It is not, therefore, considered appropriate to amend objective 10 as suggested.</p>	<p>Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: 'Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.'</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1366 / Carney Sweeney Ltd / Comment	Objective 11 - Support the objective, however, concerned over the use of the term 'exemplar'. There is no definition contained in the RLDP, potentially leading to subjective decisions. Suggest that the term 'exemplar' is either further defined or refers to 'a standard of good design'.	<p>General support welcomed.</p> <p>Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.</p> <p>A definition of exemplar will be included in the RLDP Glossary of Terms to avoid any ambiguity. It is not, therefore, considered appropriate to amend objective 11 as suggested.</p>	<p>Include the following definition of exemplar development in the RLDP Glossary of Terms to provide clarity: 'Exemplar development relates to development of a high standard. It relates to more than just good design: it considers social, economic, environmental and cultural aspects, as well as physical appearance.'</p>
1366 / Carney Sweeney Ltd / Objection	Objective 13 — Building sustainable rural communities and strengthening the rural economy will require homes of all tenures, not just affordable homes. Should be reworded to read 'to sustain existing rural communities as far as possible by providing homes (including affordable homes) and development opportunities ...'	<p>The delivery of affordable housing is a key national priority. The provision of affordable housing is also a key priority for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The Plan's objectives are sufficiently aspirational yet also achievable within a spatial planning context. They respond to and deliver upon the Plan's key issues including delivery of essential affordable homes at pace and scale. Importantly the objectives provide the basis for a sound plan in terms of their fit, appropriateness and deliverability.</p> <p>It is recognised that the delivery of market housing is often required to bring forward affordable homes, however the emphasis of objective 13 is appropriately placed on meeting urgently needed affordable housing in the County.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	No change required.

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		It is not, therefore, considered appropriate to amend objective 13 as suggested.	
1472 / Powells / Support	Refer to the HA18 Land at Redd Landes Shirenewton site providing detail of how it supports multiple RLDP objectives including Objective 10 (Housing), Objective 9 (Demography) and Objective 11 (Placemaking).	Support welcomed. A site specific response is provided in relation to comments on HA18.	No change required.
1944 / John Burrows / Support	Generally, supportive of the Deposit RLDP. Good work. Well done. One general observation is that ' <i>affordable housing</i> ' needs to be clarified - it probably needs to be ' <i>housing rented from a Housing Association</i> ' (or equivalent) as other methods of affordability seem to lose both the affordability and the later availability of what was originally ' <i>affordable</i> ' houses. Perhaps there needs to be a policy about the availability of homes for affordable rent.	Support welcomed. Paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this is where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This definition is in line with the definition in Welsh Government's Planning Policy Wales (2024).	No change required.
2299 / Mr Maurice Barnes / Comment	Pleased with the main objectives of the Plan but clarity must be made how the 50% ' <i>affordable</i> ' housing will actually be affordable for most people unless it is ' <i>social</i> ' housing.	General support welcomed. Paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this is where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This definition is in line with the definition in Welsh Government's Planning Policy Wales (2024).	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2947 / Mr R Lewis / Objection	The prioritisation of a greenfield site over brownfield alternatives contradicts the RLDP's objective of maximising development on previously developed land.	Paragraph 3.1.6 of the RLDP refers to the site search sequence outlined in PPW (2024) which prioritises the use of suitable and sustainable previously developed land before considering greenfield sites. While there is a preference for maximising opportunities for development on previously developed land it is recognised in 3.1.6, 6.4.7 and the RLDP Objective 6 that brownfield opportunities are limited in Monmouthshire.	No change required.
3353 / Dr Alison Weightman / Comment	Gwent Wellbeing Plan Steps in table mention to "Take Action" but don't explain the plan of action.	Paragraph 5.1.3 notes that the objectives are aligned with the Gwent Public Service Board (PSB) Well-being Plan steps in Table 1. The Gwent PSB steps are therefore listed within the relevant column verbatim. For further detail on the Gwent PSB steps please refer to the Gwent PSB website.	No change required.
3445 / Mrs Heidi McAllister / Objection	Refers to objective 1 and notes in terms of small businesses in town - these are disadvantaged by the lack of free parking and complicated parking charges	While objective 1 seeks to sustain and enhance the Town and Local centres, the County's car parks, and any associated parking charges sit outside the scope of the RLDP.	No change required.
3614 / Dr Delyth / Comment	Reference to education facilities needs to include tertiary education not just schools including, apprenticeships and staff development e.g. NVQs.	The references within the objectives in Table 1 relate to education generally. It is not, therefore, considered appropriate to amend Table 1 as suggested.	No change required.
3836 / Steve Hoselitz / Objection	Find administrative jargon makes some of the aspirations hard to understand it is unlikely, that many residents will understand what you mean in practice.	In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.  Further detail is set out in the RLDP Issues, Vision and Objectives Paper and Appendix 6 of the Deposit RLDP.	No change required.

## Strategic Policy S1 – Growth Strategy

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1061 / Bannau Brycheiniog National Park (BBNP) / Objection	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.	<p>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 Brecon Beacon 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.</p> <p>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.</p>	No change required.
1196 / Torfaen County Borough Council / Objection	The housing/employment growth supports and is focused on Monmouthshire's main sustainable settlements and whilst none are near the boundary with Torfaen, there is a need to understand the regional picture and context in relation to housing and employment growth -happy to discuss this in a 'Statement of Common Ground' in due course, if requested. Suggest matters for a 'Sub-Regional Statement of Common Ground' between the three LPAs of Newport, Monmouthshire, and Torfaen, and could include proposed housing and economic growth levels in the sub-region, Green Belt, and commuting patterns and transport.	Comments noted. The points raised will be addressed in Statements of Common Ground with the respective Local Planning Authorities (LPAs). The Council has worked in collaboration with neighbouring LPAs throughout the different stages of the RLDP preparation process, with details set out in Appendix 5 of the Deposit Plan.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1299 / Gloucestershire County Council / Comment	The impact of the RLDP allocations combined with development proposed in west Gloucestershire will need to be assessed in detail and in combination with necessary transport modelling at later stages of the plan process. This will need to take into account the proposed development proposals within the emerging Forest of Dean Local Plan.	<p>Comments noted. Monmouthshire County Council has and will continue to liaise with Gloucestershire County Council and the Forest of Dean District Council on cross border issues, including in relation to potential transport matters associated with proposed development proposals in emerging local plans, and improving public transport links between the counties.</p> <p>The RLDP transport policy framework reflects national policy which seeks to ensure that development is located and designed in accordance with the Sustainable Transport Hierarchy, with a focus on a reduction in the need to travel and a shift away from the private car for travel. Of note, Monmouthshire’s Local Transport Strategy (LTS) sets out MCC’s priorities for transport improvement to Chepstow and is reflected in RLDP Policy ST5 which supports and safeguards land for the identified schemes. The LTS includes active travel schemes and a Chepstow Transport Hub to improve both rail and bus linkages and frequency to and from the town with neighbouring settlements, including Severn Tunnel Junction (STJ) train station and Bristol, as well as road improvement to Highbeech roundabout and a potential new link road from the M48/B4245 to STJ train station.</p>	No change required.
1356 / Welsh Government / Support	The Draft Plan is in general conformity with Policies 1, 7, 33 and 36 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the South East region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire. The level of economic and housing growth proposed by the Deposit Plan supports the local need for additional economic and affordable housing growth. Welsh Government does not object to this level in principle.	Support for the proposed growth levels is welcomed.	No change required.
1356 / Welsh Government / Objection	The strategy places great emphasis on the need for a step change in the supply of affordable housing with all new housing sites being affordable housing led. For	The delivery of affordable homes is a key objective of the Plan, reflected in the 50% affordable housing policy requirement. However, the current reference to the ‘Sustainable and Resilient Communities Growth Strategy’ is considered to better reflect the Plan’s combined core issues of housing affordability, rebalancing our	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>reasons of consistency the Deposit plan should refer to the strategy as an affordable housing delivery led strategy.</p>	<p>demography, responding to the climate and nature emergency and enabling sustainable economic growth. Addressing these issues is considered to align with the principles set out in the Council’s Community and Corporate Plan of tackling inequality, protecting our environment and adapting to a world being reshaped by climate change. Overall, the ‘Sustainable and Resilient Communities Growth Strategy’ title is considered to be more consistent with the combination of key issues that the RLDP seeks to address.</p>	
<p>2031 / Peter Fox OBE MS Senedd Member for the Monmouth Constituency / Objection</p>	<p>Need new housing but this has to go hand in hand with sufficient employment opportunities and remain concerned that not enough has been done on this aspect of the RLDP.</p>	<p>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). Policy S2 provides details of the percentage of each by settlement.</p> <p>The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The approach taken is therefore considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The RLDP also sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	<p>No change required.</p>

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3465 / National Grid Electricity Distribution (NGED) (South West) / Comment	<p>NGED recommends that local planning authorities ensure they feed into the Distribution Futures Energy Scenario and that you contact them for confirmation of National Grids capacity to accommodate planned growth in their area. If capacity is limited should explore alternative locations for growth. NGED should be involved in the masterplanning of any development allocation which includes a large sub-station.</p>	<p>Comments noted. National Grid Energy Distribution (NGED) has been involved in the plan preparation and site selection process, with site specific considerations factored in as appropriate.</p> <p>The Council will continue to liaise with the NGED as the proposed sites progress to the planning application stage.</p>	No change required.
1677 / Councillor Frances Taylor / Objection	<p>To encourage the promotion of sustainable communities where residents can live and work in the same area, the RLDP proposes that housing growth will be accompanied by a commensurate amount of employment land. The previous LDP had the same policy and the employment land at Rockfield Farm (the strategic site in Magor with Undy) has still not been brought forward and is proposed to be rolled forward for office/light industry.</p>	<p>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). Policy S2 provides details of the percentage of each by settlement.</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The RLDP also sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>With regards to employment allocation EA1g – Rockfield Farm, Undy, the site has outline planning permission for employment use (reference DM/2016/00883). A reserved matters planning application for 5,575 sqm of B1 floorspace is also pending consideration (reference DM/2021/00358). It’s inclusion in the Plan is therefore considered appropriate.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	Infrastructure improvements required first prior to house building especially in the south of the county.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
1803 / Councillor Dr Louise Brown / Objection	Unlikely to achieve 50% affordable housing due to viability issues and even if it does so it means that developers will find that there is little or nothing left to contribute to much needed road and health infrastructure (i.e. Doctors and Dentists, local hospital facilities as Chepstow has no minor injuries unit).	<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>The mechanisms for improved health infrastructure sit outside of the planning process, however, the Council is fully engaged with the health board (ABUHB) to deliver health care service improvements across the County.</p>	No change required.
1803 / Councillor Dr Louise Brown / Objection	To have a development right next to the High Beech roundabout at Mounton Road is seen by local residents as “madness”. In view of the high congestion at this roundabout already development will block the free flow of traffic even more. This development of 146 houses, a hotel and	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>care home should be taken out of this RLDP and any other development in Chepstow as the roads cannot take any further house building. It would be possible to do so in view of the 15% margin in this RLDP which was previously only 10% in the current LDP.</p>	<p>infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>Further detailed comments on proposed site allocation Policy HA3 – Land at Mounon Road, Chepstow, including Highbeech roundabout considerations, are set out elsewhere in the report.</p>	
1803 / Councillor Dr Louise Brown / Objection	<p>In the last LDP only 3000 out of the 4500 were built, meaning on average 300 per year. The Build rate is very over-estimated, as is the likelihood of getting 50% affordable. housing.</p>	<p>The RLDP sets a housing requirement of 5,400 homes resulting in an average annual requirement of 343 homes per annum over a 15 years and 9 months period the plan covers (April 2018 – Dec 2033). This is considered achievable when compared to build rates over the first seven years of the Plan, which have ranged from 298 dwellings to 443 units and an average of 363 per annum. The RLDP is considered to have made provision for a sufficient range and choice of deliverable sites to deliver the remaining homes required to meet the 5,400-housing requirement.</p> <p>An updated housing trajectory to take account of the 2024/25 housing monitoring figures is contained in the submission evidence and demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
<p>2489 / Councillor Lisa Dymock / Objection</p>	<p>Object to growth strategy: Overly ambitious housing targets, mismatch between housing growth and infrastructure capacity, lack of economic growth to support population increase, environmental risks and unsustainable development, lack of flexibility and resilience, insufficient public engagement and transparency.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>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.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>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).</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The RLDP also sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>The RLDP has been the subject of a number of consultation and engagement exercises, covering all stages of the Plan process including the Issues, Vision and Objectives, Growth and Spatial Options, Preferred Strategy and most recently the Deposit Plan. Collectively, these have provided an open and transparent record of how the growth and spatial strategy contained in the Deposit Plan has been arrived at. With specific regard to the Deposit Plan, a six-week consultation period was undertaken, which included drop-in sessions across the County, on-line virtual sessions and website information. Full details are set out in the Consultation Report.</p>	

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2497 / Councillor Paul Pavia / Objection	<p>Within the context of the HA3 allocation, the development may create short-term construction jobs, but the long term economic benefits are uncertain. Likelihood that new residents will commute. The proposal could reinforce an 'out-commuter' culture rather than fostering a self-sustaining community with local employment opportunities.</p>	<p>A key consideration in allocating Land at Moun-ton Road, Chepstow (Policy HA3) is that as a mixed-use site it has associated job creation and tourism benefits.</p> <p>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). A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances.</p> <p>In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
2505 / Councillor Steven Garratt / Support	<p>Need to manage growth to ensure that local infrastructure requirements can be achieved such as access to active travel, local services in health and dentistry working with ABUHB and GPs/dentists. Also need to market the county as a destination for small start ups and medium businesses to reduce the outflow or workers to major urban centres.</p>	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth</p>	No change required.

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		<p>including small/medium businesses. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
<p>3118 / Councillor Meirion Howells / Comment</p>	<p>Support but growth must take into account development on BMV, flooding and appropriate infrastructure is provided.</p>	<p>A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV land will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	<p>No change required.</p>
<p>1056 / Abergavenny</p>	<p>With regards to Abergavenny, it is essential that the town can offer sites and premises for new and expanding businesses.</p>	<p>Abergavenny’s role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Town Council / Support		<p>Policy S2, reflecting the range of services, facilities and transport provision available in the settlement.</p> <p>The limited level of employment allocations made in Abergavenny is recognised; however, this reflects the limited number of candidate site submissions the Council received 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 in other foundational sectors, such as tourism, food and retail, which play an important role in the local economy.</p>	
1106 / Llanarth Fawr Community Council / Objection	<p>Object to the excessive level of housing growth and to the 15% flexibility allowance. Welsh Government letter of 27th August 2021 to MCC stated that the proposed level of housing growth should be no greater than 4,275 units plus a 10% flexibility allowance. The Preferred Strategy figure of 5,400 was acquiesced to by WG in a later letter of 26th January 2023 purely on the basis of need for affordable homes and concluded further technical work is required in terms of growth in jobs and homes. A lower target would reduce pressure on Minor Villages.</p>	<p>The growth level of 5,400 homes housing requirement strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>With respect to growth in the Minor Rural Settlements, the RLDP does not make any site-specific allocations in this tier of the settlement hierarchy.</p>	
<p>1138 / Raglan Community Council / Objection</p>	<p>The housing target of 5,400 - 6,210 homes over the plan period is excessive and is higher than the 4,275 homes target WG noted in its 2021 letter. A target of 4,275 homes would remove the need for new housing allocations in Raglan and other secondary settlements set out in the RLDP.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable</p>	<p>No change required.</p>

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		<p>housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p>	
<p>1138 / Raglan Community Council / Objection</p>	<p>15% flexibility allowance is unjustified and will lead to over-allocation of sites that could/would lead to developers cherry-picking. More sites will be developed than are justified by the already excessive housing targets, the most difficult to develop sites will be left to last, and the most marketable sites, in villages such as Raglan, will be developed first, adding pressure on Raglan infrastructure.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet</p>	<p>No change required.</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. Welsh Government, in response to the Deposit consultation, concluded the proposed level of growth is in general conformity with Future Wales and did not raise an objection to this level in principle.</p> <p>The growth levels proposed for the Secondary Settlements including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p>	
<p>1255 / Home Builders Federation (HBF) / Support</p>	<p>Supports the level of growth proposed by the policy and the 15% flexibility allowance, it is disappointing that the Level of growth has been reduced from the previous Draft in part as a result of intervention from The Welsh Government. The 15% Flexibility is considered appropriate and should not be reduced.</p>	<p>Support for the flexibility allowance is welcomed.</p> <p>The level of growth has been informed by a wide range of robust evidence and responds to a number of key challenges that have arisen during the plan preparation process. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded that the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	<p>No change required.</p>
<p>1255 / Home Builders</p>	<p>Challenges the statement in 6.3.2 that affordability is an issue for many private house purchasers.</p>	<p>Comments noted, however, the statement is considered valid. As noted in RLDP Issues, Vision and Objectives document (updated September 2024), average house prices in the County are high at £400,496 when compared to the Welsh average of</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Federation (HBF) / Objection		£238,871 (Hometrack, May 2024). They are also high in relation to earnings. This has contributed to a pressing need for additional affordable housing in the County and the issue forming one of the key objectives of the RLDP and being a core Council priority.	
1255 / Home Builders Federation (HBF) / Objection	Para 6.3.4 - HBF is concerned about the statement regarding a change in Welsh Government policy on the use of Social Housing Grant as developers have no control over if and when such a policy position would be changed by the Welsh Government. This uncertainty leads to concerns over deliverability and the soundness of the plan.	Viability assessments have been undertaken as part of the RLDP evidence base, which demonstrate that site allocations are viable based on key policy requirements without subsidy.	No change required.
1367 / Abergavenny and District Civic Society / Objection	Conditional support for S1: have doubts about the deliverability of the Plan's housing requirement by 2033 and would welcome a lower number, and despite previous opposition to the housing requirement of the Plan, now accept this, except the 15% flexibility allowance which seems unnecessarily high without further justification. Would object to any proposals that increase the housing requirement or any diversion of housing growth from elsewhere in the County to Abergavenny.	<p>Conditional support for S1 is welcomed. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>With regards to the flexibility allowance, the Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The Council has not proposed any amendments to the Spatial Strategy as result of the Deposit Plan consultation.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	
<p>1376 / Abergavenny Transition Town / Objection</p>	<p>Aware of objections to housing sites elsewhere in the county and would object to any proposals the significantly increase the housing requirement and also to any diversion of housing growth to Abergavenny from elsewhere in the county above what is proposed.</p>	<p>Comments noted. The Council has not proposed any amendments to the Spatial Strategy as result of the Deposit Plan consultation.</p>	<p>No change required.</p>
<p>1376 / Abergavenny Transition Town / Objection</p>	<p>The very precise employment numbers of 6,240 additional jobs over the plan period in relation to the number of new homes, even though they were the outcome originally of commissioned consultant's findings, are surely illusory in their precision. The employment figures fluctuate considerably over time, so to use one in an official deposit plan is surely not wise, it needs a range of figures recognising the uncertainty and lack of planning's ability to control matters.</p>	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes appropriate assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period, rather than a precise target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised that the jobs figure higher is than some past trends, it is within the range of past performance in the County.</p>	<p>No change required.</p>

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		<p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
<p>1984 / Raglan Village Action Group / Objection</p>	<p>Housing target is excessive. WG stated in letter of 27th August 2021 that housing growth should be no greater than 4,275 units. WG letter of 26th January 2023 only agrees to the requirement of 5,400 on the basis of need for affordable homes and concluded that further technical work is required to demonstrate the RLDP is sound. There is no evidence that 50% affordable housing is viable and no justification for the Deposit Plan exceeding WG housing target of 4,275 units, plus flexibility. There would be no justification for housing in Raglan if the 4,275 targets was adopted.</p>	<p>The growth level of 5,400 homes housing requirement strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p>	
1984 / Raglan Village Action Group / Objection	The 15% flexibility allowance is unjustified. Over-allocation of sites will result in developers cherry picking sites and sites in villages such as Raglan will be developed first.	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.	
2532 / Cwmpas Community Housing / Objection	Community led affordable housing has indirect relevance and contribution to the policy. Direct and overt reference to community led housing could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Monmouthshire.	Strategic Policy S1 – Growth Strategy, sets out the RLDP’s growth levels considered appropriate to address Monmouthshire’s core purpose of building sustainable and resilient communities for all. Reference to community led affordable housing is therefore not considered appropriate in this context.	No change required.
2548 / Shirenewton Community Council / Objection	Plan relies on population projections which may not transform into reality. Latest birth rate statistics show decline. This and external factors such as climate change, changing work patterns and morbidity rates suggest plan unlikely to deliver on expectations. Should lean towards low growth and be capable of rapid review and adjustment.	<p>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 Brecon Beacon National Park area within Monmouthshire, applying assumptions in relation to migration household membership rates and commuting ratio. 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.</p> <p>In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	No change required.
2548 / Shirenewton Community Council / Objection	Historic and ongoing failure of national government to build council housing and the infrastructure to support both it and market housebuilding dictates that the need for housing will continue to rise	Central government’s policy on building council houses is beyond the scope of the RLDP. However, the delivery of additional affordable homes in Monmouthshire is a key objective of the Plan, reflected in the 50% affordable housing policy requirement.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	irrespective of future variations in the population.		
2548 / Shirenewton Community Council / Objection	No solution of out commuting - makes the situation worse by supporting large scale developments at Caldicot, Portskewett and Chepstow. Fails to protect green belt north of the M4 despite Welsh Government Planning Policy.	<p>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).</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>It is expected that the trend for working for home and remote working will continue in the longer term as a legacy of the Covid-19 pandemic and in accordance with Welsh Government's ambition for 30% of the Welsh workforce working from or near home, making it less important where the jobs are located and therefore reducing commuting patterns as result of changing working habits.</p> <p>The South-East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration as a Green Belt, with the detailed boundary to be defined through the preparation of a Strategic Development Plan (SDP). While the County's main towns are situated outside of Future Wales' indicative green belt, in assessing candidate sites and their relationship to Policy 34 of Future Wales, consideration has been given to PPW, which states that when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South-East Wales Region.	
2548 / Shirenewton Community Council / Objection	Plan should halt housing developments until there is the infrastructure to support it. This includes additional access onto the M4/M48, Metro to Chepstow, electricity and sewerage system rebuilding and 5g broadband for all.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>The RLDP incorporates a range of policies to help improve the transportation system, including Policy ST5 – Transport Schemes, which supports and safeguards transport schemes identified in the Local Transport Strategy (LTS), including Chepstow active travel schemes and the Chepstow Transport Hub for rail and bus. Access arrangements onto the M4/M48 are beyond the scope of the RLDP and fall under the jurisdiction of Welsh Government as the Trunk Road Agency.</p>	No change required.
3630 / Shirenewton Community Council / Objection	Concerns that growth is unlikely to be delivered based on evidence provided.	The RLDP is considered to be supported by a robust, proportionate and credible evidence base that demonstrates deliverability. In addition, the Plan contains a monitoring framework which will be used to assess whether the Plan's strategy, policies and proposals are being delivered.	No change required.
3902 / Usk Civic Society / Objection	Objects to excessive level of housing prediction, 15% flexibility allowance, RLDP has not been correctly presented to Members as per DA (see soundness test 3), SA11 is not essential.	The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>'green' rating and noted that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared with regard to relevant legislation, national planning policy and regional/local strategies, and the Plan's strategy, policies and proposals</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>have been informed by a robust evidence base in the form of various background reports and supporting studies relating to key local issues for the Plan to address.</p> <p>The growth levels proposed for the Secondary Settlements, including Usk, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p>	
<p>3562 / Gateway to Wales Action Group / Objection</p>	<p>State the objective to create 6210 new homes is remarkably close to the objective to create 6240 jobs. Refer to the number of jobs lost in Monmouthshire and total growth of the workforce in Wales over the next 5 years. Suggest a job growth of 21% would be needed for the County for the period of 2023 - 2033 and state this is unrealistic. State the plan should be amended to show negligible jobs growth and reflect this in the number of houses to be built. State this would reduce the amount of out migration to work.</p>	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes appropriate assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period rather than a target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Jobs will be delivered through a range of sectors including B use class industries as well as foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire’s economy. This reflects the character of the wider economy of South-East Wales and should be supported in line with the ‘whole economy’ approach that is advocated by national planning policy.</p> <p>In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the county and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.	
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	<p>Concerned over the timeframe of the plan. Indeed, assuming that it is adopted during the course of 2026 there will be just 7 years left of the period. On the basis that the current RLDP will have taken around 8 years to complete, it would seem prudent to immediately start planning for the replacement plan, alternatively the period for this plan should be extended to 2038 with additional allocations identified otherwise there will be further policy voids (QI point 1.3).</p>	<p>Comments noted, however, the Local Development Plan (Wales) Regulations 2005 (as amended 2015), do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a Plan review to be considered as part of the annual monitoring requirements post adoption.</p>	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	<p>Concerned by the approach taken towards restricting growth, which does not reflect the evidence base which clearly points to a higher level of growth. To make the Plan sound, the level of growth should revert to the evidenced position of the 2021 Preferred Strategy. Provision should be made for a total of 9,126 homes to deliver a requirement of 7,605 homes (including a 20% flexibility allowance).</p> <p>Earlier versions of the Growth and Spatial Options Paper, conclude a higher growth rate is considered to be the best fit to address Monmouthshire’s issues.</p> <p>The Strategy is not based on the evidence and is therefore contrary to PPW and will not address the RLDP’s core issues.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered</p>	No change required.

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		<p>to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
<p>1301 / Melin Homes / Objection</p>	<p>Concerned by the approach taken to restricting growth which has been entirely shaped by Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. PPW12 is clear that housing requirements must be based on evidence. Fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own different, but equally challenging issues that need to be addressed.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	<p>No change required.</p>
<p>1301 / Melin Homes / Objection</p>	<p>Concerns over the reliance of completions (2,220) associated with the first 6 years of the Plan and existing commitments (798</p>	<p>The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	units) towards the housing requirement figure.	figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).	
1301 / Melin Homes / Objection	Windfalls: question the appropriateness of including an allowance for the last 4.75 years of the plan. Would expect pre-application enquiries to have been made on such sites by now. Sites in the UCS are constrained. 230 units is highly optimistic, and the number should be halved to 115 dwellings.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
1301 / Melin Homes / Objection	Flexibility Allowance should be increased to 20%. Previous LDP under delivered by 33% and therefore prudent to have a higher buffer. Given the highly limited timeframe of the Plan, a delay on a handful of sites could result in a significant number of dwellings being pushed outside the plan period.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.	
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Objection	Seems prudent to plan for a higher buffer particularly as any delays in sites due to matters such as phosphates could result in sites being pushed outside of the plan period. We note that 20% would be consistent with the approach at Bridgend (where there was a similar level of under delivery in the earlier LDP). Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	No change required.
1461 / MCC Estates / Comment	Acknowledge the reasons behind the level of growth in response to Welsh Government's position that Monmouthshire must accord with national growth objectives. However, disappointed that higher levels of growth found appropriate at earlier stages of the plan process are not able to be progressed.	The proposed RLDP growth level strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a	No change required.

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		<p>'green' rating and noted that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.</p>	
1467 / Hallam Land Ltd (Boyer Planning) / Support	Support S1 in principle, note the growth identified as a minimum is reflective of Monmouthshire's ambitions as an authority whilst remaining proportionate to the wider regional agenda.	Support welcomed.	No change required.
1480 / Edenstone Homes (Boyer Planning) / Support	In principle Edenstone Homes support MCC's growth aspirations, with HA5 playing a crucial role in delivering the requisite level of housing over the proposed plan period.	Support welcomed.	No change required.
1480 / Edenstone Homes (Boyer Planning) / Objection	While Edenstone support the growth level, it is important to recognise this figure is a considerable reduction from the 2021 PS. Approximately 65.8% of MCC's housing requirement is set to be accounted for by existing commitments. There is sufficient evidence to warrant achieving a 20% flexibility allowance and rolling the plan-period forward to 2021-2036.	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a Plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is</p>	No change required.

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		<p>considered to be justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p>	
<p>1493 / Vistry Homes Limited / Objection</p>	<p>Proposed level of growth represents a significant reduction from the evidence based level of growth identified at an earlier stage in the plan making process. FW does not set a housing requirement for Wales or the regions, nor does it specifically preclude the level of growth presented in the 2021 PS. No evidence has been presented to demonstrate that a higher growth level in Monmouthshire would undermine the National Growth Area.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the</p>	<p>No change required.</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
1493 / Vistry Homes Limited / Objection	Plan period overlaps with the Adopted LDP by 3 years. Deposit Plan relies on houses that have been delivered since 2018/19 as a significant component of its housing supply without acknowledging the historic shortfall against the housing requirement of the adopted LDP. To ensure housing completions are not being double counted, the plan period should begin no earlier than 2021. Shortfall of the LDP should be added to the RLDP requirement.	<p>The housing requirement figure is based on the Plan period 2018-2033 and therefore the housing supply components also have to take account of that period.</p> <p>The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p>	No change required.
1502 / Hallam Land Ltd (Asbri Planning) / Objection	Details not specified - refers to previous representations at earlier RLDP consultation stages.	For comments to be considered duly made representations they need to be provided during the Deposit consultation period. Responses to comments made in relation to the Preferred Strategy can be found in the Initial Consultation Report (2024).	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Note the flexibility allowance has increased from 10% to 15%, state this should be the absolute minimum the RLDP commits to deliver with a view to achieving and exceeding the minimum requirement which itself should be viewed as a floor to development rather than a ceiling.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p>	
<p>1519 / Barratt David Wilson Homes (Savills) / Objection</p>	<p>Growth Option 1 should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (Sept 2022). Recognised that WG raised a non-conformity objection to Growth Option 1, instead requiring Growth Option 2. It is unsound to select a growth option that performs less well in the analysis. Further comments are set out in Appendix 1 of the representation.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the</p>	<p>No change required.</p>

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		<p>main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
<p>1519 / Barratt David Wilson Homes (Savills) / Objection</p>	<p>Positive to see an increase in the flexibility allowance from 10% to 15%. However, continue to have concerns that this figure is inadequate based on the under delivery over the Adopted LDP plan period where the 2022 AMR recognised that only 66% of homes planned for had been delivered. DPM allows for a bespoke flexibility allowance where justified by evidence. A flexibility allowance of 20% is more appropriate.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	<p>No change required.</p>
<p>1519 / Barratt David Wilson</p>	<p>The amount of homes forecast to come forward through small sites and windfall</p>	<p>The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). For</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Homes (Savills) / Objection	sites will not be as great as forecast in the Housing Background Paper as the Urban Capacity Study is unrealistic.	<p>information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p> <p>The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.</p> <p>The small site infill allowance is based on past trends but has been discounted by 15% to take account of the plan-led system, phosphate related measures and limited brownfield opportunities in the County. Again, a conservative approach has therefore been taken to the infill allowance.</p>	
1519 / Barratt David Wilson Homes (Savills) / Objection	The assumptions made with regards to existing commitments is unrealistic and fails to make appropriate allowance for non-delivery.	<p>For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p> <p>The approach taken towards existing commitments is considered to be consistent with the approach set out in the Development Plans Manual and does factor in a non-delivery allowance, which can either be applied as a percentage across the overall landbank or sites can be discounted individually. Given the relatively small number of sites involved in Monmouthshire’s land bank the latter approach has been taken with seven sites discounted from the existing commitments figure. The remaining existing commitments are contained within the housing trajectory accompanying the Plan and were not disputed by the Housing Stakeholder Group.</p>	No change required.
1596 / Monmouthshire Housing Association (MHA) (Boyer Planning) / Support	In principle support for the growth strategy and consider the increase in the flexibility rate to 15% a positive step.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1663 / Richborough / Objection	Refer to Policy S1 and state it should be made clear that the 6,210 figure does not represent a maximum provision or cap on future development. Note elsewhere in the Plan it refers to approximately 6,210 homes reflecting this is not an absolute figure. Request the policy wording is amended to reflect this and changed to either approximately or at least 6,210 homes. Support the Council's assertion that the level of growth is in general conformity with Future Wales's overall strategy but consider a higher level of growth could be supported to best address the core issues and objectives identified in the Plan.	<p>The proposed growth figure strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>Inclusion of the term 'approximately' is not considered necessary within the context of Policy S1. The policy as currently worded reflects the housing requirement figure plus a 15% flexibility allowance.</p>	No change required.
1663 / Richborough / Comment	Support provision of affordable housing but state addressing housing affordability will require a number of policy levers to be applied throughout the Plan. This should include the delivery of a wide range and choice of housing types and sizes, of both market and affordable tenures. State the importance of providing new market housing, alongside affordable homes should not be overlooked in the Plan.	Comments noted. The RLDP contains a robust policy framework to ensure a sufficient supply of both market and affordable homes in a range of choice of housing types and sizes. The main policy objective of Policy H8 – Housing Mix, which seeks to ensure that development proposals of 10 or more homes, that include market homes, must include a range and mix of house types, tenures and size, is considered to address the points raised.	No change required.
1683 / Llanarth Estates / Objection	Concerned by the approach taken to restricting growth which has been entirely shaped by Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address	The RLDP growth level strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and	No change required.

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	<p>the issues identified. PPW12 is clear that housing requirements must be based on evidence. Fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own different, but equally challenging issues that need to be addressed.</p>	<p>Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
1683 / Llanarth Estates / Objection	<p>Concerns over the reliance of completions (2,220) associated with the first 6 years of the Plan and existing commitments (798 units) towards the housing requirement figure.</p>	<p>The approach taken to meeting the housing provision figure of 6,210 homes is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p>	No change required.
1683 / Llanarth Estates / Objection	<p>Windfalls: question the appropriateness of including an allowance for the last 4.75 years of the plan. Would expect pre-application enquiries to have been made on such sites by now. Sites in the UCS are constrained. 230 units is highly optimistic and the number should be halved to 115 dwellings.</p>	<p>For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.</p>	No change required.

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1683 / Llanarth Estates / Objection	Flexibility Allowance should be increased to 20%. Previous LDP under delivered by 33% and therefore prudent to have a higher buffer. Given the highly limited timeframe of the Plan, a delay on a handful of sites could result in a significant number of dwellings being pushed outside the plan period.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	No change required.
1692 / Edenstone Homes (Highlight Planning) / Objection	Not enough time left on the Plan to deliver the sites - suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement.	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	No change required.
1692 / Edenstone Homes (Highlight	Question whether the evidence base (ageing population, economic opportunity and affordability issues) support the	The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Planning) / Objection	reduced level of growth compared with the Summer 2021 Preferred Strategy.	<p>objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
1692 / Edenstone Homes (Highlight Planning) / Objection	Consider that a flexibility allowance of 20% would provide greater contingency to allow for unforeseen circumstances.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>In addition, the RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	
<p>1694 / The Stantonbury Building and Development Company / Objection</p>	<p>Housing requirement is significantly reduced from that proposed in the previous Preferred Strategy in July 2021 (7,605 homes). This is principally as a result of WG's objection on non-conformity grounds. An alternative approach to WG's low growth policy position is required. Higher growth options should be considered based on the published evidence and significant issues facing the County.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	<p>No change required.</p>

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1736 / Bellway Homes / Objection	Object to the considerable reduction from the previous 2021 Preferred Strategy. Consider it necessary for the plan period, currently at 2018-2033 to be rolled forward to 2021-2036. To ensure the consistent delivery of dwellings, additional sites should be allocated to provide a contingency.	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p>	No change required.
1736 / Bellway Homes / Objection	The flexibility allowance should be increased to 20% to facilitate additional allocations.	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	
<p>1948 / Edward Rogers / Objection</p>	<p>Plan underprovides older person housing. Rural settlements such as Trellech have higher proportion of older population and by not identifying additional sites the Plan undermines the needs of Older People.</p>	<p>With regards to the provision of homes for older people, Policy H7 – Specialist Housing, provides the policy framework to consider such proposals. Paragraph 12.91. provides details of the types of speciality housing Policy H7 refers to, including age-restricted general market housing, generally aimed at those over 55 as well as other types such as sheltered housing and residential care/nursing homes.</p> <p>With regards to the under provision of sites in Trellech, the RLDP’s spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. In addition, other factors such as infrastructure provision have been considered and in the case of Trellech, there is no capacity at the Trellech WWTW to accommodate foul flows from additional development. There are therefore less constrained sites within the Main Rural Settlements to accommodate the level of growth considered appropriate for that tier of the settlement hierarchy.</p>	<p>No change required.</p>

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1948 / Edward Rogers / Objection	Monmouthshire being a border county to England must seek to respond not only to the housing crisis within the LPA but also within England given the recent announcement to pursue housing growth in England.	<p>Comments noted. Monmouthshire County Council has and will continue to liaise with neighbouring local authorities on cross border issues, including in relation to proposed levels of growth in emerging local development plans.</p> <p>Discussions have taken place with neighbouring English authorities as part of the Duty to Cooperate process in England with regard to the potential for Monmouthshire to accommodate additional growth from these authorities. As part of this process, MCC advised that Monmouthshire is unable to accommodate unmet housing need for neighbouring authorities. This is because the RLDP’s growth strategy seeks to strike a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. The level of growth proposed in the Deposit Plan has been deemed to be in conformity with Future Wales by Welsh Government and is, therefore, considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	No change required.
1965 / Monmouthshire Housing Association (MHA) (GJPlanning) / Support	In principle, MHA support the Plan's Growth Strategy.	Support welcomed.	No change required.
2280 / Candleston Homes (Savills) / Objection	Growth Option 1 should be used for the RLDP by virtue of its stronger performance than the other two options. Recognised that WG raised a non-conformity objection to Growth Option 1, requiring the selection of Growth Option 2, however, Candleston Homes position continues to be that it is sound to select a growth option that	The RLDP growth level strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>performs less well in the analysis contained within the Growth and Spatial Options Paper September 2022.</p>	<p>consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
<p>2280 / Candleston Homes (Savills) / Objection</p>	<p>Positive to see the flexibility allowance increase from 10% at Preferred Strategy stage to 15% at Deposit. However, continue to have concerns that this is inadequate based on under delivery over the Adopted LDP plan where the 2022 AMR recognised that only 66% of homes planned for had been delivered. DPM allows for a bespoke flexibility allowance if properly evidenced. This shortfall provides the justification for a higher flexibility allowance.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.	
2280 / Candleston Homes (Savills) / Objection	Table 2: no allowance is made for either the non-delivery or reduced capacity of both the existing commitments and rollover allocations. In calculating windfall allowances, no discount is applied to other tiers of the settlement hierarchy as it follows, equally, that the delivery of windfall sites in these settlements has also become more challenging over time. No allowance is made for demolition of existing properties required to facilitate the delivery of windfalls.	<p>For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p> <p>The approach taken towards existing commitments is considered to be consistent with the approach set out in the Development Plans Manual and does factor in a non-delivery allowance, which can either be applied as a percentage across the overall landbank, or sites can be discounted individually. Given the relatively small number of sites involved in Monmouthshire’s land bank the latter approach has been taken with seven sites discounted from the existing commitments figure. The remaining existing commitments are contained within the housing trajectory accompanying the Plan and were not disputed by the Housing Stakeholder Group.</p> <p>The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.</p> <p>The small site infill allowance is based on past trends but has been discounted by 15% across all settlements to take account of the plan-led system, phosphate related measures and limited brownfield opportunities in the County. Again, a conservative approach has therefore been taken to the infill allowance.</p> <p>It is standard practice to only count the net gain in the number of homes when undertaking housing monitoring. Demolitions are therefore factored into the figures, both in terms of completions and trends.</p>	No change required.
2394 / Taylor Wimpey (Savills) / Objection	Growth Option 1 should be used for the RLDP by virtue of its stronger performance than the other two growth options presented in the Growth and Spatial Options Paper (Sept 2022). Recognised that	The Deposit Plan’s growth level strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>WG raised a non-conformity objection to Growth Option 1, instead requiring Growth Option 2. It is unsound to select a growth option that performs less well in the analysis. Further comments are set out in accompanying written statement.</p>	<p>including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales. It also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	
<p>2394 / Taylor Wimpey (Savills) / Objection</p>	<p>Positive to see an increase in the flexibility allowance from 10% to 15%. However, continue to have concerns that this figure is inadequate based on the under delivery over the Adopted LDP plan period where the 2022 AMR recognised that only 66% of homes planned for had been delivered. DPM allows for a bespoke flexibility allowance where justified by evidence. A flexibility allowance of 20% is more appropriate. Further comments are set out in accompanying written statement.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	
<p>2394 / Taylor Wimpey (Savills) / Objection</p>	<p>Apart from the flexibility allowance applied on the housing requirement, no specific allowance is made for either the non-delivery or reduced capacity of both the existing commitments and rollover allocations; In calculating the windfall allowances, no discount is applied to other tiers of the settlement hierarchy as it follows, equally, that the delivery of windfall sites in these settlements has also become more challenging over time; No allowance is made for demolition of existing properties required to facilitate the delivery of windfalls.</p>	<p>For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p> <p>The approach taken towards existing commitments is considered to be consistent with the approach set out in the Development Plans Manual and does factor in a non-delivery allowance, which can either be applied as a percentage across the overall landbank, or sites can be discounted individually. Given the relatively small number of sites involved in Monmouthshire’s land bank the latter approach has been taken with seven sites discounted from the existing commitments figure. The remaining existing commitments are contained within the housing trajectory accompanying the Plan and were not disputed by the Housing Stakeholder Group.</p> <p>The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.</p> <p>The small site infill allowance is based on past trends but has been discounted by 15% across all settlements to take account of the plan-led system, phosphate related measures and limited brownfield opportunities in the County. Again, a conservative approach has therefore been taken to the infill allowance.</p> <p>It is standard practice to only count the net gain in the number of homes when undertaking housing monitoring. Demolitions are therefore factored into the figures, both in terms of completions and trends.</p>	<p>No change required.</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2416 / Edenstone Homes / Objection	Not enough time left on the Plan to deliver the sites - suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP's housing requirement.	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	No change required.
2416 / Edenstone Homes / Objection	Question whether the evidence base (ageing population, economic opportunity and affordability issues) support the reduced level of growth compared with the Summer 2021 Preferred Strategy.	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	No change required.
2416 / Edenstone Homes / Objection	Consider that a flexibility allowance of 20% would provide greater contingency to allow for unforeseen circumstances	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	
<p>2419 / Edenstone Homes / Objection</p>	<p>Not enough time left on the Plan to deliver the sites - suggest that the plan period be extended to cover an increased timescale beyond 2033 with associated amendments to the RLDP’s housing requirement.</p>	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	<p>No change required.</p>
<p>2419 / Edenstone Homes / Objection</p>	<p>Question whether the evidence base (ageing population, economic opportunity and affordability issues) support the reduced level of growth compared with the Summer 2021 Preferred Strategy.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.	
2419 / Edenstone Homes / Objection	Consider that a flexibility allowance of 20% would provide greater contingency to allow for unforeseen circumstances	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	No change required.
2463 / Barwood Development Securities Ltd / Support	Support the level of growth set out in S1.	Support welcomed.	No change required.
2463 / Barwood Development Securities Ltd / Support	Whilst paragraph 6.3.4 recognises the ambitious RLDP policy requirements, an element of flexibility should be built into these policy requirements to take into account of potential change in	Whilst the Council will continue to work with the relevant organisations and Welsh Government on its policy position regarding Social Housing Grant and other public sector funding sources to increase flexibility in the system, viability assessments have been undertaken as part of the RLDP evidence base, which demonstrate that site allocations are viable based on policy requirements.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>circumstances. Sites which can currently demonstrate viability could be less viable as economic circumstances/UK politics/policies change. Public subsidy cannot Solely be relied upon.</p>		
<p>2951 / Tirion Homes / Objection</p>	<p>Concerned by the approach taken to restricting growth which has been entirely shaped by Welsh Government's policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. PPW12 is clear that housing requirements must be based on evidence. Fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own different, but equally challenging issues that need to be addressed.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a 'green' rating and noted that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.</p> <p>The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2951 / Tirion Homes / Objection	Concerns over the reliance of completions (2,220) associated with the first 6 years of the Plan and existing commitments (798 units) towards the housing requirement figure.	The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).	No change required.
2951 / Tirion Homes / Objection	Windfalls: question the appropriateness of including an allowance for the last 4.75 years of the plan. Would expect pre-application enquiries to have been made on such sites by now. Sites in the UCS are constrained. 230 units is highly optimistic and the number should be halved to 115 dwellings.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
2951 / Tirion Homes / Objection	Flexibility Allowance should be increased to 20%. Previous LDP under delivered by 33% and therefore prudent to have a higher buffer. Given the highly limited timeframe of the Plan, a delay on a handful of sites could result in a significant number of dwellings being pushed outside the plan period.	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	
<p>2952 / Candleston Homes / Objection</p>	<p>Concerned by the approach taken to restricting growth which has been entirely shaped by Welsh Government’s policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. PPW12 is clear that housing requirements must be based on evidence. Fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own different, but equally challenging issues that need to be addressed.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2952 / Candleston Homes / Objection	Concerns over the reliance of completions (2,220) associated with the first 6 years of the Plan and existing commitments (798 units) towards the housing requirement figure.	The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).	No change required.
2952 / Candleston Homes / Objection	Windfalls: question the appropriateness of including an allowance for the last 4.75 years of the plan. Would expect pre-application enquiries to have been made on such sites by now. Sites in the UCS are constrained. 230 units is highly optimistic and the number should be halved to 115 dwellings.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
2952 / Candleston Homes / Objection	Flexibility Allowance should be increased to 20%. Previous LDP under delivered by 33% and therefore prudent to have a higher buffer. Given the highly limited timeframe of the Plan, a delay on a handful of sites could result in a significant number of dwellings being pushed outside the plan period.	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	
<p>2954 / Sero / Objection</p>	<p>Concerned by the approach taken to restricting growth which has been entirely shaped by Welsh Government’s policy position that requires a low growth approach rather than an approach that is capable of providing the more positive planning intervention required to address the issues identified. PPW12 is clear that housing requirements must be based on evidence. Fundamentally wrong to ignore the pressing needs in Monmouthshire and focus wholly on investment in the valleys when Monmouthshire has its own different, but equally challenging issues that need to be addressed.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p>	<p>No change required.</p>



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2954 / Sero / Objection	Concerns over the reliance of completions (2,220) associated with the first 6 years of the Plan and existing commitments (798 units) towards the housing requirement figure.	The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).	No change required.
2954 / Sero / Objection	Windfalls: question the appropriateness of including an allowance for the last 4.75 years of the plan. Would expect pre-application enquiries to have been made on such sites by now. Sites in the UCS are constrained. 230 units is highly optimistic and the number should be halved to 115 dwellings.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan period and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
2954 / Sero / Objection	Flexibility Allowance should be increased to 20%. Previous LDP under delivered by 33% and therefore prudent to have a higher buffer. Given the highly limited timeframe of the Plan, a delay on a handful of sites could result in a significant number of dwellings being pushed outside the plan period.	The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP has been prepared in accordance with Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. The flexibility rate is therefore considered to be appropriate.</p>	
<p>1366 / Carney Sweeney Ltd / Support</p>	<p>Support is provided to the level of growth as set out in Policy S1 which outlines that the Plan will make provision for the delivery of 6,210 homes (including a flexibility allowance of 15% to meet a housing requirement of 5,400 homes over the Plan period.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
<p>1383 / Taylor Wimpey (Boyer Planning) / Objection</p>	<p>Taylor Wimpey considers it necessary for the plan period to be rolled forward to 2021 - 2036 to allow for delays to date and also a 20% flexibility allowance to provide a contingency should some allocated sites fail to be delivered at the rate set out within the housing trajectory. Note this will ensure the consistent delivery of homes throughout the Plan period. As a consequence, the need for a higher provision of housing and additional allocations should be considered.</p>	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	
1739 / Save Our Unique Landscape (SOUL) / Support	We support the proposal for provision of 6,210 extra homes including 2000 affordable, of which 600 are planned for Abergavenny. However, if there is to be any countywide adjustment in these figures, we would recommend a reduction in the Abergavenny proposal with a corresponding increase in the Plan for Monmouth.	Support for the growth strategy is welcomed. The Council has not proposed any amendments to the Spatial Strategy as result of the Deposit Plan consultation.	No change required.
1739 / Save Our Unique Landscape (SOUL) / Objection	As regards countywide employment growth of 6,210 new jobs, this is bravely ambitious but unrealistic and the proposal for new jobs in Abergavenny is unacceptable. The town has 10.5% of housing growth compared with 4% new jobs and will lead to commuting.	<p>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). Policy S2 provides details of the percentage of each by settlement.</p> <p>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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Abergavenny, including in foundational sectors, such as tourism, food and retail, which play an important role in the local economy.</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The RLDP also sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
<p>1739 / Save Our Unique Landscape (SOUL) / Objection</p>	<p>As a result of Covid the LDP has taken two years more than planned, but timescales for implementation have not changed. MCC may wish to request a nominal extension on to the Plan period.</p>	<p>The Local Development Plan (Wales) Regulations 2005 (as amended 2015) do not allow for a time extension to the plan period as suggested. The RLDP is considered to provide a sound policy framework to guide development in the County until 2033, with the commencement of a plan review to be considered as part of the annual monitoring requirements post adoption.</p>	<p>No change required.</p>
<p>1029 / Ann Langford / Objection</p>	<p>Cannot find reference to actual number of houses required. Growth planned in RLDP is out of line with growth needed in Monmouthshire and the Welsh Government principal projection for the whole county.</p>	<p>Policy S1 – Growth Strategy, sets out Monmouthshire’s housing requirement is 5,400 homes, but makes provision for 6,210 homes to allow for a 15% flexibility allowance. The Growth Strategy has been informed by a wide range of robust evidence and responds to a number of key challenges that have arisen during the plan preparation process.</p> <p>The proposed level of growth addresses our local evidence-based issues and objectives including in relation to the delivery of affordable homes, sustainable economic growth, and rebalancing our demography ensuring that young people can choose to live in the County, while responding to the climate and nature emergency. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>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. Whilst recognising that the growth level is above the</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Welsh Government 2018-based principal household projection, Welsh Government in its response noted that the level of growth proposed in the Deposit Plan is justified by the need to significantly increase the supply of affordable housing whilst not diverting growth away from the national growth area or have adverse effects on phosphate pollution.</p>	
<p>1284 / Mr G Alan Horne / Objection</p>	<p>Development must only be allowed if it meets all Objectives and eases current issues concerning pollution, congestion and services. An increase in housing and employment should go hand in hand with improvements to roads and services to reduce congestion and meet increased demand.</p>	<p>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. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1342 / Mr Howard Easton / Objection	No evidence in the RLDP of an ability to generate jobs in Usk for the new Usk residents.	It is recognised that there are no new employment allocations within Usk, however, Policy EA2 of the Replacement Local Development Plan (RLDP) protects an existing industrial estate at Woodside Industrial Estate for continued employment use. The Plan’s policy framework also supports/enables proposals for sustainable economic growth in Usk, including in other foundational sectors, such as tourism, food and retail, which play an important role in the local economy.	No change required.
1410 / Mr Kevin Hall / Objection	Insufficient infrastructure to support this level of growth.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
1646 / Mr Brian Williams / Objection	<p>Paragraph 6.3 – support provision of more affordable housing if it can be kept affordable. Insufficient detail on how new housing will be kept affordable in medium-long term given that high proportion of it (50%+) will be built in the part of the county where house prices already increasing most quickly as well as being in the commuter belt.</p> <p>Paragraph 6.3.11 – There is said to be an identified need at most for 46-60 ha of business land to 2040 (not 2033). Already 40ha land banked, but an additional 38 ha proposed to 2033? Even with a doubling of current uptake rate this is enough for 20 years - this is excessive, and new sites should be reduced.</p>	<p>Support for the Council’s affordable housing policy is welcomed. Paragraph 13.1.8 of the Replacement Local Development Plan provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity through the management by a Registered Social Landlord.</p> <p>Reference to an employment land requirement of between 46ha and 60ha for the period 2018 – 2040 is within the context of the Larger Than Local Employment Land Review, which looks at employment land needs on a South-East Wales basis, with the timescale reflecting the plan periods involved across the South-East Wales region.</p> <p>Reference to 40ha of employment land remaining in paragraph 2.1.18 is referring to the employment land remaining on Adopted Local Development Plan allocations. A review of these sites has been undertaken as part of the evidence base and is set out in the Employment Land Review (Nov 2022). Not all Adopted Local Development Plan employment allocations have been carried forward into the Replacement Local Development Plan (LDP), and do not therefore contribute to the provision figure set out in policy S10. However, some Adopted LDP employment sites have been rolled over and are factored into the provision figure of 57ha.</p> <p>Details of how the 57ha provision figures has been arrived at are set out in paragraph 16.3.1. of the RLDP. Approximately 9ha is from employment land that has already been delivered in the Plan period to date (2018-2025) and a further</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		48ha is from allocations, some of which are included in the 40ha referenced in paragraph 2.1.18.	
1779 / Mrs Sandra Lloyd / Objection	Objects as states plan looks to serve Bristol and Cardiff overspill rather than Monmouthshire itself and requests a possible residency requirement for affordable housing and a quota for providing suitable homes for over 55s through provision of single level dwellings that will allow elderly residents to stay healthy and independent as there is a shortage currently. Provision of retirement villages with on-site community facilities are necessary also and will ease burden on NHS, free up existing housing for younger people.	<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework. Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area.</p> <p>With regards to the provision of homes for over 55s, Policy H7 – Specialist Housing, provides the policy framework to consider such proposals. Paragraph 12.91. provides details of the types of speciality housing Policy H7 refers to, including age-restricted general market housing, generally aimed at those over 55 as well as other types such as sheltered housing and residential care/nursing homes.</p>	No change required.
1817 / Mrs Amie Symes / Objection	Concerns plan does not consider growth strategies including the regeneration of empty, derelict and abandoned properties before the expansion of settlement areas which would have a reduced climate impact.	<p>The housing supply components that contribute to meeting the housing provision figure include an allowance for both infill (sites smaller than 10 units) and windfall (sites of 10 units or more) sites. Combined this accounts for 758 homes towards the housing provision figure and therefore reduces the number of allocations required and avoids the over provision of housing allocations. The windfall figure has been informed by a Housing Potential Study (HPS), which sets out where windfall opportunities could potentially come from within the County. This demonstrates that windfall opportunities are limited in the County.</p> <p>More generally, there are limited opportunities within Monmouthshire for brownfield development and therefore allocations on greenfield sites are necessary to meet the objectives of the Plan. 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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>our demography and economic prosperity, which is reflected in the policy framework.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	
1939 / Mr Matthew Hayes / Objection	I am concerned about the authenticity of the departments numbers/data after previous misrepresentations to try to justify similar developments. There is a loss of trust after the department had to formally apologise for previous misrepresentations.	The RLDP is considered to be based on a robust evidence base, which will be subject to scrutiny at an Examination in Public.	No change required.
1944 / John Burrows / Objection	The total of 550 additional houses for Rural Areas is unrealistic and should be replaced with a much lower figure - and the balance, if still needed, should be added to the main development areas where there are facilities and services for larger scale development.	For information the housing data behind the RLDP has been updated to account for the 2024/25 monitoring period and the total housing provision for the rural settlements is now 561 homes, with full details set out in the Housing Background Paper (2025). Completions between 2018-2025 account for 221 of the 561 and a further 14 homes are anticipated on sites already with planning permission. A further 203 are estimated to be delivered through small infill developments such as barn conversions. Consistent with the advice set out in the Development Plans Manual (2020), this is based on past trends, reduced by 15% to reflect the plan-led system and reduced opportunities. Allocations in the rural settlements account for 123 homes, which are considered to be deliverable in the Plan period. The figure is therefore considered to be realistic and deliverable.	No change required.
1978 / Mr Stan Pochron / Support	Support noted for the growth strategy to encourage the development of realistic jobs to the area and to match them with affordable housing, to encourage young people into the curtilage of the Town (Abergavenny).	Support welcomed.	No change required.



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2114 / Mr Martin Andrews / Objection	The Plan should only make provision for 5,400 homes.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p>	No change required.
2299 / Mr Maurice Barnes / Objection	Would like to see a bigger development site in East Abergavenny so more employment opportunities, a few more homes and allotment provision can be made. A bigger site should allow for more good quality infrastructure development.	<p>The Deposit Plan notes at paragraph 14.3.1 that the allocation represents the intended future direction of development in the Abergavenny area with the longer-term intention for further growth beyond the Plan period. The current proposal is considered to offer a well-balanced mix of uses including new open market and affordable homes and a ‘community hub’ incorporating employment, neighbourhood uses and potential park and ride for Abergavenny Station. Policy HA1 – Land to the East of Abergavenny, also includes the provision of allotments/community food growing spaces.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2317 / Mr Philip Tate / Objection	Not convinced the homes are required within the County. New development at the Brunel Quarter targeted Bristol residents as relocation.	The growth level proposed in the Deposit Plan is necessary to address Monmouthshire’s key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing out demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.	No change required.
2324 / Mrs Susan Sandford / Objection	<p>Growth strategy is not sustainable as far as Chepstow concerned. Further, it is not compatible with ‘Future Wales’.</p> <p>Concerns noted over housing affordability need - reference to Fairfield Mabey only 26 out of 345 houses affordable. Rebalancing demography - Chepstow has a higher than average proportion of population in both the working age and younger age groups. Any new development in Chepstow incompatible with the Climate and Nature Emergency. Why is economy prosperity being considered? It could be argued that development will have a negative effect on the economy as a result of more traffic and air pollution which will impact on tourism and further 'death knell' for Chepstow's town centre.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>The growth levels proposed for the primary settlements, including Chepstow, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.</p> <p>The affordable housing provision for the Fairfield Mabey site was considered against the policy framework of the Adopted Local Development Plan, as well as abnormal development costs, given its brownfield credentials. A further 46 affordable homes have recently been approved on the site.</p> <p>Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect,</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	
2324 / Mrs Susan Sandford / Objection	Always been the case that Monmouthshire is a commuter county for Bristol, Newport, Cardiff etc. Working from home has had little effect on traffic volumes.	<p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>It is expected that the trend for working for home and remote working will continue in the longer term as a legacy of the Covid-19 pandemic and in accordance with Welsh Government’s ambition for 30% of the Welsh workforce working from or near home, making it less important where the jobs are located and therefore reducing commuting patterns as result of changing working habits.</p>	No change required.
2595 / Mrs Elda Fouch / Objection	Objection to sites in a location with 3 new housing developments with poor road access and no new infrastructure. Consider other sites with better infrastructure and accessible public transport, less risk of	The RLDP’s spatial strategy has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The appraisal confirms the dominant role of the primary	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	flooding, less risk of increasing already high levels of pollution and poor air quality.	settlements of Abergavenny, Chepstow, Caldicot (including the Severnside area) and Monmouth.	
2629 / Mr Richard Taylor / Objection	Impractical until there are definite and committed improvements to facilities and infrastructure first.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
2633 / Mr Martyn Reed / Objection	LDP mentions providing land allocation for business, yet Castle Business Parc is not fully utilised or maintained as it should be to promote businesses to use it.	<p>The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The approach taken is therefore considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan’s policy framework. The RLDP also sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth and maximising existing businesses such as Castle Business Parc. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
2684 / Dr Hopkins / Objection	Chepstow already has substantial housebuilding in recent years.	The growth levels proposed for the primary settlements, including Chepstow, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.	
2706 / Miss Anna Chapman / Objection	These plans will not bring growth to Chepstow. They will cost too much, and we don't have the infrastructure to support any of these changes. Brings pressure onto residents already living here. I think jobs are going to be more difficult to get and even taken away with these developments. Sees this as a dangerous plan.	<p>The growth levels proposed for the primary settlements, including Chepstow, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>Supporting and enabling sustainable economic growth is a core Council policy objective and is appropriately reflected in the Plan's policy framework. The RLDP also sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth and maximising existing businesses. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
2739 / Janine Amos / Objection	Objector feels some of the assumptions are out of date and don't take into consideration the social needs of new people in a community. Wants clarification on how affordable homes will be allocated and also on possible requirement for public	In accordance with national planning policy, the 2020 Mid-Year Estimates (published in June 2021) form the starting point for the modelling behind the RLDP's growth strategy. 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 Brecon Beacon National Park area within Monmouthshire, applying assumptions in relation to migration household membership rates and commuting ratio. The resultant growth level is considered to be a sustainable level	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	subsidy (para 6.3.4). Para 6.3.7 needs to be supported with current data.	<p>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. Full details of the modelling data can be found in the Monmouthshire RLDP Updated Demographic Evidence Report produced by Edge Analytics (Nov 2022).</p> <p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP’s vision, objectives and policy framework. Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area.</p> <p>With regards to paragraph 6.3.4, the Council will continue to work with the relevant organisations and Welsh Government on its policy position regarding Social Housing Grant and other public sector funding sources to increase flexibility in the system, however, viability assessments have been undertaken as part of the RLDP evidence base, which demonstrate that site allocations are viable based on policy requirements.</p>	
2769 / Dr Peter Thompson / Objection	The infrastructure and services at present are unable to support the present population so a higher number will only exacerbate the problem.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
2779 / Mrs Kaely Backland / Objection	Objects to policy S1 stating that housing target is excessive, failing to accord with Future Wales and quoting Welsh Government letter to the LPA where a limit of 4,275 was noted. Acknowledged figure was acquiesced in 2023 but notes a lack of evidence that the 50% affordable housing would be delivered. Believes that the 4,275 figure would reduce pressure on minor villages. Notes Delivery Agreement was not	The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>complied with as endorsement of preferred strategy and housing target was not agreed prior to RLDP being prepared.</p>	<p>‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>With respect to growth in the Minor Rural Settlements, the RLDP does not make any site-specific allocations in this tier of the settlement hierarchy.</p> <p>The RLDP has been prepared with regard to relevant legislation, national planning policy and regional/local strategies, and the Plan’s strategy, policies and proposals have been informed by a robust evidence base in the form of various background reports and supporting studies relating to key local issues for the Plan to address.</p>	

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2885 / Mr Jeffrey Parfitt / Objection	Driven by political dogma. Monmouthshire is a rural community and the subsequent irreversible destruction of green field site is not justifiable. 6.2.2 - the elderly demographic fits the natural disposition of the county. This policy is not 'age friendly'. 6.2.3 - 'not within the national growth area'. 6.3 - responding to nature/climate emergency - the Usk site is home to numerous protected species and its destruction will qualify as a criminal act.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	No change required.
3016 / Mr Matthew Brown / Objection	Not clear on how level of growth required has been determined and would like clarification on this.	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 Brecon Beacon National Park area within Monmouthshire, applying assumptions in relation to migration household membership rates and commuting ratio. 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. Full details of the modelling data can be found in the Monmouthshire RLDP Updated Demographic Evidence Report produced by Edge Analytics (Nov 2022).	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		The Growth and Spatial Options Paper (September 2022) also provides background information on how the growth option has been arrived at.	
3076 / Mr Dominic Lea / Objection	With 100s of thousands of empty homes in the UK (not including second homes), the perception for constant need to build new homes is non-sensical and will lead to unnecessary irreversible environmental damage. Green party manifesto proposed reduction in new homes with a focus on improving those we already have.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle.</p> <p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	No change required.
3278 / Miss Susan Griffiths / Objection	Should not happen at all	The preparation of a Local Development Plan is a statutory requirement of the Council. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.
3319 / Nr A Andrew Hubert	Realistic appraisal of the fact that existing statistics and models have been	Planning Policy Wales (PPW) includes economic, social, environmental and cultural well-being factors within the definition of sustainable development. In this respect,	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
von Staufer / Objection	superseded by the local impact of climate change.	<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth. Strategic Policy S4 – Climate Change, seeks to ensure that all proposals address the causes of, and adapt to the impacts of, climate change.</p>	
3320 / Mr Aaron O’Shea / Objection	Infrastructure first. Without infrastructure, all growth is pointless and counterproductive.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3336 / Mrs Carolyn Chapman / Objection	Mounton Road, Chepstow – in their desire to fulfil house building obligations, MCC appear to have failed to recognise the very serious health risks this Chepstow location would pose to inhabitants of the proposed new development. With its proximity to a heavily congested area and accompanying carbon emissions, particular consideration should be applied to the vulnerable and those with existing heart/lung conditions. Additional traffic this development would create, would also seriously impede the journey time for emergency vehicles.	<p>Chepstow’s role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence base.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding High Beech, any development affecting this junction must mitigate its traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>Site specific requirements relating to the allocation at Mounon Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounon Road, Chepstow.</p>	
3339 / Mrs Charlotte James / Objection	Why is so much growth required when the birth rate is lower than the death rate. This needs to be revisited.	<p>In accordance with national planning policy, the 2020 Mid-Year Estimates (published in June 2021) form the starting point for the modelling behind the RLDP’s growth strategy. 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 Brecon Beacon National Park area within Monmouthshire, applying assumptions in relation to migration household membership rates and commuting ratio. 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. Full details of the modelling data can be found in the Monmouthshire RLDP Updated Demographic Evidence Report produced by Edge Analytics (Nov 2022).</p>	No change required.
3340 / Mrs Cheryl Cummings / Objection	The level of job growth is unrealistic / 23% is not achievable only at best 4%.	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes appropriate assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period, rather than a precise target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised that the jobs figure is higher than some past trends, it is within the range of past performance in the County.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.	
3355 / Miss Clare Nurden / Objection	The plan needs to be completely changed.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.
3359 / Mr Dai Burgum / Support	New housing should be 10,000+ minimum, owned and rented out by the council not housing associations.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>Supporting paragraph 13.1.8 to Strategic Policy S7, provides detail of how affordable housing will be managed noting that the Council requires affordable</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>housing to be managed by a Registered Social Landlord approved for development, or by the Local Authority</p> <p>to ensure that dwellings remain affordable in perpetuity. The management of affordable housing by Registered Social Landlords (Housing Associations) is standard practice, supported by Welsh Government.</p>	
3362 / Mr David Charles / Objection	Council plans to build houses on flood plains and low-lying areas in Monmouth is insane. Climate change is real - flooding is only going to get worse. Promote tourism, which has been ignored over the last decades. Invest in the local shops and businesses, free parking encourages markets.	<p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and jobs potential. Strategic Policy S4 – Climate Change seeks to ensure that all proposals address the causes of, and adapt to the impacts of, climate change.</p> <p>The enhancement of tourism and local shops are both recognised as key issues of the RLDP (issues 8 &amp;9), and as such the Deposit Plan includes an appropriate policy framework to assess such proposals, recognising the role they make to Monmouthshire’s local economy. Car parking charges are beyond the scope of the RLDP.</p>	No change required.
3367 / Mr Dawson Williams / Objection	Again, the infrastructure is just not there to support more houses in an over developed area.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3372 / Mrs Deborah Jones / Objection	Understand we need to create more housing in the Chepstow area but please consider our infrastructure first.	Chepstow’s role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence base.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	
3376 / Mrs Diane Cox / Objection	Reduce the houses being built in the area as no money going in from builders into local area. We need a lot more social housing than all these private houses.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>Spatially, the growth level set out in the RLDP is focussed on the County's most sustainable primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot including Severnside.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>The delivery of affordable homes is a key objective of the Plan, reflected in the 50% affordable housing policy requirement.</p>	No change required.
3377 / Mrs Edmunds / Objection	Need more schools.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>It identifies the key infrastructure needed including a financial contribution towards accommodating additional pupils or new schools, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites including those to be delivered via a S106 agreement with the site developers</p>	
3378 / Mrs Elizabeth Parnell / Objection	Do we REALLY need it?	<p>The preparation of a Local Development Plan is a statutory requirement of the Council. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p>	No change required.
3390 / Mr Craig / Objection	Caldicot East allocation - The project could be in much smaller chunks and spread out amongst the whole of the county.	<p>The growth level set out in Policy S1 is distributed throughout the County, focussing on the county's most sustainable primary settlements of Abergavenny, Chepstow, Monmouth and Caldicot, including Severnside. The spatial distribution of growth across the county is set out in Policy S2 – Spatial Distribution of Development – Settlement Hierarchy.</p>	No change required.
3405 / Mrs Helen Taylor / Objection	They are not interested in the growth of Chepstow without addressing the poor road infrastructure. The roads in Chepstow area are not built for this volume of traffic.	<p>Chepstow's role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence base.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding High Beech, any development affecting this junction must mitigate its</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	
3436 / Mr Christopher Banner / Objection	No infrastructure in place for building in the Chepstow area.	<p>Chepstow's role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence base.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding High Beech, any development affecting this junction must mitigate its traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		allocated sites, having regard to information provided by the relevant infrastructure providers.	
3439 / Dr Joshua Thomas-Parr / Objection	Not enough brownfields being used.	<p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	No change required.
3439 / Dr Joshua Thomas-Parr / Objection	Not sustainable - not looking at the infrastructure in the area that is needed such as increased number of sewage works and increasing the internet.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3442 / Mr Gareth Yates / Objection	Growth in population is not being supported by growth in infrastructure.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3444 / Mr Graham Parker / Objection	The growth strategy seems to only focus on existing communities which are over stretched and struggling to support existing residents, a more positive approach would	Paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	be a new town with designed infrastructure and road network to support it.	authority.” National Policy does, therefore, not allow New Settlements to be considered as part of the LDP process.	
3444 / Mr Graham Parker / Objection	I would like to see smaller developments with local employment, to facilitate this requires infrastructure to support health and wellbeing within the local community or new towns.	<p>The RLDP includes a range of sites in a range of sizes for both housing and employment uses, distributed across the county.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3459 / David Gill / Objection	The plans growth strategy should more clearly outline specific problems it will address.	Chapter 6 of the RLDP clearly sets out the core issues that the growth strategy seeks to address, including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. A full breakdown of the RLDP issues is also contained in Appendix 6 of the Plan.	No change required.
3464 / Mr Colwyn Knight / Objection	The numbers used for housing are far higher that is necessary and those suggested by WG guidelines.	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
<p>3469 / Mr Andrew Orrell / Objection</p>	<p>Wye valley is becoming a housing estate, polluting rivers, choking lanes. We don't need to grow. There is no infrastructure to grow into and no local jobs to support more expensive houses being built in Shirenewton with no transport links for those in need of affordable housing to get into Cardiff or much more likely Bristol to work and spend their money.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>With regards to the under provision of additional sites in Shirenewton, the RLDP’s spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes a lower level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3492 / Claire Richards / Objection	The level of growth in Monmouthshire will increase traffic on the M4, M48 and arterial routes due to out commuting to Bristol. A quota is specified for Affordable Housing but there is no quota for providing suitable homes for the over 55s, although the RLDP states there is an ageing demographic. There is a shortage of single level dwellings. Bungalows and flats in retirement villages, with on-site community facilities, are required to enable older people to socialise with their contemporaries, stay healthy, mobile and independent and not feel isolated. Many family homes would be freed up for younger people. Quotas required or developers will not build them.	<p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p> <p>With regards to the provision of homes for over 55s, Policy H7 – Specialist Housing, provides the policy framework to consider such proposals. Paragraph 12.91. provides details of the types of speciality housing Policy H7 refers to, including age-restricted general market housing, generally aimed at those over 55 as well as other types such as sheltered housing and residential care/nursing homes.</p> <p>In addition, Policy H8 – Housing Mix, seeks to ensure development proposals of 10 units or more include a range and mix of house types, tenures and sizes to help address the county’s demographic and affordability challenges.</p>	No change required.
3496 / Mr John Valentine / Objection	What types of businesses will be attracted to the area for employment and commercial development? How many jobs will be created? What percentage of employees will have to travel to the site from out of the area? These outline details should be publicised before implementation of the plan.	A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.	No change required.
3497 / Mrs Abigail Harden / Support	Supports as so far as affordable housing is extended beyond small families and look to provide for young, working people (18-25)	Support welcomed. The delivery of affordable homes is a key objective of the Plan, reflected in the 50% affordable housing policy requirement. The mix and tenure of	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>as currently unaffordable for single youths and no housing provision currently. Future impact on employment opportunities and negative impact on climate change with out commuters.</p>	<p>affordable homes will be agreed on a site-by-site basis in liaison with the Council’s Housing Team, reflecting the local housing need for the area.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. 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).</p>	
<p>3504 / Ms Alison Grenyer / Objection</p>	<p>The development in Caldicot is far too large. There is insufficient infrastructure in the area. Other brownfield sites could be utilised.</p>	<p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>With regards to allocation HA2 – Land to the East of Caldicot/North of Portskewett, the site represents an edge of settlement site, including the provision of a new school, local centre, amenity space and affordable housing. The site is sufficiently large to deliver the required infrastructure on-site.</p>	<p>No change required.</p>
<p>3509 / Dr Kate Coleman / Support</p>	<p>Pleased that there is no new housing in Magor and Undy as the area is already oversaturated with a decrease in doctor's appointments and investment needed in the primary school.</p>	<p>Support welcomed.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3522 / Mrs Mary Auton / Objection	There is there is no scope for growth in the plan as presented. No explanation as to how businesses will be attracted to the area. Businesses are already out off by the lack of good, accessible roads and the pointless 20mph limits.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.</p> <p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
3528 / Mr John Bennett / Objection	As stated previously Caldicot just can't handle any more families. There are families and individuals looking for affordable rented housing and cannot afford to buy. This should be considered before building to sell for profit.	<p>With regards to allocation HA2 – Land to the East of Caldicot/North of Portskewett, the site represents an edge of settlement site, including the provision of a new school, local centre, amenity space and affordable housing. The site is sufficiently large to deliver the required infrastructure on-site.</p> <p>The delivery of affordable homes is a key objective of the Plan, reflected in the 50% affordable housing policy requirement. The mix and tenure of affordable homes will be agreed on a site-by-site basis in liaison with the Council’s Housing Team, reflecting the local housing need for the area.</p>	No change required.
3532 / Mr Nigel Haines / Objection	Before building more houses, please improve/rebuild existing infrastructure - specifically GP/dental services. This will get worse if more houses are built. Roads are	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	struggling with capacity and are generally in a very poor state.	allocated sites, having regard to information provided by the relevant infrastructure providers.	
3547 / Mr Jon Palmer / Objection	Infrastructure improvement is needed before any further 'sustainable' growth is implemented. Vanity projects and housing will not fix the issues plaguing the area.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3550 / Mrs Amanda Graham / Objection	Think about the increased volume of traffic, the travel routes, motorway access, public transport, the schools, doctors' surgeries, the health and care provision, distance from hospitals. This is a list of things that are already causing issues in Monmouthshire. These need addressing before any more housing development.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3570 / Mr Anthony John Hall / Objection	There is no need for a "growth" plan when the locality is denied improvements to all aspect of infrastructure. This is especially true for vehicle movement around Chepstow which has long queues for the significant parts of day time.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>application stage and satisfy Policy ST1 – Sustainable Transport Proposals. With specific regard to Chepstow and the High Beech roundabout, any development affecting this junction must mitigate its traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	
3603 / Mr Darren / Objection	Growth is required, do it where there is not an existing issue, or at least include traffic relief.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. The RLDP's spatial strategy has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including the Severnside area) and Monmouth.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Suitable measures must be provided for consideration as part of the planning application process.</p>	No change required.
3609 / Mr David Hawkins / Support	I support building homes, but it must come with additional facilities and infrastructure, and the current plans do not adequately articulate any forethought on these considerations.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	
<p>3632 / Mr George RV Ashworth / Objection</p>	<p>Housing target of 5,400 - 6,210 is excessive. WG letter of 27th August 2021 stated that the proposed housing growth should be no more than 4,275 units. The Preferred Strategy higher figure of 5,400 was only acquiesced to by WG in a later letter of 26th Jan 2023 on the basis of need for affordable homes and concluded that further technical work is required to demonstrate soundness. There is an absence of credible viability evidence that 50% affordable housing will be delivered, without which there is no justification for the RLDP to exceed the WG target of 4,275 units. The lower target would remove the need for major new housing allocations in Abergavenny, Chepstow and Monmouth, and the secondary settlements of Raglan, Usk and Penperlleni.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
<p>3632 / Mr George RV Ashworth / Objection</p>	<p>A 15% flexibility allowance is unjustified. The justification noted in the Housing Background Paper will result in the over-allocation of sites that will lead to cherry-picking by developers such that more sites will be developed than justified and the most difficult sites will be left to last. This would exacerbate the slowness of the very large sites and affect their already questionable viability. The flexibility should be 10%.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p>	<p>No change required.</p>
<p>3635 / Mr Gavin Rees / Objection</p>	<p>Development directly on High Beech should be opposed as it will contribute directly onto roads feeding what is already a huge bottleneck. Any houses here will also be subject to pollution from all the queuing traffic in this area</p>	<p>Chepstow’s role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence base.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding High Beech, any development affecting this junction must mitigate its</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>Site specific requirements relating to the allocation at Mounton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounton Road, Chepstow.</p>	
3702 / Keith Plow / Objection	How about pre-planning? Present facilities are inadequate and the use of "outdated data" is very poor. Need proper forward planning.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3717 / Mr Jack Laphorn-Graham / Objection	Remove new housing from plan.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3736 / Mr Hugh Taylor / Objection	This is a paradox, - supportive of the plan but the economic reality is that South Monmouthshire and neighbouring Newport are dormitories for Bristol and Cardiff as the economic drivers of the Western Gateway area. Without suitable transport links and road improvements the policy ambitions will be a failure.	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period rather than a target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Jobs will be delivered through a range of sectors including B use class industries as well as foundational sectors such as tourism, leisure, food, retail, and agriculture, all of which play an important role in Monmouthshire’s economy. This reflects the character of the wider economy of South-East Wales and should be supported in line with the ‘whole economy’ approach that is advocated by national planning policy.</p> <p>In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the county and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>The RLDP incorporates a range of policies to help improve the transportation system, including Policy ST5 – Transport Schemes, which supports and safeguards transport schemes identified in the Local Transport Strategy (LTS).</p>	No change required.
3745 / Mrs Jenny Carpenter / Objection	I don’t believe Monmouthshire has the ability to deliver at pace - that is up to the developers and the speed and competence of the Planning department. Restrictions net zero and percentage of affordable	The RLDP is considered to be supported by a robust, proportionate and credible evidence base that demonstrates deliverability. In addition, the Plan contains a monitoring framework which will be used to assess whether the Plan’s strategy, policies and proposals are being delivered.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	homes will mean developments are on knife edge of affordability.	Site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.	
3757 / Mr Joseph Farrell MBE / Objection	Not feasible due to an overwhelmingly stretched infrastructure now.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3760 / Miss Julia Brown / Objection	It's weak.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.
3763 / Natalie Sandercock / Objection	Concerned WG evidence and projections for housing need in the county has been disregarded and the RLDP growth level is too high without the evidence to support the decision especially re development on greenfield land.	The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government's objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	
3794 / Mrs Lisa / Objection	No new properties.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	
3803 / Ms Lucy Hoare / Objection	More houses necessitate better infrastructure, flood planning, doctor's surgeries, schools, public transport.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3804 / Mr Luke Thompson / Support	We need more housing.	Support welcomed.	No change required.
3808 / Ms M K Annandale / Objection	Climate change is real and developing at an alarming rate, so all previous models are irrelevant when it comes to planning.	<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth. Strategic Policy S4 – Climate Change seeks to ensure that all proposals address the causes of, and adapt to the impacts of, climate change.</p>	No change required.
3811 / Mr Marc Sugrue / Objection	B8 & B2 Allocations for the Portskewett site need removal. David Broome's site currently acts as a source of tourism money to the local economy. The loss of this will be a loss to the area. Current industrial properties aren't fully utilised either.	<p>It is unclear which site is being referred to; however, it is taken to be EA1e – Land adjoining Oak Grove Farm, Caldicot, which allocates 6ha of land for B1, B2 and B8 uses. National planning policy requires Local Development Plans to make provision for employment land and this site is considered to make a valuable contribution to the level of employment land available in the county.</p> <p>In order to facilitate employment opportunities, the RLDP provides the policy framework to support sustainable job growth in the county and sits alongside the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth and also addresses existing employment provision in the County.</p> <p>The David Broome site was put forward for consideration for development as part of the candidate site process by the landowner. The Council will support the relocation of such a use to a new location, subject to detailed planning considerations.</p>	
<p>3828 / Mrs Sharon Gale / Objection</p>	<p>The plan for jobs growth is unrealistic. Low local incomes necessitate out commuting. Building more houses doesn't mean the town will grow and prosper. The last 15 years has seen little increase in new business and jobs.</p>	<p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period, rather than a precise target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised that the jobs figure is higher than some past trends, it is within the range of past performance in the County.</p> <p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to</p>	<p>No change required.</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>support/enable economic prosperity and sustainable job growth in the county, whilst working alongside the Council’s Economy, Employment and Skills Strategy (EESS).</p> <p>It is expected that the trend for working for home and remote working will continue in the longer term as a legacy of the Covid-19 pandemic and in accordance with Welsh Government’s ambition for 30% of the Welsh workforce working from or near home, making it less important where the jobs are located and therefore reducing commuting patterns as result of changing working habits.</p>	
<p>3836 / Steve Hoselitz / Objection</p>	<p>The level of housing growth including a 15 per cent flexibility allowance seems excessive. The Welsh Government letter of 27 August 2021 to MCC stated that the proposed level of housing growth should “be no greater than 4,275 units ... plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.” So that target fails to accord with Future Wales. While I completely support the desire to concentrate on affordable homes, you do not have to tweak overall limits to achieve this. The Welsh Government told you that your target was too high, but apparently gave you some leeway on the basis of need for affordable homes. But you were required to do further technical work to demonstrate the RLDP has met the tests of soundness in terms of growth in jobs and homes. I do not see any evidence that you have done this.</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noted that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The RLDP has been prepared with regard to relevant legislation, national planning policy and regional/local strategies, and the Plan’s strategy, policies and proposals</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		have been informed by a robust evidence base in the form of various background reports and supporting studies relating to key local issues for the Plan to address.	
3849 / Mr Matthew Jenkins / Objection	Plans are unfair as stopped this from happening in the past.	As no site reference is given it is unclear which site the comments relate to, and it is, therefore, not possible to provide a response.	No change required.
3850 / Mr Maurice Burns / Objection	The objection is not regarding the building of houses, but the number is a huge percentage of new compared to existing. It's already difficult to make a doctor's appointment and the transportation system doesn't cope today. Growth without infrastructure first is not the correct way to go.	<p>As no site reference is given it is unclear which site the comments relate to, however, on a strategic level, the growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3862 / Mr Mike Gorshkov / Objection	I cannot find reference to increasing capacity of utilities, health, education or road network to accommodate existing and future development. We do not need growth for growth's sake. If the Welsh Assembly want growth place it next to the Welsh Assembly.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	
3867 / Mr /Mrs White / Objection	Build on former industrial sites including Newhouse farm industrial estate and Caldicot industrial estates.	Newhouse Farm and Severn Bridge (Caldicot) industrial estates form an important part of Monmouthshire's employment land provision and are protected for that purpose under Policy EA2.	No change required.
3872 / Mr Monks / Support	All for affordable homes in areas with good public transport links and/or accessible to town centres on foot or bike.	Support for affordable housing objectives of the Replacement Local Development Plan (RLDP) is welcomed. With regards to the RLDP's spatial strategy, this has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including the Severnside area) and Monmouth. New development is therefore focussed on the primary settlements, with a lower level of growth directed to the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality.	No change required.
3873 / Mr V G Danks / Objection	S1 is correct in relation to net-zero and sustainability issues, however, there is too much focus on housing for the youth and only cursory acceptance is made to some locations, specifically Severnside will become a commute suburb for Bristol. Plan needs to address the housing needs of the 'aging population'. Job figures for 8 years of the Plan equates to 3328 not 6240.	<p>Rebalancing the County's demography is a key objective of the Plan, however, meeting the needs of county's aging population is recognised, with increasing the younger population seen as part of the measures for doing so, to help create a sustainable balanced community. With regards to the provision of homes for the ageing population, Policy H7 – Specialist Housing, provides the policy framework to consider such proposals. Paragraph 12.91. provides details of the types of speciality housing Policy H7 refers to, including age-restricted general market housing, generally aimed at those over 55 as well as other types such as sheltered housing and residential care/nursing homes.</p> <p>The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period, rather than a precise target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised that the jobs figure is higher than some past trends, it is within the range of past performance in the County.</p> <p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. It is expected that the trend for working for home and remote working will continue in the longer term as a legacy of the Covid-19 pandemic and in accordance with Welsh Government’s ambition for 30% of the Welsh workforce working from or near home, making it less important where the jobs are located and therefore reducing commuting patterns as result of changing working habits.</p>	
3876 / Mrs Morgan / Objection	Growth opportunities to other areas, not at HA3.	The growth levels proposed for the primary settlements, including Chepstow, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3881 / Mrs Natasha Baker / Objection	The objection to be upheld and no houses built.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.
3886 / Mrs Nerys Wilson / Objection	Disproportionate growth to the capacity of Shirenewton.	The RLDP's spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes a lower level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality. The level of growth proposed for Shirenewton is considered to be acceptable having regard to the evidence base.	No change required.
3887 / Mr Nicholas Clayton-Ford / Support	Fully support to create economic growth.	Support welcomed.	No change required.
3894 / Mrs P A Davies / Objection	If growth is desirable, plans should include infrastructure too. A by-pass to Chepstow is needed urgently as more and more homes are built and proposed in Monmouthshire and Gloucestershire.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	
3900 / Mr Peter Cresswell / Objection	<p>More housing, shops and fast food outlets will encourage more traffic to Chepstow when the high street is neglected. The high street should be developed before more out of town fast food outlets are allowed.</p>	<p>Chepstow's role as a primary settlement in the County is recognised in the Sustainable Settlement Appraisal and the Settlement Hierarchy set out in Strategic Policy S2, reflecting the range of services, facilities and transport provision available in the settlement. The level of growth allocated to Chepstow is therefore considered to be appropriate reflecting this evidence.</p> <p>Sustaining and enhancing the county's town centres including Chepstow, is a key objective of the RLDP, with Policy S14 – Town, Local and Neighbourhood Centres, reinforcing national planning policy's retail hierarchy and town centre first principle. Out of town proposals would be required to satisfy the requirements of Policy RC4 – New Retail Proposals Outside of Identified Town and Local Centres.</p>	No change required.
3906 / Mr Philip Taylor / Support	<p>Supports the "sustainable and resilient communities strategy" however notes the linkage between housing and employment is weak and just making land available for industry may not be enough.</p>	<p>Support for the overarching strategy is welcomed.</p> <p>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).</p> <p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
3915 / Mrs Rebecca Reed / Objection	<p>Level of growth is too much in some areas. Should be spread across the county evenly, and located where road systems are not</p>	<p>The RLDP's spatial strategy has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	already congested, so as not impact communities.	accordance with this. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including the Severnside area) and Monmouth, with the majority of the RLDP's growth level allocated within these settlements. A lower proportion is distributed to the Secondary Settlements and the most sustainable lower tier settlements, to deliver much needed affordable homes and to address rural inequality.	
3925 / Mr Richard Lansberry / Objection	It's an interesting figure, 6,210 houses to meet a requirement of 5,400 homes for the growth strategy for Monmouthshire. Ever since the removal of the bridge tolls the demand for houses in Monmouthshire - demand being generated by people from the Bristol.	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p> <p>The 6,210 figure includes a 15% flexibility allowance, in accordance with the Development Plans Manual (Ed 3) must be embedded into the plan to accommodate changing circumstances. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p>	No change required.
3933 / Mr Robert Maidment-	Growth is not a universal panacea. Change for changes sake is never desirable.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Wilson / Objection	Undesirable changes can never be reversed.	homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	
3940 / Mrs Ruth Lock / Objection	Grey sites should be used, not green ones.	<p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	No change required.
3945 / Miss Samantha Haggins / Objection	<p>The problem with the growth plan is that there is already an infrastructure problem in Chepstow. We have 3 doctors' surgeries that are already bursting at the seams. My last appointment took me 5/6 weeks to get seen.</p> <p>This needs to be addressed before anymore more development goes ahead. We have maybe 2 dentist that aren't private in Chepstow.</p>	<p>The growth levels proposed for the primary settlements, including Chepstow, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>The rate of traffic in Chepstow is terrible. The emissions test from bulwark corner will tell you that grossly high. How can you consider building anything when this still hasn't been addressed in the 20 years I've lived it's only got worse.</p>	<p>allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>Welsh Government is currently undertaking assessments (WelTAGs) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>Site specific requirements relating to the allocation at Mounton Road, Chepstow are set out in policy HA3, which includes policy requirements relating to the provision of active travel routes, public transport improvements and air quality measures and mitigation. Additional detail on these points can be found in relation to the comments received on Policy HA3 – Land at Mounton Road, Chepstow.</p>	
<p>3946 / Mrs Sandra Irwin / Objection</p>	<p>The housing growth figures are still predicated on creating huge numbers of new jobs in the county, but there is no evidence that this is possible, and then not to compete with the higher paid jobs available in neighbouring areas. There must therefore be a risk that new homes so close to the M48 (i.e. Chepstow in general) would attract out-commuters (e.g. to Bristol, Newport, Cardiff) and actually work against the plan's ambition to create thriving local communities which are less reliant on private car usage. Are you actually satisfying demand from present residents or commuters?</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. The jobs figure contained in the RLDP is based on demographic-led modelling which is considered to be robust and includes reasonable assumptions. The associated jobs figure represents the number of jobs that could be supported by the population and housing growth planned for over the Plan period, rather than a precise target. It is recognised that it is above the baseline forecasts, however, a policy-on approach provides an appropriate basis for the RLDP to ensure that the Plan can be sufficiently flexible in respect of changing circumstances and that the County can support long term economic growth in accordance with Welsh Government policy, which encourages the adoption of a long term and positive strategy, and the economic ambitions of the Council and the Cardiff Capital Region. Whilst it is recognised that the jobs figure is higher than some past trends, it is within the range of past performance in the County.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development,</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth including small/medium businesses. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
3960 / Ms Sophie / Objection	<p>The numbers given don't add up to what is needed in the area. It seems to have been largely inflated. 2064 households in housing need is vastly exaggerated as I believe the houses/ properties are already there on the market and available I think the people require better support to get in to them. There would be a better scheme for a company to buy houses locally to sell to these households in need with the 'Affordable housing scheme support'</p>	<p>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 Brecon Beacon National Park area within Monmouthshire, applying assumptions in relation to migration household membership rates and commuting ratio. 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.</p> <p>In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p>	No change required.
3971 / Miss Sue Netherway / Objection	<p>We cannot increase the population of Monmouth without increasing the infrastructure. There are not enough GPs for example. It has been stated that the population is becoming more elderly here. But this is a national trend. In any case, young people go away to university and stay away because there are no jobs here.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>The only jobs available (see Indeed November 2024) are mainly minimum wage care/retail jobs.</p>	<p>timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>Supporting and enabling sustainable economic growth is a core objective of the Replacement Local Development Plan (RLDP) which is reflected in its policy framework. The RLDP sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
<p>3972 / Mrs Sue Young / Objection</p>	<p>The proposed allocation for Caldicot is nearly twice that of the next largest development, the site/area does not have the infrastructure to support a development of this size - doctors and dentists are already oversubscribed and roads congested particularly at Highbeech roundabout. 6.3.5 How can you ensure that the 'homes we deliver will match people's ability to pay'? Older people are economically active and probably spend more in the local economy than younger people who tend to buy more online. 6.3.8 Older people do not necessarily want to downsize from their large family homes which hold a lifetime of memories. 6.3.9 Habitats have already been destroyed creating the green pathway along the old railway line under the pretence of ash dieback, I have been informed by a forestry worker that there were no ash trees, it will take years for new habitats to be re-</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth. The protection, enhancement and resilience of Monmouthshire’s natural environment, biodiversity and ecosystems is a key objective of the RLDP, with Policy NR1 – Nature Recovery and Geodiversity setting out the policy parameters against which proposals will be assessed.</p> <p>Sustaining and enhancing the county’s town centres including Caldicot, is a key objective of the RLDP, with Policy S14 – Town, Local and Neighbourhood Centres,</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>established. 6.3.11 There are already vacant shops, offices and units in Caldicot - HOW do you propose to create jobs and attract businesses? 6.3.13 Caldicot will always have high levels of out-commuting due to the higher skilled jobs/wages in Bristol; and the influx of residents from Bristol. 6.3.19 How do you propose to increase the number of agricultural jobs when you are decreasing the amount of agricultural land?</p>	<p>reinforcing national planning policy’s retail hierarchy and town centre first principle.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth including small/medium businesses. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p> <p>A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land, how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognise that while significant areas of BMV will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.</p>	
<p>3983 / Mr Tim James / Objection</p>	<p>Object to the excessive housing target and 15% flexibility allowance. Welsh Government letter of 27 August 2021 stated the level of housing growth should be no greater 4,275 units. Welsh</p>	<p>The growth level of 5,400 homes housing requirement and supporting the provision of up to 6,240 jobs strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a</p>	<p>No change required.</p>

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	<p>Government's January 2023 letter only agreed to the 5,400 housing requirement on the basis of need for affordable homes, but concluded further technical work was required to demonstrate the Plan is sound. There is an absence of credible evidence that 50% affordable housing will be achieved, there is therefore no justification for exceeding the WG housing target of 4,275 units. A reduced housing target would reduce pressure on Minor Villages.</p>	<p>number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a 'green' rating and noted that "Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire."</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's previous concerns regarding alignment with Future Wales.</p> <p>In accordance with Welsh Government guidance, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which formed part of the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>With respect to growth in the Minor Rural Settlements, the RLDP does not make any site-specific allocations in this tier of the settlement hierarchy.</p>	

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3984 / Mr Tim Monckton / Objection	I don't think our population growth reflects the plan - I think the housing numbers are not targeted at just the need for affordable homes which is the need but are aiming at bringing more people into the towns / making money for the developer / council.	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.	No change required.
3988 / Mrs Tracey / Objection	Understand the need for more affordable homes for local people but the majority will be taken by people who live outside of the community. People will come here and commute to work not work in the local area.	<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area.</p> <p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job growth in the county and sits alongside the Council's Economy, Employment and Skills Strategy (EESS) which sets out the Council's direction of travel and action plan for delivering job growth including small/medium businesses. The RLDP has a key role supporting the Council's vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	No change required.
3995 / Mrs Victoria Clark / Objection	Object to all of it.	The preparation of a Local Development Plan is a statutory requirement of the Council. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography,	No change required.

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		<p>while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key 'Tests of Soundness' of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan's Vision and Strategy are positive and sufficiently aspirational.</p>	
<p>3996 / Mr William Fletcher / Objection</p>	<p>There is no need to have a growth strategy for Raglan, it's already big enough.</p>	<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p>	<p>No change required.</p>

## Strategic Policy S2 – Spatial Distribution of Development – Settlement Hierarchy

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1061 / Bannau Brycheiniog National Park (BBNP) / Objection	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.	<p>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.</p> <p>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).</p>	No change required.
1209 / Aneurin Bevan University Health Board / Support	Welcome the spatial strategy of locating new development according to the hierarchical structure, with most residential development growth located in primary settlements. Also welcome the plans to expand provision of affordable homes which may help to alleviate workforce challenges/shortages in areas such as social care which will also support the foundational economy.	Support welcomed.	No change required.
1299 / Gloucestershire County Council / Comment	Note the quantum of development on Gloucestershire's border will not significantly impact its transport network, although the cumulative impacts of development onto the A48 corridor from Caldicot to Lydney will need to be	<p>Comments noted. Monmouthshire County Council has and will continue to liaise with neighbouring local authorities on cross border issues, including in relation to proposed levels of growth in emerging local development plans.</p> <p>Discussions have taken place with neighbouring English authorities as part of the Duty to Cooperate process in England with regard to the potential for Monmouthshire to accommodate additional growth from these authorities. As part</p>	No change required.



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	<p>considered. State in the Forest of Dean transport infrastructure is already highly constrained and therefore support measures to divert transport demand onto modes other than the private car.</p>	<p>of this process, MCC advised that Monmouthshire is unable to accommodate unmet housing need for neighbouring authorities. This is because the RLDP’s growth strategy seeks to strike a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. The level of growth proposed in the Deposit Plan has been deemed to be in conformity with Future Wales by Welsh Government and is, therefore, considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p>	
<p>1299 / Gloucestershire County Council / Comment</p>	<p>Refer to the Chepstow Transport Study undertaken to severe congestion leading to air quality issues and journey time uncertainties. Suggest the scale of development proposed will not draw in significant developer funding to go towards delivery of the measures in the Chepstow Transport Study.</p>	<p>Comments noted. The RLDP transport policy framework reflects national policy which seeks to ensure that development is located and designed in accordance with the Sustainable Transport Hierarchy, with a focus on a reduction in the need to travel and a shift away from the private car for travel.</p> <p>With specific regard to Chepstow and reflecting aspirations to improve sustainable transport travel in the town, Welsh Government has committed to delivering WeITAG 1 and 2 studies in collaboration with key partners, including Monmouthshire County Council and Transport for Wales, to identify and assess various options to improve transport movements at the key intersection at Highbeech roundabout and Chepstow as a whole. MCC will continue to work with WG and other partner organisations on this matter, including in relation to potential funding sources to deliver identified schemes. Of note, the proposed site allocation of Land at Mounon Road identifies and safeguards land in the southeast part of the site for potential improvements to the roundabout, if required.</p> <p>Furthermore, Monmouthshire’s Local Transport Strategy sets out a range of transport improvement schemes in Chepstow, including a Transport Hub and active travel links, to address transport issues in the town.</p>	<p>No change required.</p>
<p>1356 / Welsh Government / Support</p>	<p>The WG note improvements to the wastewater treatment works (WwTWs) that serve Monmouth and Llanfoist have</p>	<p>Support welcomed. As noted, the Deposit Plan has been progressed in accordance with Welsh Government’s comments received in relation to the Preferred Strategy (2022), which advised the Council ‘that new site allocations should be considered in</p>	<p>No change required.</p>

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	<p>been confirmed, thereby enabling the allocation of development at these sustainable locations. Monmouth is identified as a Primary settlement, as set out in the settlement analysis, which reflects the ability to allocate sites to reflect this analysis, whilst removing the phosphate barrier that was previously the case. The WG has no objection on the distribution/scale of growth in relation to phosphates.</p>	<p>Monmouth on the basis that sufficient certainty is provided by Dwr Cymru Welsh Water's (DCWW) planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.' A proportion of growth has therefore been apportioned to Monmouth as per Strategic Policy S2.</p> <p>The Council has been working collaboratively with a range of organisations including NRW, DCWW, Welsh Government, other Councils in Wales and England, environmental groups, developers and other stakeholders to establish solutions that will ensure that development proposals do not have an adverse impact on water quality within the SAC rivers. The spatial strategy and site allocations have been prepared with regard to DCWW's planned improvements to wastewater treatment works and NRW's review of permits. Commitment from DCWW to provide phosphate mitigation at the Llanfoist and Monmouth WwTWs and NRW's review of all permits and water quality to establish what capacity (if any) exists to enable development proposals to come forward while ensuring betterment or neutrality of phosphate levels has provided the necessary confidence to support the RLDP strategy.</p>	
1356 / Welsh Government / Support	<p>Welsh Government does not object to the Deposit Plan settlement hierarchy and distribution of housing growth with 85% of all new housing development proposed in the Tier 1 settlements which includes the Severnside cluster. The number of new homes proposed in Tier 3 Settlements and Tier 4 Rural Villages are now specified separately, in accordance with the DPM.</p>	<p>Support welcomed. For clarity, the housing figures have been updated to take account of the 2024/25 housing monitoring period, with consequential changes reflected in the Housing Background Paper (2025) and an updated Strategic Policy 2.</p>	No change required.
2031 / Peter Fox OBE MS Senedd Member for the Monmouth Constituency / Objection	<p>Disappointing Welsh Government wouldn't support new settlements more generally as we see existing settlement infrastructure saturated.</p>	<p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that "due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority." National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.</p>	No change required.

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<p>1677 / Councillor Frances Taylor / Objection</p>	<p>Monmouthshire is not part of the strategic growth area and whilst there must be some growth, the spatial strategy once again places a disproportionate, particularly employment-based allocations in Magor with Undy, and above the protection of the Gwent Levels, the integrity of the Llandeenny and Redwick SSSI and the Council's declared nature and climate emergency.</p>	<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth and 65% of employment provision, however, this approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>All formal stages of the Plan have been subject to an Integrated Sustainability Appraisal (ISA) to assess the extent to which the Plan’s proposals and policies will help achieve the wider environmental, economic, social and cultural objectives of the RLDP. Similarly, a Habitats Regulations Assessment (HRA) of the RLDP has been undertaken to determine the likely significant effects of the Plan, either individually or in combination with the effects of other plans and projects, on European sites of nature conservation importance. In addition, national planning policy alongside the RLDP provides the policy framework to undertake further detailed site assessments as allocations progress through the planning application process.</p>	<p>No change required.</p>

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		<p>Employment allocations made in the Magor/Undy area are roll over/existing allocations from the Adopted LDP and are not new allocations. These are considered to be of strategic importance to the County and their retention is considered to be justified line with the findings of the Employment Land Review (Nov 2022) and the Council’s economic ambitions set out in the Economy, Employment and Skills Strategy (EESS). The continued allocation of EA1f – Quay Point, EA1g – Rockfield Farm, and EA1h – Gwent Euro Park are considered appropriate given their strategic location in close proximity to the M4 corridor. They are also considered to be necessary to provide a range and choice of employment sites throughout the County, including the south.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
<p>1677 / Councillor Frances Taylor / Objection</p>	<p>Once again, this RLDP sees the largest distribution of growth in Severnside (35% residential and 65% employment) citing it as a sustainable settlement. It is not sustainable. The last LDP delivered a disproportionate and significant (circa 500) new dwellings in Magor with Undy, something like a 17% increase. Although there are no new housing allocations in Magor with Undy, the strategic development at Caldicot East and in Newport Glan Llyn, will have a cumulative impact on the road network. Integrated public transport schemes in policy ST5 pertaining to Magor and Undy must be delivered before houses in Caldicot East are occupied.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth and 65% of employment provision, however, this approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>There are no new residential allocations made in the RLDP in the Magor /Undy area, and the employment allocations are roll over/existing allocations from the Adopted LDP and are not new. These are considered to be of strategic importance to the County and their retention is considered to be justified line with the findings of the Employment Land Review (Nov 2022) and the Council’s economic ambitions set out in the Economy, Employment and Skills Strategy (EESS). The continued</p>	<p>No change required.</p>

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		<p>allocation of EA1f – Quay Point, EA1g – Rockfield Farm, and EA1h – Gwent Euro Park are considered appropriate given their strategic location in close proximity to the M4 corridor. They are also considered to be necessary to provide a range and choice of employment sites throughout the County, including the south.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p> <p>Comments noted with regards to the public transport scheme listed under policy ST5 – Transport Schemes. As noted in the RLDP, these are schemes identified in the Local Transport Strategy for which support, and safeguarding has been applied in the RLDP to facilitate their delivery. In addition to these schemes, each residential allocation and the Infrastructure Delivery Plan set out sustainable travel and highway requirements associated with allocation.</p>	
1677 / Councillor Frances Taylor / Objection	50% of Monmouthshire’s economic development land is concentrated in Magor with almost all of it allocated on Quay Point and Gwent Europark. These the two sites in Llandeenny, Magor serve to wipe out the historic hamlet. The administration’s lazy approach to considering employment land is disproportionate and is contradictory to the stated intent of the plan in terms of climate, ecology and preserving the Gwent Levels landscape.	<p>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.</p> <p>National planning policy requires Local Development Plans to make provision for employment land. An Employment Land Review (Nov 2022) was undertaken as evidence to inform the level of land required and the sites to allocate. The employment land provision figure of 57ha set out in Policy S10 – Employment Sites Provision, reflects the findings of the Employment Land Review (Nov 2022), take-up figures that have occurred in the Plan period to date, and an increased level of employment provision above the minimum recommended 38ha to provide more flexibility in supply given that allocation EA1f – Quay Point, Magor accounts for a significant proportion of the allocations. The approach taken is, therefore, considered to provide an appropriate balance between providing sufficient land to meet the minimum requirement whilst also providing sufficient land to offer a range and choice of sites throughout the County.</p>	No change required.

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		<p>A review of the existing employment allocations made under the Adopted Local Development Plan (LDP) was also undertaken as part of the evidence base, with a number of sites discounted and not rolled forward into the RLDP. However, following the candidate site assessment process, a number of undeveloped LDP sites have been rolled forward as they are considered to make a valuable contribution to the County's employment land supply. This is the case for allocations EA1f – Quay Point, Magor, and a reduced allocation from that in the Adopted LDP, at Gwent Euro Park under EA1h, which is also recognised as being of regional significance in the Regional Employment Study (March 2020).</p>	
1677 / Councillor Frances Taylor / Objection	<p>Policy S2 states that outside of Tiers 1 – 4 open countryside policies will apply and a definitive list of what is development is allowed is provided. Para 7.1.3 states for the purposes of the RLDP, open countryside is defined as land outside the defined settlement boundaries. BUT there are many other policies allowing development other than the definitive list in S2 adjacent to settlement boundaries and therefore in open countryside: H7 - Specialist Housing; E2 – Non-Allocated Employment Sites; S11 – Rural Economy; RE1 – Secondary and main Rural Settlements Employment Exceptions; and S15 – Community and Recreation Facilities. There is a conflict and it is misleading. Policy S2 needs updating to include these.</p>	<p>Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy S2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list. It is therefore proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>	<p>Amend Strategic Policy S2 to read:  Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>
1803 / Councillor Dr Louise Brown / Objection	<p>The proposal does not make it clear that the main towns in the Southern area as so close together in terms of Chepstow, Caldicot and the Severnside area and thereby the level of development is unsustainable.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales. Spatially, the growth is considered to be well distributed throughout the County and reflects the</p>	<p>No change required.</p>

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		<p>findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>The allocations contained within the Deposit Plan are spatially represented on the Proposals Plan, which in accordance with the Development Plans Manual (Ed 3) forms part of the Development Plan.</p>	
1803 / Councillor Dr Louise Brown / Objection	It is incorrect to call all of the development as Caldicot East as it is North Portskewett area which is just a village merging with Caldicot as part of urban sprawl.	The title Land to the East of Caldicot / North of Portskewett is considered to reflect that the proposal will extend the settlement of Caldicot to the north-east and adjoin the Crick Road development site in Portskewett. Connections to Caldicot are an integral part of the proposal, and it is therefore considered appropriate to reflect this in the site name.	No change required.
1803 / Councillor Dr Louise Brown / Objection	Whilst only 3% of Monmouthshire is developed, 80% of this is in the South of the County and it will create large areas of continuous housing in a concentrated area. Local areas also suffer from waits for GP appointments and the lack of dentists as well as the lack of a local minor injuries' unit at Chepstow. By contrast Abergavenny still has its own minor injuries unit at Neville Hall hospital Abergavenny albeit there has been a cut in the overnight provision and there has been the significant road development in the Heads of the Valleys roads making the North of the County more sustainable than the South of the County.	<p>It is unclear where the statistic of 80% of existing development is in the south of the County has come from. However, from a population perspective rather than built development perspective, the 2021 Census recorded a population of 92,961 for Monmouthshire, of which 28% are recorded for the settlements of Abergavenny (including Llanfoist) and Monmouth alone. If settlements such as Usk, Raglan and Penperlleni are factored in, this will increase further.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers. The mechanisms for improved health infrastructure sit outside of the planning process, however, the Council is fully engaged with the health board (ABUHB) to deliver health care service improvements across the County.</p>	
1803 / Councillor Dr Louise Brown / Objection	In the last LDP Caldicot was not seen as a sustainable town.	The Adopted Local Development Plan (LDP) identifies Caldicot as being within the Severnside sub-region along with Caerwent, Magor, Portskewett, Rogiet, Sudbrook and Undy, similar in approach to the RLDP. Policy S6 – Retail Hierarchy, of the Adopted LDP also notes Caldicot as being a main town along with Abergavenny, Chepstow and Monmouth for the purposes of the retail hierarchy. In this respect, it is therefore considered that the Adopted LDP does identify Caldicot as a sustainable town. Regardless of the Adopted LDP’s position, the RLDP’s growth and spatial strategy appropriately reflects the Sustainable Settlement Appraisal (SSA), as key evidence underpinning the preparation of the RLDP.	No change required.
1803 / Councillor Dr Louise Brown / Objection	Chepstow is an unsustainable town for development as it cannot sustain its current level of traffic congestion, and more housing will bring it to a standstill.	<p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, including road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding Highbeech, any development affecting this junction must mitigate its traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>The Plan’s transport policy framework reflects national policy aspirations, including Welsh Government’s Wales Transport Strategy which prioritises measures that maximise mode shift from the private vehicle off the highway network to measures that promote sustainable travel, which includes prioritising active travel (walking, wheeling, cycling) and public transport use.</p>	
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>The distribution of residential development shows that 13% in Chepstow and 35% in Caldicot including Severnside which are in the South of the County and geographically very close together. This compares to Monmouth at 15% and Abergavenny at 22%. This means that nearly half the growth for the main towns is located in a geographically close area in the South of the County which already has 80% of the developed area and only about a third in the main towns in the North of the County. In my opinion, the residential growth should be concentrated in the North of the County which has a better infrastructure particularly in view of the development of Heads of the Valley roads.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
<p>2489 / Councillor Lisa Dymock / Objection</p>	<p>Over concentration of growth in one area – spatial strategy disproportionately concentrates development in urban areas such as Caldicot, Chepstow and Monmouth. A balanced approach including incremental growth in smaller settlements would prevent overburdening areas.</p> <p>Environmental concerns for growth areas – greenfield development threatens biodiversity and ecosystems contrary to the climate and nature emergencies. Should be greater focus on brownfield sites.</p> <p>Limited integration of employment and housing – most allocated housing sites are likely to become commuter zones due to limited job creation. Strategy needs to better align housing with employment.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>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). A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. In order to facilitate employment opportunities, the RLDP provides the policy framework to support/enable economic prosperity and sustainable job</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>growth in the county and sits alongside the Council’s Economy, Employment and Skills Strategy (EESS) which sets out the Council’s direction of travel and action plan for delivering job growth. The RLDP has a key role supporting the Council’s vision for economic growth and will be one of the main enablers in delivering sustainable economic growth and increasing employment opportunities in existing and emerging sectors. This ranges from a supportive policy framework to facilitate economic growth in a range of sectors, to identifying sufficient employment land.</p>	
<p>2497 / Councillor Paul Pavia / Objection</p>	<p>In relation to Chepstow, overarching concern is that the Mounton Road development contradicts local and national sustainability, environmental and legal policies. Call for policy revisions, improved traffic and air quality management, and a commitment to preserving the community's health, economy and natural heritage.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p> <p>The RLDP’s policy framework includes a range of policies to assess the development considerations raised including site-specific policy HA3 – Land at Mounton Road, Chepstow.</p>	<p>No change required.</p>
<p>2498 / Councillor Penny Jones / Objection</p>	<p>54 houses, industrial site and solar farm disproportionate to its needs - character of the village will be changed and this will</p>	<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>impact tourism. Will stretch Raglan's infrastructure to its limits.</p>	<p>informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.</p> <p>With regards to the solar allocation, Planning Policy Wales (PPW) notes that low carbon electricity must become the main source of energy in Wales and has set targets for the generation of renewable energy. It recognises that the planning system has an active role to help ensure the delivery of these targets. Alongside this, the Council has set out its own decarbonisation aspirations in its Climate and Nature Emergency Strategy (May 2024). The allocation made under Policy CC3 provides an opportunity to contribute to both national and local decarbonisation objectives.</p> <p>MCC received four solar renewable and low carbon energy candidate sites, as part of the Second Call for Candidate Sites. These were assessed as part of the wider candidate site assessment process, which concluded that the land put forward at Raglan Enterprise Park performed best compared to the other submissions and provides an opportunity to contribute to renewable energy generation targets.</p>	
<p>2505 / Councillor Steven Garratt / Support</p>	<p>Monmouth needs new housing and small business units. It is at risk of becoming a retirement town or dormitory town for those who commute, out of county. Need affordable homes for our public sector employees such as those in health and education. Severnside has had its fair share of growth. The plan looks sustainable for Monmouth.</p>	<p>Support welcomed.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3118 / Councillor Meirion Howells / Objection	Unsure if necessary for two sites in Little Mill.	<p>HA16 – Land North of Little Mill is a ‘rollover’ from the Local Development Plan and now has planning permission. The RLDP proposes one new allocation for Little Mill under policy HA15 – Land East of Little Mill. This has been made in accordance with the settlement hierarchy that has arisen from the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>Within the settlement hierarchy Little Mill is a Main Rural Settlement, with a good range of facilities, including a community hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the plan period to help sustain existing rural communities as per RLDP Objective 13.</p>	No change required.
1106 / Llanarth Fawr Community Council / Objection	Object to the new definition of allowing 'infill between existing buildings' in Tier 4 settlements such as Bettws Newydd, Great Oak and Llanarth from that contained in the existing LDP. This will create more residential infill opportunities contrary to the Minor Village status.	<p>The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW and meet the aims of RLDP objective 13 which seeks to sustain existing rural communities. The policy seeks to avoid encroachment into the open countryside, restricting development to the physical form of the settlement, but recognises that there may</p>	Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The relevant part of the policy will now read: “Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.”

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	
1106 / Llanarth Fawr Community Council / Objection	The Settlement Hierarchy is said in 6.4.3 to reflect the findings of the Sustainability Settlement Appraisal but no such appraisal was undertaken for Tier 4 settlements.	The Sustainability Settlement Appraisal covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council’s website at the time of the Deposit RLDP consultation was corrupt, so these settlements did not show properly. This matter has now been rectified, and the document is available to view on the Council’s website. The SSA, including the Tier 4 settlements were, however, considered in formulating the settlement hierarchy set out in Policy S2.	No change required.
1138 / Raglan Community Council / Objection	Raglan CC objects to the proposed level of growth in Raglan as a secondary settlement in Policy S2. Tier 2 growth has not been apportioned between the three tier 2 settlements. Concern expressed if Usk and Penperlleni as Tier 2 settlements have difficulties accommodating their allocated level of housing growth could this see their housing allocation redirected to Raglan.	<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>With regards to housing growth, all three Secondary Settlements have a proposed residential allocation identified in the RLDP. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth/Hereford and south towards Newport/Cardiff and Bristol, hence the promotion of such uses via the candidate site process.</p>	No change required.
1138 / Raglan Community Council / Objection	Raglan CC object to the new definition of allowing 'infill between existing buildings' in tier 4 settlements such as Gwehelog and Llandenny.	The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on	Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The relevant part of the policy will now read:

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		<p>infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW and meet the aims of RLDP objective 13, which seeks to sustain existing rural communities. The policy seeks to avoid encroachment into the open countryside, restricting development to the physical form of the settlement, but recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	<p>“Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.”</p>
1138 / Raglan Community Council / Objection	The Settlement Hierarchy reflects in para 6.4.3 the findings of the Sustainable Settlement Appraisal, but no such appraisal was undertaken for Tier 4 settlements.	The Sustainability Settlement Appraisal covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council’s website at the time of the Deposit RLDP consultation was corrupt, so these settlements did not show properly. This matter has now been rectified, and the document is available to view on the Council’s website. The SSA, including the Tier 4 settlements were, however, considered in formulating the settlement hierarchy set out in Policy S2.	No change required.
1255 / Home Builders Federation (HBF) / Support	No comments provided.	Support welcomed.	No change required.
1367 / Abergavenny and	No comments provided.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
District Civic Society / Support			
1984 / Raglan Village Action Group / Objection	<p>Object to the level of growth for secondary settlements resulting from the excessive housing target and flexibility allowance in S1. Also, object to the excessive 6.05ha of employment growth as 4.5ha is allocated to Raglan. The redirection of growth in the same tier where it cannot be met by other settlements should be removed as this could result in Usk and Penperlleni's growth redirected to Raglan.</p>	<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>With regards to housing growth, all three Secondary Settlements have a proposed residential allocation identified in the RLDP. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.</p> <p>The Deposit Plan sets out detailed allocations to meet the growth level set out in S1. Reference to development being directed towards a same tier or higher tier settlement within the same Housing Market Area reflects the site selection process that has taken place to reach the Deposit stage and is considered to be an appropriate approach to take to site selection.</p>	No change required.
2532 / Cwmpas Community Housing / Objection	<p>Community led affordable housing has indirect relevance and contribution to the policy. Direct and overt reference to community led housing could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Monmouthshire.</p>	<p>Strategic Policy 2 sets out the RLDP's spatial strategy and the settlement hierarchy considered best to address Monmouthshire's core purpose of building sustainable and resilient communities for all. Reference to community led affordable housing is therefore not considered appropriate in this context.</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2548 / Shirenewton Community Council / Objection	Lacks policy protection for villages. Ribbon development along the M4/M48 contrary to Welsh Government Policy.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. In line with the SSA, villages are identified as being at the bottom of the hierarchy, either tier 3 or 4 dependent on the level of services, public transport provision and other criteria set out in the SSA. This approach is considered to offer an appropriate level of protection to Monmouthshire’s villages, whilst allowing for a lower level of growth to deliver much needed affordable homes and to address rural inequality.</p> <p>The spatial distribution of growth in the south of the County is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	No change required.
2548 / Shirenewton Community Council / Objection	<p>Whilst appreciate there is a need for some housing units to be added to Shirenewton, concerned that our villages being grouped in the Tier 3 Rural Settlements, the new housing allocation for Tier 3 and 4 jointly is 108 units giving an average of 2.4 units per settlement which in Shirenewton's case might be fulfillable from repurposing small redundant buildings within our villages. HA18 will add 26 units, more than 10 times the Tier 3 and 4 average, which is considered to be manifestly unfair. There is already planning consent for 15 houses as</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. This includes a proportion of growth to the County’s most sustainable rural settlements to deliver much needed affordable homes and address rural inequality. The new RLDP allocations proposed for the Tier 3 settlements are allocated over five sites across the County, with an additional site at Little Mill which is a ‘rollover’ allocation from the Local Development Plan. This approach is considered to be more appropriate than a lower rate dispersed across more settlements, to ensure developments are sufficiently sized to deliver the key policy requirements of the plan including 50% affordable homes, net zero carbon homes, and green infrastructure and net biodiversity requirements.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>yet unbuilt, and with HA18 the disproportionate impact of development would overwhelm our existing 280 households.</p>		
<p>3059 / Magor with Undy Town Council / Objection</p>	<p>There are many other policies allowing development other than the definitive list in S2 adjacent to settlement boundaries and therefore open countryside. There is a conflict and it is misleading. Policy S2 needs updating.</p>	<p>Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy S2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list. It is therefore proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>	<p>Amend Strategic Policy S2 to read:  Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>
<p>3059 / Magor with Undy Town Council / Objection</p>	<p>RLDP sees the largest distribution of growth in Severnside citing it as a sustainable settlement. It is not sustainable. Strategic development at Caldicot East and Glan Lyn Newport has a cumulative impact. Integrated public transport schemes in policy ST5 pertaining to Magor and Undy must be delivered before houses in Caldicot East are occupied.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	
3602 / Llanbadoc Community Council / Objection	<p>Little Mill cannot be classified as a sustainable settlement when compared to other areas yet is currently being subjected to two new dwelling proposals. Further development in Little Mill will compound the issue of sustainability of the village, due to the lack of amenities and public transport links. Proposed Mamhilad Park Estate development will negate any need for new housing in Little Mill.</p>	<p>HA16 – Land North of Little Mill is a ‘rollover site’ from the Local Development Plan and now has planning permission. The RLDP proposes one new allocation for Little Mill under policy HA15 – Land East of Little Mill. This has been made in accordance with the settlement hierarchy that has arisen from the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP’s objectives.</p> <p>Within the settlement hierarchy, Little Mill is a Main Rural Settlement, with a good range of facilities, including a community hall, recreation ground and church as well as good road links and access to public transport, and as such is appropriate for small scale growth over the plan period to help sustain existing rural communities as per RLDP Objective 13.</p>	No change required.
3902 / Usk Civic Society / Objection	<p>Objects to the level of growth for secondary settlements resulting from the excessive target and flexibility allowance in Policy S1.</p>	<p>The growth level set out in Policy S1 strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>The growth levels proposed for the Secondary Settlements has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth</p>	

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		proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.	
3562 / Gateway to Wales Action Group / Objection	Question whether Chepstow is getting its fair share of housing given it is within easy commuting distance of well-paid jobs in North Bristol.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p>	No change required.
1259 / Llanover Estates / Objection	A commensurate proportion of employment growth should be directed to Main Rural Settlements, such as Llanover, consistent with the spatial strategy of the RLDP.	The need to sustain and regenerate the County's rural economy is also a key objective of the Plan with Policy S11 - Rural Economy, providing the strategic policy objectives in this regard. Policy RE1 – Secondary and Main Rural Settlements Employment Exceptions, allows for the consideration of employment opportunities within or adjoining main rural settlements, subject to detailed development considerations.	No change required.
1281 / Barratt David Wilson Homes (LRM	Spatial Strategy does not appear to be based on the existing spatial hierarchy. Chepstow has a lesser proportion of growth assigned to the settlement compared to Monmouth, Abergavenny and	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. On a strategic level, there is broad alignment between the proposed level of housing and employment	No change required.

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Planning) / Objection	<p>Caldicot. It is not logical or sustainable to assign a lower level of growth to Chepstow, by doing so undermines Chepstow's future sustainability and vibrancy, and does not fully address the key issues within Chepstow. This damages Chepstow's communities needs contrary to the Well Being of Future Generations Act. Strongly of the view a high proportion of growth should be identified at Chepstow that is commensurate with its role and function in the settlement hierarchy.</p>	<p>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). When considered on a north/south basis, the primary settlements in the north of the county (Abergavenny and Monmouth) account for 37% of the county's residential growth and the south (Chepstow and Caldicot including Severnside) account for 49%. This is considered to be acceptable given the south's strong functional links with Newport, Cardiff and Bristol.</p> <p>The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p>	
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	<p>As was the original intention of the PS 2021, the Bayfield Site should be allocated in addition to allow for higher proportion of growth in Chepstow and the tables within the plan updated to reflect this.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth proposed for Chepstow is considered appropriate given its role as a primary settlement, whilst also having regard to its constraints.</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore considered to be appropriate reflecting the balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p> <p>In October 2023, a report of post consultation Preferred Strategy changes was agreed by Council. The change in the strategic site allocation in Chepstow from Bayfield, as shown in the consultation version of the Preferred Strategy, to</p>	No change required.

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		<p>Mounton Road, was one such change. On balance, the Council considered that the benefits of the commercial development and associated job creation at the Mounton Road site outweigh the loss of higher quality agricultural land and encroachment into the existing green wedge separating Chepstow and Pwllmeyric, given the absence of alternative commercial sites and the importance of Chepstow for tourism as the gateway to the Wye Valley.</p>	
<p>1281 / Barratt David Wilson Homes (LRM Planning) / Objection</p>	<p><b>Number of concerns in respect of the components of the housing land supply:</b> the housing strategy is not sufficiently robust or flexible to ensure compliance with PPW; the housing provision does not flow logically from the strategy of the Plan; the housing supply is not realistic and appropriate having considered the evidence; and restricting the level of housing available during the Plan period does not provide a reasonable level of flexibility to allow the Plan to deal with the challenges faces (Q3 point 1.10) and will exacerbate existing problems : undermining economic growth, increasing levels of unaffordability; and reinforcing an ageing population as new households are unable to form.</p>	<p>The proposed RLDP growth figure strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government concluded that the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle.</p> <p>The approach taken to meeting the housing provision figure of 6,210 is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).</p> <p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate. Furthermore, the RLDP has been prepared in accordance with the Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates throughout the Plan period can be achieved.</p>	
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	<b>Concerns on the over reliance upon historic completions</b> that were intended to contribute towards the previous LDP but did not.	The approach taken to meeting the housing provision figure of 6,210 homes is consistent with the advice set out in the Development Plans Manual (March 2020). It is standard practice to factor in completions to date and existing commitments that are considered to be deliverable in the Plan period. For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025).	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Windfalls - we question the appropriateness of including an allowance for the last few years of the Plan. By the time the plan gets to adoption there will only be up to 7 years in total remaining as such we would expect to have a generally good idea of any brownfield sites that may come forward.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Comment	Windfall sites within the urban capacity study most appear to be constrained. Given this believe that 230 is optimistic and suggest this number is halved to 115.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative	No change required.



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		method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has been taken.	
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	Land east of Caldicot/North of Portskewett - note the comments of Richborough Estates in the Housing Background Paper, however, notwithstanding those, we would have major reservations about the assumptions made over the lead in time for delivery: EIA will delay, planning application process will delay, disposal process to a developer, upfront infrastructure requirements will cause delay. Consider that at least 320 dwellings will be delivered in the next plan period (Q3 points 1.24-1.25).	A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of HA2 – Land East of Caldicot East / North of Portskewett can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocation HA2.	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	Land east of Abergavenny - note the comments of lead time in the Housing Background Paper, however, notwithstanding those, we would have major reservations about the assumptions made over the lead in time for delivery: EIA will delay, planning application process will delay time to submit RMs and discharge pre-commencement conditions, upfront infrastructure requirements will cause delay and believe optimistically first completions would appear 2030/31 and 80 units would be realistic maximum per annum. Consider that at least 190 dwelling will be delivered in the next plan period.	A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of HA1 – Land to the East of Abergavenny can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocation HA1.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	Should land at east of Caldicot/north of Portskewett and land east of Abergavenny deliver at the same pace as the current LDP sites then it is likely that the figures outside the plan period will increase.	A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of HA1 – Land to the East of Abergavenny and HA2 – Land East of Caldicot East / North of Portskewett can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocations HA1 and HA2.	No change required.
1281 / Barratt David Wilson Homes (LRM Planning) / Objection	<p>Flexibility allowance - requires a higher flexibility allowance to address problems with land supply (as evidenced with the current LDP) and therefore prudent to plan for a higher buffer. A 20% flexibility buffer would be consistent with Bridgend's approach (where there was a similar level of under delivery in the current LDP). The added issues with Phosphates and delivery of WWTW upgrades means that it is prudent to plan for a higher level of flexibility.</p> <p>Given the highly limited timeframe of the plan, a delay on a handful of sites (for unforeseen reasons) could result in a significant number of dwellings being pushed outside of the plan period. Accordingly, a further 270 dwellings ought to be identified with a total housing provision of 6,480.</p>	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with the Development Plans Manual's (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated. Dwr Cymru's timescale for phosphate mitigation measures has also been factored into delivery timescales.</p>	No change required.
1301 / Melin Homes / Objection	Strongly object - does not adequately address the key challenges faced by rural communities. Disappointed that the most suitable solution (a new settlement) has been deferred for consideration through a	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	No change required.

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	<p>Strategic Development Plan. Such an approach provides the step change required in the County. Concerned that 44% of growth is to be directed towards the M4/Severnside which accommodate around 20% of the population. A new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority (CS0224 Cwm Pentref).</p>	<p>housing affordability, rebalancing our demography and economic prosperity. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy does not, therefore, allow New Settlements to be considered as part of the LDP process.</p> <p>With regards to candidate site CS0224 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment</p>	

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		Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.	
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Support	Support an approach that seeks to address the key challenges faced by rural communities with an appropriate level of growth across the most sustainable lower tier settlements. Our client supports the proposed distribution of development to smaller rural settlements such as Devauden and note that further sites in their control can help contribute to provision.	Support welcomed.	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Objection	Proportion of growth to Caldicot is 35% and significantly higher than any other area - Consider the proposed distribution as drafted could be in conflict with some of the Council's own objectives to sustain rural communities and suggest revisited to find a more balanced distribution. It does also not take into account the physical constraints of the Severnside area.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP's objectives.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Objection	Windfall allowance - question the appropriateness of this. Suggest 230 proportioned is optimistic given the constraints identified in the urban capacity.	For information, the housing figures have been updated to reflect the 2024/25 monitoring period, with consequential changes set out in an updated Housing Background Paper (2025). The windfall allowance now covers the remaining 3.75 years of the Plan and has been reduced to contributing 200 units to the housing supply. This is based on the findings of an updated Housing Potential Study which can be viewed in the updated Housing Background Paper (2025). The alternative method for calculating windfalls is to base it on past trends, which would result in an average annual windfall rate of 80 homes or total of 300 homes. In this respect, a conservative approach to windfall provision has appropriately been taken.	No change required.
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Objection	Flexibility allowance - previous LDP under delivered - prudent to plan for a higher buffer particularly as delays in sites could result in sites being pushed outside of plan period. Note that 20% flexibility allowances would be consistent with the approach of Bridgend where there was a similar level of under delivery in the earlier LDP.	<p>The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances and that the level of flexibility will be for each Local Planning Authority (LPA) to determine based on local issues, with 10% noted as a starting point. A 15% flexibility allowance is considered to be appropriate and justified to increase provision to ensure that the strategic sites at Land to the East of Abergavenny and Land to the East of Caldicot/North of Portskewett are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. It also ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out and enables the provision of a range and choice of sites, ensuring that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop. A range of smaller sites will also ensure the delivery of much needed affordable housing after the adoption of the plan to start addressing this current unmet affordable housing need. In this respect, a 15% flexibility is considered to be appropriate.</p> <p>The RLDP has been prepared in accordance with the Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p>	No change required.
1305 / Monmouthshire Housing	Proportion of growth to Caldicot is 35% and significantly higher than any other area. Unfortunately, this is likely to be at	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Association (MHA) (LRM Planning) / Objection	the expense of a more distributed approach that supports existing communities and delivers the Council’s objectives to build resilient communities and to sustain existing rural communities. We consider the proposed distribution as drafted could be in conflict with some of the Council’s own objectives including sustaining existing rural communities and we would suggest it should be revisited to find a more balanced distribution.	<p>spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP’s objectives.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
1305 / Monmouthshire Housing Association (MHA) (LRM Planning) / Objection	Strategy does not appear to fully appreciate the significant physical constraints which will limit the amount of development which can take place within the Severnside settlements. For instance, constraints to delivery at Caldicot include flooding, the ecological and archaeological sensitivity of the Gwent Levels.	<p>The site selection process has had full regard to development constraints, with full details set out in the candidate site assessment proformas and site submission evidence. The RLDP has been prepared in accordance with the Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of HA2 – Land East of Caldicot East / North of Portskewett can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocation HA2.</p>	No change required.
1305 / Monmouthshire Housing Association	MHA site at Llandogo is likely to contribute as a windfall site as it lies within settlement boundaries and an application is imminent. However, we would question whether this	Comments noted. With regards to CS0101 – Land adjacent to Parklands, Llandogo as noted in the Candidate Site Assessment Report 2024, given the site’s location within the settlement boundary, proposals can be pursued via the planning	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
(MHA) (LRM Planning) / Comment	should be an allocation given the certainty over the proposals.	application system, subject to detailed planning policies. It is not, therefore, considered necessary to allocate the site for residential use in the RLDP.	
1461 / MCC Estates / Support	Support the Plan's overarching strategy in relation to spatial distribution noting it is entirely appropriate and will allow for the delivery of sustainable and resilient communities.	Support welcomed.	No change required.
1467 / Hallam Land Ltd (Boyer Planning) / Support	Support the recognition of Monmouth as a Primary Settlement and agree that it is an appropriate location for future growth and development noting it aligns with the objectives of national planning policy and shall ensure future housing is prioritised in locations which benefit from good connectivity to local services, facilities and transport infrastructure. Supports identification of key site allocations within this locality which are able to be relied upon to contribute to meeting Monmouthshire's housing needs.	Support welcomed.	No change required.
1480 / Edenstone Homes (Boyer Planning) / Support	Support the recognition of Abergavenny as a Primary Settlement and agree it represents one of the most sustainable locations for future development in Monmouthshire. Support the identification of key site allocations within this locality, such as Land at Penlanlas Farm, which are able to be relied upon to contribute to meeting MCC's housing needs.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1493 / Vistry Homes Limited / Objection	Support the overarching principle that growth should be focused on the most sustainable settlements in line with the settlement hierarchy. However, the distribution of development amongst the Primary Settlements does not reflect the findings of the SSA. Chepstow is ranked as the second most sustainable settlement in the county, however, has only 13% of the indicative development compared to 35% at Caldicot. Amount of development proposed in Monmouth and Chepstow does not reflect the sustainability of the settlements or the availability of suitable sites.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is, therefore, a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>With regard to the level of growth proposed in Caldicot, Welsh Government acknowledge the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p>	No change required.
1493 / Vistry Homes Limited / Objection	The spatial strategy is disproportionately reliant on two strategic sites, located at Abergavenny and Caldicot. Together they account for 60% of the proposed allocations and 20% of the overall housing provision. Reliance of two strategic sites risks a similar shortfall occurring to the RLDP as the LDP and vulnerable to delays in the delivery of these sites.	<p>The RLDP spatial strategy is considered to provide a sustainable distribution of growth across the county to addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot North of Portskewett) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a</p>	No change required.



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		<p>report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). This change ensures that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. The increased flexibility allowance has enabled the Plan to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop.</p> <p>Furthermore, the RLDP has been prepared in accordance with the Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of HA1 – Land East of Abergavenny and HA2 – Land East of Caldicot East / North of Portskewett can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocations HA1 and HA2.</p>	
1502 / Hallam Land Ltd (Asbri Planning) / Objection	Details not specified - referred to previous representations at earlier RLDP consultation stages.	For comments to be considered duly made representations they need to be provided during the Deposit consultation period. Responses to comments made in relation to the Preferred Strategy can be found in the Initial Consultation Report (2024).	No change required.
1503 / Redrow Homes (South Wales) Limited / Objection	Endorse the categorisation of Monmouth as a Tier 1 Primary Settlement however state the 923 allocation should be considered as an absolute minimum to ensure the minimum housing needs of this	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales. Spatially, the	No change required.

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	<p>top tier settlement can be achieved during the RLDP period.</p>	<p>growth is considered to be well distributed throughout the County and reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>The level of growth apportioned to Monmouth is considered to be consistent with the findings of the SSA and reflects amendments that were made by Council in October 2023 following consultation on the Preferred Strategy (2022) and the proposed solution to the phosphate issue at the Monmouth wastewater treatment works. Consistent with the October 2023 Council Report and updates to the Preferred Strategy, the Deposit Plan proposes the redistribution of homes from the housing total</p> <p>by reducing the scale of new site allocations in Severnside, including reduction of the Caldicot East strategic site from approximately 925 homes to approximately 770 homes. The Deposit Plan allocates four residential/mixed use sites for Monmouth, which are considered to provide a range and choice of sites for the settlement, although it is recognised that two are LDP rollover sites.</p>	
<p>1503 / Redrow Homes (South Wales) Limited / Objection</p>	<p>Over concentration of Severnside growth to one single site (CENP). Consider housing needs of Severnside would be better met if an additional allocation is made in Caldicot, which would reduce the overreliance on CENP. A second major allocation would provide much needed flexibility to the RLDP.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for</p>	<p>No change required.</p>

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		<p>allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>The Deposit Plan allocates 18 residential/mixed use sites. Whilst it is recognised that two of the strategic sites (HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot / North of Portskewett) account for 1,270 homes, there are a further 16 residential allocations ranging in size from 15 units to 270 units contributing to housing delivery in the County. Furthermore, in October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. An increase in the flexibility rate from 10% to 15% was one of the changes agreed. This increased the housing provision figure from 5,940 (10% flexibility) to 6,210 (15% flexibility). This change ensures that the strategic sites at Abergavenny East and Caldicot East are sufficiently large to deliver the required infrastructure whilst also allowing for the allocation of a range of smaller sites across the County to sustain and enhance existing communities. Increasing the flexibility ensures that the plan is more robust and resilient as there is delivery in the short-term term while the large strategic sites take time to be developed out. The increased flexibility allowance has enabled the Plan to provide a range and choice of sites and ensure that the plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop.</p> <p>Furthermore, the RLDP has been prepared in accordance with the Development Plans Manual’s (March 2020) front loading principle, whereby a significant level of evidence base has been submitted in relation to site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved. Further commentary on the delivery of Land East of Caldicot East North of Portskewett can be found in relation to Appendix 9 of the RLDP and in relation to the specific comments made on allocation HA2.</p>	
<p>1519 / Barratt David Wilson Homes (Savills) / Objection</p>	<p>A greater proportion of new homes should be directed to Penperlleni than either Raglan or Usk given its lack of constraint</p>	<p>The growth levels proposed for the Secondary Settlements, including Penperlleni, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable</p>	<p>No change required.</p>

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	and the proven history of delivery of allocated sites.	<p>pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>With regards to housing growth, all three Secondary Settlements have a proposed residential allocation identified in the RLDP. This is considered to be a more sustainable distribution of growth to help meet the RLDP core objective of facilitating sustainable and resilient communities.</p>	
1519 / Barratt David Wilson Homes (Savills) / Objection	Question the fundamental soundness of a spatial approach which looks to direct a greater number of homes towards the third and fourth tiers of the settlement hierarchy than the second tier of the settlement hierarchy. Given that the spatial strategy is informed by the SSA, the RLDP is directing a higher proportion of new homes to quantifiably less sustainable locations.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements.</p> <p>It is recognised that the secondary settlements accommodate 5% of the overall growth (figures updated to reflect the 2024/25 housing monitoring period) and the rural settlements combined account for 9% of the overall growth. This is, however, a reflection of the proportion of small site infill completions that are anticipated for tiers 3 and 4 of the hierarchy, which is based on a reduced allowance of past trends. This approach is consistent with the advice set out in the Development Plans Manual (Ed 3). In terms of allocations, tier 2 settlements accommodate 6% (136 homes) of the residential allocations across three settlements, over 3 sites and tier 3 settlements, 5% (123 homes) of the residential allocations across five settlements, over 6 sites. Given the geographical scale of Monmouthshire and the number of tier 3 settlements, a number of smaller allocations are considered to be appropriate to distribute an element of growth across the County's most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across the whole of Monmouthshire. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p>	No change required.

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1596 / Monmouthshire Housing Association (MHA) (Boyer Planning) / Support	Agree in principle that new development should be allocated to primary settlements, in order to achieve the aspiration of more demographically balanced rural communities, it is agreed that this can best be achieved through directing growth to the more sustainable rural settlements.	Support welcomed.	No change required.
1596 / Monmouthshire Housing Association (MHA) (Boyer Planning) / Support	MHA support the identification of St Arvans as a Main Rural Settlement capable of accommodating development to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. In particular proposed Allocation HA13 (St Arvans).	Support welcomed.	No change required.
1663 / Richborough / Comment	Refer to Policy S2 and while supportive of the policy in general want the Plan to make it clear that Caldicot, as the Primary Settlement within a wider Severnside cluster will accommodate the majority of new growth in the area. Suggest this would be consistent with the proposed allocation of Caldicot East North of Portskewett which accounts for 770 of the 810 new homes proposed in the Caldicot/Severnside area over the plan period.	The RLDP is considered to be sufficiently clear on the distribution and allocation of growth throughout the County. Chapter 14 sets out detailed tables and site-specific allocation policies, clearly indicating the scale of growth on each site allocation.	No change required.
1663 / Richborough / Objection	Suggest that whilst the Secondary Settlements are set apart from the other rural settlements in the hierarchy this is not always clearly reflected elsewhere in the Plan. Refer to paragraph 6.4.2 as an example noting that this states new development will be focused on the	The RLDP's settlement hierarchy and the settlements associated with each tier is considered to be sufficiently clear from Strategic Policy 2, Table 2 Summary of Spatial Distribution of Housing Provision and the supporting evidence in the Sustainable Settlement Appraisal (SSA). No further clarification is considered necessary.	No change required.

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	<p>Primary Settlements, together with a lower level of growth in the most sustainable lower tier settlements. State it is important that Tier 2 is given due weight when compared to other rural settlements in Tier 3 and Tier 4. Recommend the RLDP refers to the Secondary Settlements separately to the other smaller rural settlements.</p>		
<p>1663 / Richborough / Objection</p>	<p>Refer to indicative percentage of growth in Tier 2 compared to Tier 3 and 4 combined. Note it is appropriate for some growth to be directed to the most sustainable Main and Minor Rural settlements but suggest there should be a clear distinction between the level of growth distributed. Advocate increasing the proportion of growth directed to the Tier 2 settlements, ahead of Tiers 3/4.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements.</p> <p>It is recognised that the secondary settlements accommodate 5% of the overall growth (figures updated to reflect the 2024/25 housing monitoring period) and the rural settlements combined account for 9% of the overall growth. This is, however, a reflection of the proportion of small site infill completions that are anticipated for tiers 3 and 4 of the hierarchy, which is based on a reduced allowance of past trends. This approach is consistent with the advice set out in the Development Plans Manual (Ed 3).</p> <p>In terms of allocations, tier 2 settlements accommodate 6% (136 homes) of the residential allocations across three settlements, over 3 sites and tier 3 settlements, 5% (123 homes) of the residential allocations across five settlements, over 6 sites. Given the geographical scale of Monmouthshire and the number of tier 3 settlements, a number of smaller allocations are considered to be appropriate to distribute an element of growth across the County’s most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across the whole of Monmouthshire. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p>	<p>No change required.</p>

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1663 / Richborough / Objection	Refer to Table 2 and urge an element of caution with regard to the contribution to be made by small sites and windfall sites over the plan period. Suggest over-estimating the contribution from this element will risk new allocations being underestimated. State there is a risk that past rates of delivery will not continue at the same levels over the RLDP plan period, suggest delivery of homes through small sites from year 7 onwards could be ambitious. Note this should be redistributed to Tier 1/2 settlements and could be picked up through increases to existing allocations (where appropriate).	Consistent with the advice in the Development Plans Manual (Ed 3), the small site infill allowance is based on past trends and has been discounted by 15% across all settlements to take account of the plan-led system, phosphate related measures and limited brownfield opportunities in the County. The conservative approach taken to the infill allowance is, therefore, considered appropriate.	No change required.
1683 / Llanarth Estates / Objection	Strongly object - does not adequately address the key challenges faced by rural communities. Disappointed that the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. Such an approach provides the step change required in the County. Concerned that 44% of growth is to be directed towards the M4/Sevenside which accommodate around 20% of the population. A new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority (CS0224 Cwm Pentref).	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Sevenside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.	No change required.

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		<p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.</p> <p>With regards to candidate site CS0224 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan’s Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.</p>	
<p>1692 / Edenstone Homes (Highlight Planning) / Objection</p>	<p>Level of growth in Monmouth is not sufficient or proportionate to the sustainability of the town.</p>	<p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s concerns regarding alignment with Future Wales. Spatially, the growth is considered to be well distributed throughout the County and reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>The level of growth apportioned to Monmouth is considered to be consistent with the findings of the SSA and reflects amendments that were made by Council in October 2023 following consultation on the Preferred Strategy (2022) and the proposed solution to the phosphate issue at the Monmouth wastewater treatment works. Consistent with the October 2023 Council Report and updates to the Preferred Strategy, the Deposit Plan proposes the redistribution of homes from the housing total</p>	<p>No change required.</p>



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		by reducing the scale of new site allocations in Severnside, including reduction of the Caldicot East strategic site from approximately 925 homes to approximately 770 homes. The Deposit Plan allocates four residential/mixed use sites for Monmouth, which are considered to provide a range and choice of sites for the settlement, although it is recognised that two are LDP rollover sites.	
1694 / The Stantonbury Building and Development Company / Objection	Given that Abergavenny is identified as a primary settlement the town should be allocated a greater distribution of residential growth over the plan period, increasing from the current indicative percentage of 22%, commensurate with its position at the top of the settlement hierarchy, being the principal town in Monmouthshire.	<p>Abergavenny’s role as a primary settlement is recognised by the RLDP, particularly with reference to its public transport links by rail and bus and range of services and facilities. The proposed level of growth identified in the RLDP has, however, also had regard to the constraints associated with the town in particular its location adjoining the Bannau Brycheiniog National Park (BBNP) to the north and the floodplain of the River Usk is a constraint on development to the south of the town and in parts of Llanfoist. The RLDP is clear that the strategic allocation on land to the east of Abergavenny represents the intended future direction of growth of development in the Abergavenny area, with its allocation alongside HA5 – Land at Penlanlas Farm, providing an appropriate level of new growth via a combination of a strategic and a smaller site to facilitate delivery within the Plan period.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	No change required.
1736 / Bellway Homes / Support	Support the recognition of Abergavenny (inc Llanfoist) as a Primary Settlement and agree that given the existing level of infrastructure in place it represents one of the most sustainable locations for future development in Monmouthshire.	Support welcomed.	No change required.
1745 / Redi 205 Ltd / Support	<p>It is considered that the settlement hierarchy identified in Policy S2, which seeks to focus new development in the primary settlements of Abergavenny, Chepstow, Monmouth, and Caldicot (including the Severnside Area and</p>	Support welcomed.	No change required.

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	specifically Caerwent), is entirely appropriate and will allow for the delivery of sustainable and resilient communities.		
1948 / Edward Rogers / Objection	Only 9% of new homes have been allocated across 10 rural settlements which makes the Plan unsound given these settlements need new investment in housing to make them sustainable and thriving communities. The benefits of the strategic sites will not benefit smaller settlements. Lack of brownfield lands to deliver sufficient housing. Overlooks the housing affordability issues in smaller settlements which are disproportionately higher	The RLDP's spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth proposed for county's most sustainable lower tier settlements is considered appropriate, offering a balance of providing an element of growth reflecting the settlements' position in the hierarchy whilst also providing some growth to deliver much needed affordable homes and to address rural equality.	No change required.
1965 / Monmouthshire Housing Association (MHA) (GJPlanning) / Support	In principle, MHA support the Plan's Spatial Strategy.	Support welcomed.	No change required.
2280 / Candleston Homes (Savills) / Support	Overall, support a spatial strategy that identifies Abergavenny at the top of the settlement hierarchy and directs a significant proportion of new homes towards it.	Support welcomed.	No change required.
2280 / Candleston Homes (Savills) / Objection	Spatial strategy has directed growth away from Abergavenny towards the Minor and Major Rural Settlements since the Preferred Strategy. Question the fundamental soundness of a spatial strategy which looks to direct a greater	Whilst the percentage of residential growth for Abergavenny reduced from 24% in the Preferred Strategy to 22% in the Deposit Plan this is primarily due to updates in the completions recorded to date, existing commitments and trend-based infill allowances. The level of new allocations proposed for Abergavenny in both the Preferred Strategy and the Deposit Plan has remained the same at 600 homes.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	number of homes towards the third and fourth tier of the settlement hierarchy than the highest tier. Settlement hierarchy is based on the Sustainable Settlement Appraisal. Therefore, the RLDP is directing a higher proportion of new homes to quantifiably less sustainable locations.	The RLDP's spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth proposed for county's most sustainable lower tier settlements is considered appropriate, offering a balance of providing an element of growth reflecting the settlements' position in the hierarchy whilst also providing some growth to deliver much needed affordable homes and to address rural equality.	
2394 / Taylor Wimpey (Savills) / Objection	Although supports growth in the Severnside Region objects that a proportion of growth was taken from Severnside and proportioned to Monmouth in the October 2023 report (due to phosphate constraint resolved) without making up the 375-home reduction in the Severnside area.	<p>The spatial strategy associated with the 2022 Preferred Strategy reflected the phosphate constraint associated with Monmouth at the time. As noted, following Welsh Government's response letter to the 2022 Preferred Strategy advising that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025, the October 2023 Council Report and Preferred Strategy updates, proposed the redistribution of homes from the housing total by reducing the scale of new site allocations in Severnside, including reduction of the Caldicot East strategic site from approximately 925 homes to approximately 770 homes.</p> <p>The RLDP's spatial strategy reflects the findings of the Sustainable Settlement Appraisal, which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, also having regard to deliverability within the Plan period. Caldicot including the Severnside area, account for 35% of residential growth in the County which is considered to be appropriate reflecting its strategic location along the M4 whilst also having regard to the constraints associated with the south of the County.</p>	No change required.
2416 / Edenstone Homes (Highlight Planning) / Objection	Does not accord with Future Wales Policy 12 and Policy 36 as there is no alignment between housing growth and the investment proposed in the Metro at Magor.	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. Moreover, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of growth. In this respect, the spatial strategy and proposed site allocations are considered appropriate.	No change required.

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		<p>More specifically, the RLDP policy framework is considered to be in conformity with policies 12 and 36 of Future Wales. The Sustainable Transport Chapter of the RLDP sets out a number of policies consistent with the aims of polies 12 and 36 of Future Wales including promoting and prioritising the provision of active travel routes and public transport and requiring electric vehicle charging infrastructure as part of developments. Furthermore, Policy ST5 – Transport Schemes, supports and safeguards land for transport schemes identified in the Local Transport Strategy including Metro related schemes such as the Magor Walkway Station. This aims to support sustainable travel in the Magor area, reflecting the level of growth delivered through the Adopted LDP, which allocated a number of sites in the settlement.</p>	
2419 / Edenstone Homes / Support	<p>We support the Council in allocating a level of housing growth to Tier 2 settlements such as Penperlleni. This level of growth is required to contribute to their vitality and attractiveness to retain younger people.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
2463 / Barwood Development Securities Ltd / Support	<p>Support the settlement hierarchy which identifies Chepstow as a Tier 1 Primary Settlement. Whilst it is recognised that Chepstow has a number of constraints to its future growth, Strategic Housing Site HA3 Land at Mounton Road represents a suitable and sustainable area of growth within Chepstow without conflicting with constraints.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
2951 / Tirion Homes / Objection	<p>Strongly object - does not adequately address the key challenges faced by rural communities. Disappointed that the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. Such an approach provides the step change</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed</p>	<p>No change required.</p>

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	<p>required in the County. Concerned that 44% of growth is to be directed towards the M4/Sevenside which accommodate around 20% of the population. A new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority (CS0224 Cwm Pentref).</p>	<p>throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Sevenside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.</p> <p>With regards to candidate site CS0224 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan’s Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.</p>	
<p>2952 / Candleston Homes / Objection</p>	<p>Strongly object - does not adequately address the key challenges faced by rural communities. Disappointed that the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. Such an approach provides the step change required in the County. Concerned that</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire.</p>	<p>No change required.</p>

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	<p>44% of growth is to be directed towards the M4/Sevenside which accommodate around 20% of the population. A new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority (CS0224 Cwm Pentref).</p>	<p>The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Sevenside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.</p> <p>With regards to candidate site CS0224 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan’s Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.</p>	
<p>2954 / Sero / Objection</p>	<p>Strongly object - does not adequately address the key challenges faced by rural communities. Disappointed that the most suitable solution (a new settlement) has been deferred for consideration through a Strategic Development Plan. Such an approach provides the step change required in the County. Concerned that 44% of growth is to be directed towards</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing</p>	<p>No change required.</p>

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	<p>the M4/Severnside which accommodate around 20% of the population. A new settlement should be located close to the strategic highway network in the north of the County in order to address the fundamental challenges of the Authority (CS0224 Cwm Pentref).</p>	<p>growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that "due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority." National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.</p> <p>With regards to candidate site CS0224 – Cwm Pentref, which promotes a new settlement, the site was filtered out at the high-level assessment stage of the candidate site assessment process. As noted in the Candidate Site Assessment Report 2024, the site is not considered to be compatible with the Plan's Strategy or national planning policy which states new settlements should be proposed via a joint LDP, SDP or Future Wales.</p>	
3028 / Coldbrook Estates / Support	<p>Welcome that the Deposit Plan recognises the value of Llanellen as a Main Rural Settlement in accommodating growth proportionately.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
3899 / Mr Paul Smith / Support	<p>Abergavenny settlement boundary is defined is supported in relation to the River Gavenny corridor.</p>	<p>Support welcomed.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1366 / Carney Sweeney Ltd / Support	Welcome the inclusion of Grosmont within Tier 4 of the settlement hierarchy where 'minor infilling between existing buildings will be considered acceptable.	Support welcomed.	No change required.
1366 / Carney Sweeney Ltd / Objection	Agree that it is unnecessary for Tier 4 settlements to have defined settlement boundaries, however the current wording creates some ambiguity over whether a site is already 'within' a Tier 4 settlement or not. Following rewording could address this: 'To be considered as being 'within' Tier 4 settlement, a site must be capable of rounding off the settlement footprint or infilling of a small gap between existing buildings forming part of the settlement without having an unacceptable adverse impact on village form and character and surrounding landscape.'	For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to 'small-scale rounding off' will be added to Policy S2. Further changes to the policy are not considered necessary as Policy H3 and its supporting text provide additional detail on the appropriate scale of development and other considerations.	For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to 'small-scale rounding off' will be added to Policy S2. Further changes to the policy are not considered necessary as Policy H3 and its supporting text provide additional detail on the appropriate scale of development and other considerations.
1383 / Taylor Wimpey (Boyer Planning) / Support	Support the recognition of Monmouth as a Primary Settlement in principle and agree that it is an appropriate location for future growth and development.	Support welcomed.	No change required.
1383 / Taylor Wimpey (Boyer Planning) / Objection	Whilst supportive in principle, question the amount of growth proposed and the allocations which seek to provide it. Suggest the proportion of growth should be increased in Monmouth to match that of Abergavenny as a minimum of 22%/1,362 homes. Fully aware of WG	The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government's concerns regarding alignment with Future Wales. Spatially, the growth is considered to be well distributed throughout the County and reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>concerns and therefore whilst supporting a higher level of growth than proposed consider that those numbers should be redistributed. Suggest CS0078 can be allocated in Monmouth.</p>	<p>settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The level of growth apportioned to Abergavenny compared to Monmouth is considered to be consistent with the findings of the SSA and reflects the sustainable transport options, including a train station, available to Abergavenny.</p> <p>With regards to CS0078 – Land adjacent to Croft y Bwla Farm, the Candidate Site Assessment Report (2024) concludes that the site is not allocated in the Deposit Plan as there is sufficient and more suitable land available for residential development within the primary settlement of Monmouth to accommodate its housing need.</p>	
<p>1029 / Ann Langford / Objection</p>	<p>Policy S2 allocates a disproportionate number of houses to Monmouth. Monmouth has little employment opportunity, therefore development should be skewed heavily in the Severnside area in order to provide more sustainable developments.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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), with Monmouth specifically accommodating 15% and 10% of the proposed housing and employment growth respectively. The Caldicot and Severnside area account for 35% and 65% of the housing and employment growth respectively in recognition of the strong functional links with Newport, Cardiff and Bristol. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflects the site search sequence outlined in national planning policy.</p>	<p>No change required.</p>
<p>1284 / Mr G Alan Horne / Objection</p>	<p>Development must only be allowed if it meets all objectives and eases current issues concerning pollution, congestion and services. An increase in housing and employment should go hand in hand with improvements to roads and services to reduce congestion and meet increased demand.</p>	<p>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. The RLDP sets out the policy framework to ensure that development is delivered as</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>sustainably as possible and in a balanced manner, whilst also addressing the causes of and adapting to, climate change as per the requirements set out in the RLDP.</p> <p>The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. It sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans site allocations.</p>	
1365 / Mr Adrian Lewis / Objection	HA2: as the plan indicates, this will serve mainly travel to the East, i.e. Bristol and will not serve the local community.	<p>A key objective of the Replacement Local Development Plan (RLDP) is to reduce the levels of out-commuting. To address this the RLDP identifies a level of growth that aims to provide an appropriate balance of housing and employment development, to reduce the need to travel and travel to work distances. The growth and spatial strategy set out in Policies S1 and S2, represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p>	No change required.
1410 / Mr Kevin Hall / Objection	Too much in Severnside, we have no infrastructure at all. Caldicot housing site	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>has a great position along the M4 corridor, but we can't get to it, we need roads not more houses. Roads must come first.</p>	<p>based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP’s objectives.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Policy HA2 – Land to the East of Caldicot / North of Portskewett, sets out sustainable travel and highways policy requirements associated with the development. In addition, an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>The Plan’s transport policy framework reflects national policy aspirations, including Welsh Government’s Wales Transport Strategy which prioritises measures that maximise mode shift from the private vehicle off the highway network to measures that promote sustainable travel, which includes prioritising active travel (walking, wheeling, cycling) and public transport use.</p>	
<p>1575 / Ms Janet Horton / Objection</p>	<p>Constraints - a missing constraint. The current road infrastructure is already significantly challenged at several 'choke points' in the Chepstow area. This includes</p>	<p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>the High Beech roundabout and the A48 past Tesco and up Highmoor Hill.</p> <p>All further development in the SE of the county (Chepstow itself and rural settlements such as Devauden and the substantial developments at Caldicot and Caerwent) will make a bad situation much worse. Adequate provision must be made for new access points to the key road infrastructure such as the M4.</p>	<p>Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Regarding Highbeech roundabout, any development affecting this junction must mitigate its traffic generation. Suitable measures must be provided for consideration as part of the planning application process.</p> <p>The Plan’s transport policy framework reflects national policy aspirations, including Welsh Government’s Wales Transport Strategy which prioritises measures that maximise mode shift from the private vehicle off the highway network to measures that promote sustainable travel, which includes prioritising active travel (walking, wheeling, cycling) and public transport use.</p>	
<p>1646 / Mr Brian Williams / Objection</p>	<p>There should not be a Severnside Cluster. Clustering designation has been made to try and diminish the impact of siting 33% of Monmouthshire's new homes in a single 770 house development at Caldicot/Portskewett. The various settlements should be considered in their own right. Overall, 48%+ of new homes will be in the south-eastern corner of the county in prime 'out-commuting' territory. This is over development.</p>	<p>The methodology used for the Sustainable Settlement Appraisal (SSA) is based on the approach set out in the South-East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal (SSA) Paper, with some amendments for local considerations. The methodology reflects the requirements of the Development Plans Manual and provides a basis for regional consistency and is therefore considered to be an acceptable basis for the RLDP settlement hierarchy. In accordance with Planning Policy Wales (PPW), the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for new development, including housing and employment provision. The criteria used for identifying clusters is set out in section 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary Settlement). The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot. This approach is consistent with the methodology and PPW.</p>	<p>No change required.</p>

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		<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
1675 / Dr Mary Barkham / Support	<p>Support the deposit plan in full however has particular support for Green Wedge between Abergavenny and Bannau Brycheiniog National Park, the Green Infrastructure Plans to ensure protection and enhancement of GI in the county and the housing allocation to east of Abergavenny.</p>	Support welcomed.	No change required.
1779 / Mrs Sandra Lloyd / Objection	<p>Housing developments are unsustainable as not mirrored by improvements to infrastructure - points to Caldicot East impact on traffic and exacerbate existing issues and thus transport schemes are needed prior to housing development. S2 clause that planning permission will only be allowed for select list of development contradicts other policies in the RLDP H7,</p>	<p>Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy S2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list. It is therefore</p>	<p>Amend Strategic Policy S2 to read:  Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national</p>

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	<p>E2, S11, RE1, and S15 that allow development in open countryside and needs updating.</p>	<p>proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. In addition, policy ST5 – Transport Schemes of the RLDP seeks to support and safeguard the active travel, public transport and road improvement schemes identified within the Local Transport Strategy (LTS). Further details on this issue can be found elsewhere in this report in reference to policy HA2 – Land to the East of Caldicot / North of Portskewett.</p>	<p>planning policy, subject to satisfying detailed planning criteria.</p>
<p>1813 / Mr Jeremy Callard / Support</p>	<p>Siting residential development on the Eastern Abergavenny proposal is my preferred option.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
<p>1939 / Mr Matthew Hayes / Objection</p>	<p>Development proposed for Raglan disproportionate to the size of the village.</p>	<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>With regards to housing growth, all three Secondary Settlements have a proposed residential allocation identified in the RLDP. It is recognised that Raglan accommodates the employment growth for the Tier Two Secondary Settlements, however, this reflects its strategic location in the County positioned centrally between Abergavenny and Monmouth and with good links to the A40 and the A449, linking north towards Monmouth and Hereford and south towards Newport, Cardiff and Bristol, hence the promotion of such uses via the candidate site process.</p>	<p>No change required.</p>

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1944 / John Burrows / Objection	<p>Object to Policy S2 as it sets too high a target for housing in rural areas. The number would be out of scale and out of development shape for those villages. There are no village plans for the larger villages explaining how and why extensions to such villages can be achieved. New housing is not best located in the villages and the target set out in the RLDP should be substantially reduced. Some villages may be not able to accommodate new development in terms of facilities, road infrastructure therefore congestion issues.</p> <p>Delete the 550 houses 'target' for the Rural Settlements. A figure of about 150 houses for the Rural Settlements (to be achieved by small scale developments) might be more appropriate and add the balance of 400 to the larger urban areas and Severnside where they would be better served, and in scale with those developments.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements.</p> <p>With regards to the proposed growth levels of the rural settlements, this represents 9% of the overall growth. This is, however, a reflection of the proportion of small site infill completions (e.g. barn conversions, single dwellings) that are anticipated for tiers 3 and 4 of the hierarchy, which is based on a reduced allowance of past trends. This approach is consistent with the advice set out in the Development Plans Manual (Ed 3). In terms of allocations, tier 3 settlements account for 5% (123 homes) of the residential allocations across five settlements, over six sites. Given the geographical scale of Monmouthshire and the number of tier 3 settlements, a number of smaller allocations are considered to be appropriate to distribute an element of growth across the County's most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across the whole of Monmouthshire. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p>	No change required.
2324 / Mrs Susan Sandford / Objection	<p>Chepstow is not a sustainable settlement. Traffic pollution, a lack of investment, the impact of new housing developments in Gloucestershire, absence of sustainable transport network.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National</p>	No change required.

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		<p>Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore considered to be appropriate reflecting the balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p> <p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	
2616 / Mrs Sarah Turner / Objection	The Severnside area is oversubscribed and this plan has too high a proportion in the Severnside area and Chepstow. Road infrastructure is unable to cope.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p>	No change required.



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		<p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	
2739 / Janine Amos / Objection	Building on green land, where there is insufficient public transport, cannot be considered to be responding to the Climate and Nature Emergency.	<p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	No change required.
2779 / Mrs Kaely Backland / Objection	Objects to new definition allowing "infill between existing buildings" in tier 4 settlements with no appraisal being conducted recently, with the last one being in 2010. Believes this phrasing will increase number of "existing buildings" in Minor Villages through this change in definition, increasing likelihood of significant residential development pressures and conflict with MCC Landscape Sensitivity and Capacity Study: Main Villages and H4 Settlements (2010).	<p>The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value</p>	Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The relevant part of the policy will now read: “Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW. The policy seeks to avoid encroachment into the open countryside, restricting development to the physical form of the settlement, but recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	<p>existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.”</p>
<p>2839 / Paul Doyle / Objection</p>	<p>Objector feels the policy conflicts with Polices S3, PM1, PM2, S4, S6, S8 and Objectives 8, 11, 14, 15 and 17.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward. Policy HA3 – Land at Mounon Road, Chepstow safeguards land for potential future improvements to the Highbeech roundabout.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	
2885 / Mr Jeffrey Parfitt / Objection	Tier 2 are tiny communities that are already over-subscribed. More people do not equal stronger sustainability when there is clear evidence of declining investment.	The growth levels proposed for the Secondary Settlements has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.	No change required.
2942 / Mrs Nicola Johnson / Objection	Cease all developments in Severnside.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>The spatial distribution of growth in the south of the County is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.	
2947 / Mr R Lewis / Objection	Policy S2 designates Usk a Secondary Settlement implying it is suitable for development, but it is not due to the unique environmental constraints of Site HA11.	<p>The growth levels proposed for the Secondary Settlements, including Usk, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>Further detailed comments on allocation HA11 – Land East of Burrium Gate, Usk are set out elsewhere in the report.</p>	No change required.
2973 / Matt Gill / Objection	Unfortunately, this is too late for Magor and Undy as the last ill-informed LDP has already destroyed the community. There is no more in this proposal as all the green/healthy space has gone sadly.	The Replacement Local Development Plan (RLDP) allocates Areas of Amenity Importance and protects them from future development under Policy CI4. These are identified on the Proposals Map and includes a number of areas within the Magor and Undy settlements.	No change required.
3075 / Mr David Neal / Objection	Concerns that any developments will affect traffic and congestion.	The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Further details on transport related issues can be found elsewhere in this report in relation to Sustainable Transport chapter of the RLDP.	No change required.
3079 / Mr Andy Hughes / Objection	I am objecting to any more homes being built in or around Chepstow. The town is already at capacity. The roads are gridlocked much of the day, not just peak times. Six week waits for a GP appointment. School class sizes too large. People want to move to Chepstow because	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	it's a lovely place but it's being ruined through over development.	<p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p> <p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers. In terms of health infrastructure such as dentists and doctors in the locality, the mechanisms for improved health infrastructure sit outside of the planning process, the Council nevertheless is fully engaged with the health board to help deliver service improvement across the County as a whole.</p>	
3215 / Jonathan (Jonty) Pearce / Objection	Chepstow is not getting its fair share of housing.	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>settlements of Abergavenny, Chepstow, Monmouth and Caldicot (including the Severnside area).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p>	
3319 / Nr A Andrew Hubert von Stauffer / Objection	The entire plan is simply based on government objectives that have been made totally obsolete by a very energetic climate that has no stability.	Planning Policy Wales notes that development plans at all levels must be prepared in accordance with national planning policies and Local Development Plans must be in general conformity with Strategic Development Plans (where prepared) and Future Wales, the national development framework. Conformity with national policies is a key test of soundness that the RLDP is tested against. In this respect, the RLDP has been prepared with regard to national policies, but with locally specific policies to 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.	No change required.
3320 / Mr Aaron O’Shea / Objection	More green space is needed, not grey.	Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and for recreation and, therefore, helps ensure the provision of public open space and recreation facilities are protected by designating Areas of Amenity Importance as well as requiring new development to contribute to the provision of additional/improved facilities.</p>	
3323 / Mrs Angela Harries / Objection	<p>Would like to see more detailed plans on flood management, the fields backing onto this site and Caldicot Castle grounds are currently underwater, so will this be alleviated.</p>	<p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDs) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Further detailed comments on the flood risk management and mitigation in relation to Policy HA2 – Land to the East of Caldicot/North of Portskewett, are provided in the responses to Policy HA2.</p>	No change required.
3327 / Miss Bethan Jones / Objection	<p>Object to sites in Monmouth due to flooding.</p>	<p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDs)</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Further detailed comments on the flood risk management and mitigation in relation to the site allocations proposed in Monmouth are provided in the responses to the specific sites and can be viewed elsewhere in this report.</p>	
3337 / Mrs Cathy Geary / Objection	<p>There has been too many houses built in the last 20 years around Caldicot/Chepstow. The infrastructure cannot cope - schools/doctor surgeries/roads.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%.</p> <p>This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		allocated sites, having regard to information provided by the relevant infrastructure providers.	
3359 / Mr Dai Burgum / Objection	Instead of spreading the full load between about 4 sites and straining already stretched services, build one new town to include the required modern infrastructure.	With regards to the consideration of a new settlement, paragraph 3.53 of Planning Policy Wales states that “due to their strategic nature new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. This is due to their significance and impacts extending beyond a single local authority.” National Policy, therefore, does not allow New Settlements to be considered as part of the LDP process.	No change required.
3360 / Mr Daniel Thomas / Objection	Too many houses already.	The preparation of a Local Development Plan is a statutory requirement of the Council. The growth level set out in Policy S1, represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle. The Growth Strategy also meets the key ‘Tests of Soundness’ of ensuring that the Plan is locally specific, addresses key issues, is supported by robust, proportionate and credible evidence, and ensuring that the Plan’s Vision and Strategy are positive and sufficiently aspirational.	No change required.
3368 / Keith Poultney / Comment	Disproportionate amount of development in the Severnside area. A more appropriate distribution of housing and employment would be beneficial. Smaller hamlets could be expanded to support schools and shops and to reduce commuting and carbon footprint.	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government’s response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>The spatial strategy also includes a small-scale growth to the County's most sustainable rural settlements to deliver much needed affordable homes, address rural inequality and help sustain rural communities as per RLDP Objective 13.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
3370 / Ms Deborah Hayler / Objection	There is not sufficient infrastructure, roads, schools or healthcare to sustain any additional housing. It is at capacity, basic services are no longer available for the people who currently live here. Congestion is a daily dangerous occurrence. Please put residents over continuous greed.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3371 / Andrew Clark / Objection	Does not recognise the term 'Severnside Area' which does not appear on OS mapping nor been consulted upon; believes it has been used to make the proposals look more reasonable. Wants the plan changed to reflect the true nature of the area and provide details for each of the towns and villages as per other areas of the county. This would show the majority of proposed development, in the area, would fall adjacent to Portskewett, which is unreasonable.	The methodology used for the Sustainable Settlement Appraisal (SSA) is based on the approach set out in the draft South-East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal (SSA) Paper, with some amendments for local considerations. The methodology reflects the requirements of the Development Plans Manual and provides a basis for regional consistency and is therefore considered to be an acceptable basis for the RLDP settlement hierarchy. In accordance with Planning Policy Wales (PPW), the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for new development including housing and employment provision. The criteria used for identifying clusters is set out in section 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary Settlement). The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot. This	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>approach is consistent with the methodology and PPW.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
3377 / Mrs Edmunds / Objection	Need better transport services, need better road system.	The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals. Further details on transport related issues can be found elsewhere in this report in relation to Sustainable Transport chapter of the RLDP.	No change required.
3380 / Miss Emily Gwilliam / Objection	Building more houses is going to be damaging for Monmouth. The current infrastructure does not support the 1000’s more people who will need schools, supermarkets, Doctor surgeries, petrol stations and sufficient road network. Access the dual carriageway from the Dixon Rd is dangerous. The damage to the environment would be dire. Current flooding issues in the town, with surface	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address the Plan’s core issues across Monmouthshire.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>run off would worsen. Emissions, light pollution and disturbance of land will be damaging for conservation and many animals will suffer as a consequence. Increased emissions from 1000's more cars will impact on people's wellbeing and contribute to disease.</p>	<p>The level of growth apportioned to Monmouth is considered to be consistent with the findings of the SSA and reflects amendments to the Preferred Strategy that were made by Council in October 2023 following consultation on the Preferred Strategy (2022) and the proposed solution to the phosphate issue at the Monmouth wastewater treatment works. This approach is consistent with Welsh Government's response letter to the 2022 Preferred Strategy advising that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.</p> <p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p>	
<p>3390 / Mr Craig / Objection</p>	<p>Where it is already over developed, pollution is already massive, congestion is really bad, there is not enough dentists or doctors. The fact there is unlet offices in the area shows your shortsightedness and lack of research.</p>	<p>As no site reference is given it is unclear which site the comments relate to, however on a strategic level, the growth level and spatial strategy set out in Policy S1 and S2, represent a sustainable level and distribution of growth that address our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle or the spatial strategy.</p> <p>With regards to infrastructure provision, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		provided by the relevant infrastructure providers. The mechanisms for improved health infrastructure sit outside of the planning process, however, the Council is fully engaged with the health board (ABUHB) to deliver health care service improvements across the County.	
3405 / Mrs Helen Taylor / Objection	They want the plan to be abandoned.	The preparation of a Local Development Plan is a statutory requirement of the Council. The RLDP's growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.	No change required.
3407 / Mr Ian Glen / Objection	Concerns Monmouth has no space for expansion without taking up flood plain and its rivers at an increased risk of flooding due to climate change. Concerns re lack of infrastructure for increased growth in retail and commercial sectors, road capacity for commuting and capacity in schools. The area has a lack of environmental protection. Previous developments have added to these problems and mitigation for these issues has been unsuccessful or not delivered. Concerns ecosystems are dying from polluted rivers and overflowing sewage.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address the Plan's core issues across Monmouthshire.</p> <p>The level of growth apportioned to Monmouth is considered to be consistent with the findings of the SSA and reflects amendments that were made by Council in October 2023 following consultation on the Preferred Strategy (2022) and the proposed solution to the phosphate issue at the Monmouth wastewater treatment works. This approach is consistent with Welsh Government's response letter to the 2022 Preferred Strategy advising that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW's planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.</p> <p>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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Further detailed comments on the flood risk management and mitigation in relation to the site allocations proposed in Monmouth are provided in the responses to the specific sites and can be viewed elsewhere in this report.</p>	
<p>3436 / Mr Christopher Banner / Objection</p>	<p>No infrastructure in Chepstow for building these estates at present. So do something about this.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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).</p> <p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	
3439 / Dr Joshua Thomas-Parr / Objection	Building close to flood plains and too far from existing settlements.	<p>The approach to site selection for the Deposit Plan has followed the site search sequence outlined in planning policy, which prioritises sites within or adjoining existing settlements to build on existing connections. The incorporation of placemaking principles to help create sustainable communities is a key objective of the Plan, with the policy framework to support this. Strategic Policy S3 – Sustainable Placemaking &amp; High Quality Design, being of particular relevance.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3439 / Dr Joshua Thomas-Parr / Objection	The houses are too sporadically spaced.	As no site reference is given it is unclear which site the comments relate to, and it is, therefore, not possible to provide a response.	No change required.
3442 / Mr Gareth Yates / Objection	Land is green field, and on the edge of an existing flood plain. Development will increase surface run off and flood the area. Sewage and storm water connections are not sufficient as it is.	<p>As no site reference is given it is unclear which site the comments relate to, and it is, therefore, not possible to provide a response. However, on a general level, land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p>	No change required.
3444 / Mr Graham Parker / Objection	Large developments are being planned in areas that have flooding, environmental pollution, congested roads, lack of local employment, and poor infrastructure.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Spatially, the growth is considered to be well distributed throughout the County to help address the Plan's core issues across Monmouthshire.</p> <p>The issues raised have been considered as part of the site selection process and detailed in the RLDP evidence base.</p>	No change required.
3492 / Claire Richards / Objection	Concern that the largest distribution of growth is in Severnside. The last LDP delivered a huge housing programme within Magor/Undy with no improvement to the road network. The strategic site at Caldicot/Portskewett will generate a	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in	<p>Amend Strategic Policy S2 to read:</p> <p>Outside of Tiers 1 – 4, open countryside policies will apply</p>



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>substantial amount of traffic, much of which will use the B4245 through Magor/Undy to access J23A of the M4. The transport schemes in policy ST5 must be delivered before this site is occupied. A delivery plan is required. There is conflict within policy S2 between the definitive list of allowed development in the open countryside and policies H7, E2, S11, RE1, S15, which allow development in the open countryside, that is not listed in policy S2. Policy S2 should be updated to include these.</p>	<p>these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p> <p>Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlements and should include criteria-based policies in the development plan to consider such proposals when they are outside the settlement boundaries to ensure that there are no unacceptable impacts. These are referenced throughout PPW and include some of the types of developments listed in Strategic Policy S2. However, as noted, the list in Strategic Policy S2 is not exhaustive and it is therefore considered more appropriate to refer to national planning policy within S2 rather than try and provide a definitive list. It is therefore proposed to reword Strategic Policy S2 to read: Outside of Tiers 1 – 4, open countryside policies will apply where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>	<p>where planning permission will only be allowed where justified in national planning policy, subject to satisfying detailed planning criteria.</p>
3493 / Mrs Julie Carr / Objection	<p>Usk: flood risk for existing properties.</p>	<p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDs) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Further detailed comments on the flood risk management and mitigation in relation to Policy HA11 – Land East of Burrium Gate, Usk are provided in the responses to Policy HA11.</p>	
3514 / Mr Martyn Brown / Objection	The excessive revenue spends on cycling are objectionable.	Revenue spend on cycling is beyond the scope of the RLDP. However, in accordance with national planning policy, the promotion and provision of active travel (walking, wheeling and cycling) routes is a key objective of the Plan.	No change required.
3534 / Ms Yvonne Lampert / Objection	Object to building hundreds of houses, reducing the area to concrete jungle.	The preparation of a Local Development Plan is a statutory requirement of the Council. The RLDP's growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.	No change required.
3537 / Mr Lee C / Objection	Against the proposed plans in Caldicot. Local families and younger generations unable to afford to stay in the area. The road network is a joke. The lack of affordable and accessible dentists/doctors/pharmacists. The small-town feel, and community has disappeared.	<p>The RLDP's growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>Policy HA2 – Land to the East of Caldicot / North of Portskewett, sets out sustainable travel and highways policy requirements associated with the development. In addition, an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The delivery of affordable housing is a key national priority and also a key objective for the Council and is appropriately reflected in the RLDP's vision, objectives and policy framework. Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area.</p> <p>Further detailed comments in relation to Policy HA2 – Land to the East of Caldicot/North of Portskewett, are provided in the responses to Policy HA2.</p>	
3543 / Mr Paul Dalton / Objection	Concerned that Crick and Caerwent are captured under primary settlement as it can lead to over development in those areas.	<p>The methodology used for the Sustainable Settlement Appraisal (SSA) is based on the approach set out in the draft South-East Wales Strategic Planning (SEWSPG) Pathfinder Group Sustainable Settlement Appraisal (SSA) Paper, with some amendments for local considerations. The methodology has regard to the Development Plans Manual and provides a basis for regional consistency and is therefore considered to be an acceptable basis for the RLDP settlement hierarchy. In accordance with Planning Policy Wales (PPW), the methodology allows for clusters of smaller settlements where a sustainable functional linkage can be demonstrated, to be designated as the preferred locations for most new development including housing and employment provision. The criteria used for identifying clusters is set out in section 4 and 10 of the SSA. The cluster analysis recognises that some of the lower tier settlements have a strong geographical and functional relationship with a Tier 1 (Primary Settlement). The settlements along the M4 corridor in particular exhibit strong geographical and functional relationships and have formed a cluster linked to the primary (tier 1) settlement of Caldicot. This approach is consistent with the methodology and PPW.</p> <p>Each settlement within the cluster has its own settlement boundary to help define the extent of the built form associated with each settlement. The RLDP also includes an extensive policy framework to ensure any proposals are appropriate in scale and form for the location they are situated in.</p>	No change required.
3547 / Mr Jon Palmer / Objection	Concerns the homes for sale in South Monmouthshire are not affordable and building more homes will not alleviate this issue. Suggests if housing is really needed	The RLDP's growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth,	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>that Gwent/ Newport areas are more suited to development as they have better transport links, giving time to improve Monmouthshire's infrastructure.</p>	<p>rebalancing our demography, while responding to the climate and nature emergency.</p> <p>The affordability issues in the County are fully recognised in the Plan. In response to this key issue, the delivery of affordable homes is a key objective of the Plan, reflected in the 50% affordable housing policy requirement.</p>	
<p>3550 / Mrs Amanda Graham / Objection</p>	<p>Pause all development in Caldicot, Portskewett, Rogiet, Magor and Undy. It has been out of control for years with resulting overcrowded roads, lack of facilities and loss of green space.</p>	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and jobs potential. The RLDP recognises the value and importance of placemaking and the provision of locally accessible open/spaces for health and well-being and for recreation and, therefore, helps ensure the provision of public open space and recreation facilities are protected by designating Areas of Amenity Importance as well as requiring new development to contribute to the provision of additional/improved facilities.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	
3568 / Mrs Anne Moss / Objection	I would like the RLDP to fully reflect known infrastructure problems and their urgent solution before any locations are proposed that would worsen the problems. For example we have been waiting for over 20 years for an upgrade to High Beech Roundabout in Chepstow. It is totally unacceptable to propose new developments that would make such known problems even worse.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p> <p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	No change required.
3570 / Mr Anthony John Hall / Objection	"Spatial Strategy"??? Cancel all such vague and pointless "plans" that can only be dreamt up to generate "work" for domineering bureaucrats.	The preparation of a Local Development Plan is a statutory requirement of the Council. The growth and spatial strategy set out in the RLDP represents a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.	No change required.
3603 / Mr Darren / Objection	Worst possible location (had), where the worst congestion in the area already exists.	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Whilst Chepstow is recognised as a primary settlement, future growth of the town is however, constrained due to a range of local and national environmental and heritage designations including its location bordering the Wye Valley National Landscape (AONB) to the north, the River Wye to the east and green wedge protection to the west, and south of the A48, the undeveloped land is within a conservation area and, in part, within a designated historic park and garden. The level of growth proposed is therefore a balance between the findings of the SSA and other constraints associated with the settlement.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth, and overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate.</p> <p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward.</p>	
3609 / Mr David Hawkins / Comment	As with S1 supports spread of housing but concerned about the lack of joined-up planning on infrastructure and facilities.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3609 / Mr David Hawkins / Objection	Better to build on a field and implement some sensible transport management and infrastructure solutions than build on the edge of a busy town just because its already there.	<p>The approach to site selection for the Deposit Plan has followed the site search sequence outlined in planning policy, which prioritises sites within or adjoining existing settlements to build on existing connections. The incorporation of placemaking principles to help create sustainable communities is a key objective of the Plan, with the policy framework to support this.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	
3613 / Dr Rebecca / Objection	As previously stated, the plan is in the most unsuitable location (Land East of Abergavenny). Destroying the natural beauty of the area and effectively isolating those who would live there.	<p>The proposed allocation on Land to the East of Abergavenny (HA1) is considered to be a sustainably located edge of settlement site, within close proximity to the Abergavenny train station. The integration of the site with the existing settlement is a key principle in the site's development and identifying connection links that provide crossings across the railway line and the A465 is a key focus for the site.</p> <p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth. Policy NR1 – Nature Recovery and Geodiversity is of particular relevance to the concerns raised. In addition, proposals will be required to satisfy national planning policy on maintaining and enhancing biodiversity as set out in Planning Policy Wales including the step wise approach to avoiding harm and delivery of net benefit for biodiversity.</p>	No change required.
3615 / Mrs Elaine Moore / Objection	Within Shirenewton / Mynyddbach there are several existing approved planning applications. Have these been included? Given historic approvals these should meet the overall objectives of the plan and therefore the contribution of the settlement.	The permission relating to the Adopted Local Development Plan allocation (SAH11(xiv)(a)) on land to the south of Minor Road has been factored into the housing supply figures as an existing commitment. Permissions relating to proposals of less than 10 units are also factored into the housing figures, with an allowance made for infill developments, based on past trends. These get deducted off the overall housing provision figure to inform the overall number of homes to be provided for via new allocations across the County.	No change required.
3632 / Mr George RV	Object to the distribution and level of housing growth proposed in S2 for Primary	The growth level set out in Policy S1 strikes a compromise between achieving our local evidenced-based objectives that underpin the RLDP and the Welsh	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
<p>Ashworth / Objection</p>	<p>Settlements such as Abergavenny, Chepstow and Monmouth and Secondary Settlements resulting from the excessive housing target and flexibility allowance in Policy S1. Object to reference to 'where growth cannot be met in an individual settlement development will be directed toward a same tier or higher tier settlement within the same Housing Market Area. This could result in growth being redirected to Raglan if other settlements have difficulty accommodating their apportionment.</p>	<p>Government’s objection to the level of growth proposed in the 2021 Preferred Strategy. This level of growth has been informed by a wide range of evidence and responds to a number of challenges that have arisen throughout the plan making process including the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. Welsh Government formally responded to the 2022 Preferred Strategy consultation in January 2023, and again in response to the Deposit Plan, with a ‘green’ rating and noting that “Future Wales places great emphasis on the development of National Growth Areas and the need for additional affordable housing. The Draft Plan is in general conformity with Policies 1, 7 and 33 of Future Wales and does not undermine the role of Cardiff, Newport and the Valleys as the main focus for growth and investment in the south-east region, but reflects the urgent need to increase the supply of affordable housing in Monmouthshire.”</p> <p>In this respect, the level of growth proposed has been deemed to be in conformity with Future Wales by Welsh Government. The Deposit Plan is therefore considered to represent a sustainable level of growth that addresses our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency and having regard to Welsh Government’s previous concerns regarding alignment with Future Wales.</p> <p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The growth levels proposed for the Secondary Settlements, including Raglan, has been informed by the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth, with site allocations made in accordance with this. The level of growth proposed is considered appropriate to help sustain such settlements and deliver much needed affordable homes.</p> <p>The Deposit Plan sets out detailed allocations to meet the growth level set out in S1. Reference to development being directed towards a same tier or higher tier settlement within the same Housing Market Area reflects the site selection process that has taken place to reach the Deposit stage and is considered to be appropriate approach to take to site selection.</p>	
3632 / Mr George RV Ashworth / Objection	The Settlement Hierarchy is said in paragraph 6.4.3 to reflect the findings of the Sustainable Settlement Appraisal, but no such appraisal was undertaken for Tier 4 settlements.	The Sustainability Settlement Appraisal covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council’s website at the time of the Deposit RLDP consultation was corrupt, so these settlements did not show properly. This matter has now been rectified, and the document is available to view on the Council’s website. The SSA, including the Tier 4 settlements were, however, considered in formulating the settlement hierarchy set out in Policy S2.	No change required.
3632 / Mr George RV Ashworth / Objection	Object to Policy S2 changing the definition of minor infilling in Tier 4 Minor Villages from that contained in the current LDP, which refers to gaps between existing dwellings rather than between existing buildings. This will create more infilling opportunities in Minor Villages. This would be contrary to the Minor Village status which reflects their unsustainability in terms of their lack of public transport, facilities and infrastructure.	<p>The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes</p>	Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The relevant part of the policy will now read: “Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW. The policy seeks to avoid encroachment into the open countryside, restricting development to the physical form of the settlement, and recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	<p>detailed policy considerations set out in the RLDP.”</p>
<p>3634 / Dr Greg Palka / Objection</p>	<p>Development would increase emissions and diminish green space, contradicts established tenets of Green Infrastructure, Sustainable Design, and Climate Resilience espoused by local and national policies. Reduce the available carbon sequestering capacity around a very busy roundabout (Highbeech). Council's decision appears to diverge significantly from the eco-conscious environmental Welsh and UK-wide policies. Therefore, I implore the Council to re-evaluate its stance through: A rigorous meta-analysis of recent pollution data using credible scientific methods. An independent simulation study to foresee the impact of the proposed housing estate. This analysis should include a thorough Traffic Impact Analysis and a noise and light pollution impact analysis should also be included. A comprehensive Environmental Impact Assessment (EIA). Independent legal analysis to clarify how the proposed</p>	<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>Detailed comments on allocation HA3 – Land at Mounton Road, Chepstow are set out elsewhere in this report.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	controversial development complies with local, national, and international environmental laws and regulations. A detailed review of alternative development sites which would help to increase rather than reduce the carbon sequestering capacity in the area and have a lesser environmental impact. A comparative analysis of alternative sites, including their EIAs. Following this, an extensive Public Consultation is imperative.		
3643 / Daniel Moore / Objection	Within Shirenewton / Mynyddbach there are several existing approved planning applications. It is not clear whether these have been included. Given historic approvals these should meet the overall objectives of the plan and therefore the contribution of the settlement.	The permission relating to the Adopted Local Development Plan allocation (SAH11(xiv)(a) on land to the south of Minor Road has been factored into the housing supply figures as an existing commitment. Permissions relating to proposals of less than 10 units are also factored into the housing figures with an allowance made for infill developments, based on past trends. These get deducted off the overall housing provision figure to inform the overall number of homes to be provided for via new allocations across the County.	No change required.
3702 / Keith Plow / Objection	Requests a well prepared invite/meeting to discuss these things.	A six-week consultation period was undertaken on the Deposit RLDP, which included drop-in sessions across the County, on-line virtual sessions and website information. Following the consideration of the comments received, a report will be taken to Full Council seeking approval to submit the Plan to Welsh Government for an Independent Examination in Public. Objectors to the RLDP, will have an opportunity to contribute to the Examination.	No change required.
3717 / Mr Jack Laphorn-Graham / Objection	Roads are already too busy and in need of relief. These houses will exacerbate this problem.	The traffic implications of the Replacement Local Development Plan's allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.  Further details on site specific traffic implications can be viewed elsewhere in this report in relation to each allocation.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3736 / Mr Hugh Taylor / Objection	Without the necessary infrastructure development should not be contemplated in Chepstow.	<p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward. Policy HA3 – Land at Mounon Road, Chepstow safeguards land for potential future improvements to the Highbeech roundabout.</p> <p>The traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p> <p>With regards to the provision of infrastructure, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP, which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites.</p>	No change required.
3739 / Mrs Heather Burns / Objection	Need to have sufficient infrastructure in place.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3745 / Mrs Jenny Carpenter / Objection	The main development sites appear to be in relevant places but the smaller settlement sites simply seem to be adding small developments to all other villages and towns whether they are appropriate or not just to fulfil the proposals.	Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP’s objectives. This has been done in accordance with the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>informed where development should be spatially located to achieve a sustainable pattern of growth.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
3753 / Mr John Sully / Objection	Detailed evidence to show that the Llanfoist treatment works can handle the extra load of 600 new houses and what the impact that additional housing at Little Mill will have on Berthin Brook.	<p>The Council has engaged with Dwr Cymru Welsh Water (DCWW) throughout the preparation of the Replacement Local Development Plan. With regards to the 500 homes allocated under Policy HA1 – Land to the East of Abergavenny and 100 homes proposed under HA5 – Land Penlanlas, DCWW has advised that a hydraulic modelling assessment is required at the planning application stage to determine the extent of any necessary water infrastructure upgrades.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3789 / Mrs Kirsty Jones / Objection	Objection to the full plan. Monmouth does not have enough infrastructure to support more homes. Not enough doctors, medical care, social care, schools, dentists, parking etc. Monmouth is in a flood area, homes have already been built on flood plains in the area causing numerous flooding issues. There simply is not any capacity for more homes in Monmouth.	<p>The level of growth apportioned to Monmouth is considered to be consistent with the findings of the Sustainable Settlement Appraisal (SSA), which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It also reflects amendments that were made by Council in October 2023 following consultation on the Preferred Strategy (2022) and the proposed solution to the phosphate issue at the Monmouth wastewater treatment works. This approach is consistent with Welsh Government’s response letter to the 2022 Preferred Strategy advising that new site allocations should be made in Monmouth on the basis that sufficient certainty is provided by DCWW’s planned improvements at the Monmouth Wastewater Treatment Works by 31st March 2025.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text. Further detailed comments on the flood risk management and mitigation in relation to site allocations in Monmouth can be viewed elsewhere in this report under each specific allocation.</p>	
3794 / Mrs Lisa / Objection	No facilities and too much traffic for village to cope with as well as flooding and water issues.	<p>As no site reference is given it is unclear which site the comments relate to, however on a strategic level, the growth level and spatial strategy set out in Policy S1 and S2, represent a sustainable level and distribution of growth that address our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency. In response to the Deposit consultation, Welsh Government has concluded the proposed level of growth is in general conformity with Future Wales and has not raised an objection to this level in principle or the spatial strategy.</p> <p>With regards to infrastructure provision, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3811 / Mr Marc Sugrue / Objection	The scale of the Portskewett/Caldicot will have a huge impact on the local area and strip large portions of green belt land from the region. The scale of the	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>Portskewett/Caldicot side is massively higher than that seen in other regions</p>	<p>response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”.</p> <p>Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP’s objectives.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	
<p>3836 / Steve Hoselitz / Objection</p>	<p>Object to the new definition of allowing 'infill between existing buildings' in tier 4 settlements such as Gwehelog.</p>	<p>The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity (paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW. The policy seeks to avoid encroachment into the open countryside, restricting development to</p>	<p>Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The relevant part of the policy will now read: “Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.”</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>the physical form of the settlement, but recognises that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	
3849 / Mr Matthew Jenkins / Objection	Object to green belt land that you are going to take by compulsory purchase of farmland.	<p>The South-East Wales Regional Strategic Diagram (page 163 of Future Wales) provides an indicative plan of the area for consideration as green belt, with the detailed boundary to be defined through the preparation of a Strategic Development Plan (SDP). While the County’s main towns are situated outside of Future Wales’ indicative green belt, in assessing candidate sites and their relationship to Policy 34 of Future Wales, consideration has been given to PPW which states that when considering a Green Belt designation, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this. Potential Green Belt land is to be assessed and designated as part of a Strategic Development Plan (SDP) for the South-East Wales Region.</p> <p>The land allocated within the Deposit Plan has been put forward by landowners for consideration as part of the candidate site selection process.</p>	No change required.
3867 / Mr /Mrs White / Objection	More consideration should be given to the rural nature of the local which was never meant to cope with such an excess of traffic and high population density and therefore has not the infrastructure be it space, utilities, doctors, schools etc.	In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.	No change required.
3870 / Mr Klinkert / Objection	Don’t build.	The preparation of a Local Development Plan is a statutory requirement of the Council. The RLDP’s growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		growth, rebalancing our demography, while responding to the climate and nature emergency.	
3873 / Mr V G Danks / Objection	Why is development focussed on Abergavenny and Severnside? These locations are relying on a commuting workforce and becoming a commuter belt for Bristol and the Southwest. Build jobs, build transport infrastructure and then the workforce follows and this in turn creates settlements and communities - not the other way round.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. 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). When considered on a north/south basis, the primary settlements in the north of the county (Abergavenny and Monmouth) account for 37% of the county's residential growth and the south (Chepstow and Caldicot including Severnside) account for 49%. More specifically Abergavenny accounts for 22% of the county's residential growth and Severnside 35%. This is considered to be acceptable given Abergavenny's sustainable transport options and the Severnside's strong functional links with Newport, Cardiff and Bristol. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth.</p> <p>Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>With regards to infrastructure provision, in accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), an Infrastructure Delivery Plan has been prepared as part of the Deposit RLDP which identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites, having regard to information provided by the relevant infrastructure providers.</p>	No change required.
3886 / Mrs Nerys Wilson / Objection	Development should be concentrated in areas with existing infrastructure capacity. For Shirenewton growth should be incremental avoiding large scale residential that would disrupt the rural setting.	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. Whilst the spatial strategy confirms the dominant role of the primary settlements of Abergavenny,	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>Chepstow, Caldicot (including Severnside) and Monmouth, it also proposes an appropriate level of growth in the most sustainable lower tier settlements to deliver much needed affordable homes and to address rural inequality in accordance with the RLDP's objectives.</p> <p>Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Detailed comments relating to HA18 – Land West of Redd Landes, Shirenewton can be viewed elsewhere in the report with specific reference to site allocation.</p>	
3906 / Mr Philip Taylor / Support	Supports concentration of new housing in one main site per town as opposed to a scattered approach.	Support welcomed.	No change required.
3918 / Mrs Rhian Head / Objection	The housing plan should be top down, not bottom up. The council should plan where would be the most appropriate for development - brownfield sites. These would be unlikely to add to flooding risk. Not random parcels of land being proposed by private owners.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. However, 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</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>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.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDS) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDS features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p>	
<p>3925 / Mr Richard Lansberry / Objection</p>	<p>Monmouthshire are building houses to meet the demand of Bristol's housing needs, therefore find it hard to agree with any total number put forward by MCC. Having said that if it is deemed that houses are necessary I would suggest that they are not built on green field sites such as Mounon Road in Chepstow.</p>	<p>The RLDP's growth and spatial strategy is considered represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.</p> <p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. 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,</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>rebalancing our demography and economic prosperity, which is reflected in the policy framework.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, having regard to the concerns raised whilst also providing additional homes and enabling economic growth.</p> <p>Detailed comments relating to HA3 – Land at Mounton Road, Chepstow can be viewed elsewhere in the report with specific reference to site allocation.</p>	
3949 / Mrs Sarah Spencer / Objection	Too much emphasis on the South of Monmouthshire for housing - all that does is solve the housing issue for Bristol and South Glos Councils as their residents move over to Chepstow/Caldicot as housing is considerably cheaper.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. Spatially, the growth is considered to be well distributed throughout the County to help address affordability issues across Monmouthshire. The southern settlements of Chepstow and Caldicot account for 49% of the housing growth proposed and the northern primary settlements of Abergavenny and Monmouth account of 37%. This approach is consistent with Welsh Government's response to the 2022 Preferred Strategy, whereby they acknowledged the strong functional linkage with Newport, Cardiff and Bristol and "the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies". Furthermore, Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p>	No change required.
3950 / Ms Sarah Spooner / Support	No detailed comments provided.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3960 / Ms Sophie / Objection	There needs to be a better scheme in place to support low income home owners to make changes to older properties to become closer to net zero. Rather than just building new when there is the availability in the area.	The retrofitting of net zero carbon measure in existing properties is beyond the scope of the Replacement Local Development Plan, which sets out the policy framework for new development. It is, however, recognised as a key objective in the Council’s Climate and Nature Emergency Strategy.	No change required.
3965 / Mr Steve Jones / Objection	Designating Chepstow and Severnside as sustainable settlements without first resolving pre-existing issues with road networks and air quality (specifically A48 to either side of Chepstow, Highbeech roundabout and B4245 through Severnside) is clearly unsupportable. The RLDP must make mitigating access and congestion a pre-requisite to acceptance of the plan.	<p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward. Policy HA3 – Land at Mounon Road, Chepstow safeguards land for potential future improvements to the Highbeech roundabout.</p> <p>More generally, the traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	No change required.
3968 / Mr Steve Vickers / Objection	Suggests there appears to be a preference for developments alongside major transport routes where access is via significant junctions (look at M5 south of Bristol). This would indicate locations around Usk & Raglan interchanges may be options to explore as an alternative to Monmouth.	The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. The SSA confirms the dominant role of the primary settlements of Abergavenny, Chepstow, Caldicot and Monmouth, with this reflected in 86% of the level of housing growth proposed in these settlements. A lower proportion of growth is proposed for the County’s Secondary Settlement (5%) which seeks to find the appropriate balance between sustaining such settlements and delivering much needed affordable homes and reflecting the findings of the SSA.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3972 / Mrs Sue Young / Objection	There is a higher proportion of development in the south of the county, particularly in the Severnside area although you recognise that Caldicot town has less to offer than Abergavenny, Monmouth or Chepstow. Congestion is a key concern many residents need to negotiate the Highbeech roundabout which is already notoriously congested. The homes may be net zero but the increase in the number of cars will increase carbon emissions.	<p>The Settlement Hierarchy set out in Policy S2 reflects the findings of the Sustainable Settlement Appraisal (SSA) which has grouped settlements into tiers based on their role and function and has informed where development should be spatially located to achieve a sustainable pattern of growth. It is recognised that Caldicot and the Severnside cluster account for 35% of housing growth, however, in response to the 2022 Preferred Strategy, Welsh Government acknowledged the strong functional linkage with Newport, Cardiff and Bristol and “the concentration of new growth primarily in Caldicot and the Severnside area should reduce the potential to negatively impact on environmental assets and avoid consequences for climate and nature emergencies”. Welsh Government has not raised an objection to the Deposit Plan settlement hierarchy and distribution of housing growth. Overall, the spatial strategy and identification of suitable sites for allocation is considered appropriate and reflect the site search sequence outlined in national planning policy.</p> <p>Welsh Government is currently undertaking assessments (WelTAGS) to identify potential solutions to improve travel within Chepstow, which includes road improvements and the associated costs. In addition, Policy ST5 Transport Schemes of the RLDP supports and safeguards transport schemes set out in the Monmouthshire Local Transport Strategy (LTS). Improvements to the Highbeech roundabout are identified as a potential road scheme and the Council is currently liaising with Welsh Government on how to bring this forward. Policy HA3 – Land at Mounton Road, Chepstow safeguards land for potential future improvements to the Highbeech roundabout.</p> <p>More generally, the traffic implications of the Replacement Local Development Plan’s allocations have been assessed via a Strategic Transport Assessment. All allocations will also have to undertake a detailed Transport Assessment at the detailed planning application stage and satisfy Policy ST1 – Sustainable Transport Proposals.</p>	No change required.
3983 / Mr Tim James / Objection	Object to the new definition of allowing 'infill between existing buildings' in Tier 4 settlements. The wording should revert back to the Adopted LDP policy referring to 'between existing residential development'.	The approach taken to small scale rounding off or infilling opportunities in the Minor Rural Settlements is considered to be in accordance with Planning Policy Wales, which notes that infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity	Amend Policy S2 to refer to ‘small-scale rounding off’ in relation to Tier 4 settlements. The

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>Policy S2 could result in more residential development in the Minor Villages contrary to their position in the settlement hierarchy. No assessment of Tier 4 settlements has been undertaken as part of the Sustainable Settlement Appraisal.</p>	<p>(paragraph 3.60). It goes on to note in paragraph 4.4.24 that infill and windfall sites can make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall sites within settlements should be supported where they accord with the national sustainable placemaking outcomes.</p> <p>Within the context of placemaking in rural areas, PPW notes that the countryside must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors.</p> <p>The restrictions on the scale of rounding off or infill opportunities set out in Policy H3 and other relevant policies such as OC1 – New Built Development in the Open Countryside, are considered to reflect the balance referred to in PPW. The policy seeks to avoid encroachment into the open countryside, restricting development to the physical form of the settlement, but recognising that there may be small scale infill/rounding off opportunities that can help sustain minor rural settlements, subject to detailed development considerations.</p> <p>The Sustainability Settlement Appraisal covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council’s website at the time of the Deposit RLDP consultation was corrupt, so these settlements did not show properly. This matter has now been rectified, and the document is available to view on the Council’s website. The SSA, including the Tier 4 settlements were, however, considered in formulating the settlement hierarchy set out in Policy S2.</p> <p>For consistency with Policy H3 – Residential Development in Minor Rural Settlements, reference to ‘small-scale rounding off’ will be added to Policy S2.</p>	<p>relevant part of the policy will now read: “Within Tier 4 – Minor Rural Settlements, minor small-scale rounding off or infilling between existing buildings will be considered acceptable, subject to detailed policy considerations set out in the RLDP.”</p>
<p>3984 / Mr Tim Monckton / Objection</p>	<p>I do not think you should be building on countryside / farm land. I think the identified site in Abergavenny makes sense for road and train, but we should be protecting our countryside for future generations. We should be looking at brownfield sites first, including the old meat factory on the Hardwick roundabout</p>	<p>Due to the limited brownfield opportunities in Monmouthshire, greenfield opportunities have had to be considered through the site selection process to meet our key housing and employment requirements. A key consideration in assessing candidate sites has been the high percentage of Best and Most Versatile (BMV) agricultural land within Monmouthshire and the recognition that given the widespread distribution of BMV agricultural land it is not possible to avoid the development of such land via a different spatial strategy. In response the Deposit Plan consultation, Welsh Government provided support for the approach the</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>(that already has infrastructure in place and would be a quick answer (it is for sale currently).</p> <p>Flooding is a risk in that area, and surface run off needs to be addressed from the hill if you replace 35 ha of green farm land with concrete.</p>	<p>Council has taken in relation to the consideration of Best and Most Versatile (BMV) agricultural land and where there is a loss of BMV land, how this is justified. Welsh Government note that the Deposit RLDP considers and balances the overriding need for allocations involving BMV land and, recognises that while significant areas of BMV land will be developed, the LPA has demonstrated a sensible and pragmatic approach to considering BMV land loss in the context of national planning policy.</p> <p>The industrial unit adjacent to the Hardwick roundabout is protected for continued employment provision under Policy EA2 to help meet the RLDP's economic objectives.</p> <p>Land allocated in the RLDP is required to be in accordance with national planning guidance on flood risk, set out in Technical Advice Note 15: Development, flooding and coastal erosion. This seeks to ensure that the likelihood of flooding and the impacts it would have, have been appropriately considered in all relevant planning decisions.</p> <p>With regards to surface water run-off from development, surface water drainage requirements are subject to a separate regulatory framework, which requires drainage proposals for all new development to be fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage (SuDs) established by Welsh Government. All site allocations will be subject to this process to ensure the implementation of the effective management of surface water drainage through SuDs features. Further detail is provided in detailed Policy CC1 - Sustainable Drainage Systems and its supporting text.</p>	
3995 / Mrs Victoria Clark / Objection	Object to all of it.	The preparation of a Local Development Plan is a statutory requirement of the Council. The RLDP's growth and spatial strategy is considered to represent a sustainable level and distribution of growth, addressing our key local issues and objectives including the delivery of affordable homes, sustainable economic growth, rebalancing our demography, while responding to the climate and nature emergency.	No change required.



## Policy OC1 – New Built Development in the Open Countryside

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Support	Support Policy	Support welcomed.	No change required.
2489 / Councillor Lisa Dymock / Objection	Criteria appear too broad - should impose stricter conditions. Lack of clarity on how these policies interact in overlapping areas. To ensure consistency both policies should be strengthened to prioritise the preservation of the rural-urban boundary and require any permitted development to demonstrate that they will not contribute to settlement sprawl.	<p>The criteria set out in OC1 is reflected in national policy (PPW and Future Wales) which does allow some development in open countryside locations to support the rural economy, tourism and leisure, as well as affordable housing needs. Policy OC1 is to provide a Monmouthshire context and interpretation of national policy and sets out design criteria a)-d) that open countryside proposals will need to adhere.</p> <p>It is recognised that the list of policies referred to in criterion a) of Policy OC1 is not exhaustive. It is, therefore, considered appropriate to delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1, rather than try to provide a definitive list.</p> <p>The Plan is to be read as a whole and as such depending on the nature of the development proposal, various criteria-based policies throughout the Plan will be applicable for proposals within open countryside locations. For example, a tourism proposal Policies S12 and T1 will be applicable. For a community facility Policy S15 is applicable.</p> <p>In terms of the rural-urban boundary, Planning Policy Wales (PPW) recognises that within the context of rural areas, some forms of development may have specific land requirements which cannot be accommodated within settlement boundaries and local plans therefore should include criteria-based policies to consider such proposals when they are outside the settlement boundaries, to ensure that there are no unacceptable impacts. OC1 is one of these criteria based policies to ensure development carefully considers siting and design in open countryside locations.</p> <p>Please see this Report of Consultation responses for Policy GW1, however Policy GW1 and OC1 are not intended to overlap and are distinct policies from each other, with development proposals in green wedge land having stricter policy criteria applied, as set out in national policy.</p>	Delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1 from criterion a) of Policy OC1.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2505 / Councillor Steven Garratt / Support	OC1 seeks to minimise spread of development into the countryside and ensure connectivity to the settlement they are close to which will ensure protection of the wider rural landscape.	Support welcomed.	No change required.
3118 / Councillor Meirion Howells / Support	There is very little opportunity to develop on brownfield sites in Monmouthshire. There is no alternative to develop on open countryside if the choice is to provide houses for residents however these can be developed close to existing settlements.	Comments noted. The criteria set out in OC1 is reflected in national policy (PPW and Future Wales) which does allow some development in open countryside locations to support the rural economy, tourism and leisure, affordable housing needs in rural locations. Policy OC1 is to provide a Monmouthshire context and interpretation of National policy and sets out design criteria a)-d) that proposals will need to adhere to if in open countryside locations	No change required.
1367 / Abergavenny and District Civic Society / Objection	Aims of Policy OC1 are supported but appear to be inconsistent with Policy E2 if that policy is amended as per the Society's suggestion. Policy OC1 needs to be amended to allow greater flexibility to allow for employment opportunities.	<p>Comments noted. National policy (PPW and Future Wales) advocates an approach for LDPs to plan positively to meet the employment needs of rural areas (thus open countryside locations) through appropriate and proportionate economic growth and, therefore, the principle of employment uses in the open countryside is justified under national policy. RLDP Policies S11, RE1 and RE2, as well as Policy E2 also set out the policy framework to support employment opportunities outside settlement boundaries. In reference to Policy E2 and concerns raised regarding preventing employment opportunities on non-allocated land) please see the Council's response to Policy E2 – Non- allocated Employment Sites in the relevant section of this report.</p> <p>With regards to Policy OC1, it is recognised that the list of policies referred to in criterion a) of Policy OC1 is not exhaustive. It is, therefore, considered appropriate to delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1, rather than try to provide a definitive list.</p>	Delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1 from criterion a) of Policy OC1.
3059 / Magor with Undy Town Council / Objection	There are many other policies allowing development other than the definitive list in S2 adjacent to settlement boundaries and therefore open countryside. There is a conflict and it is misleading. Policy S2 needs updating to include	The criteria set out in OC1 is reflected in national policy (PPW and Future Wales) which does allow some development in open countryside locations to support the rural economy, tourism and leisure, affordable housing needs in rural locations. Policy OC1 is to provide a Monmouthshire context and interpretation of National policy and sets out design criteria a)-d) that proposals will need to adhere to if in open countryside locations.	Delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1 from criterion a) of Policy OC1.

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		<p>It is recognised that the list of policies referred to in criterion a) of Policy OC1 is not exhaustive. It is, therefore, considered appropriate to delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1, rather than try to provide a definitive list. This approach will also be applied to Policy S2 and the list of planning criteria also deleted from S2.</p> <p>The Plan is to be read as a whole and as such depending on the nature of the development proposal, various criteria-based policies throughout the Plan will be applicable to proposals within open countryside locations. For example, a tourism proposal, Policies S12 and T1 will be applicable. For a community facility, Policy S15 is applicable.</p>	
3168 / Roadchef Motorways Limited / Support	Support the inclusion of criterion (b) relating to new buildings, however, support must also be offered to other forms of development where required for their continued operation.	Support noted. In terms of motorway service station buildings additional new built development would be considered in the context of the existing services. Policy OC1 criteria is intended to ensure design to buildings in the open countryside are considered to limit their visual impact depending on context of the site and each proposal will be considered in a case-by-case basis.	No change required.
1663 / Richborough / Objection	OC1 should allow sufficient flexibility for appropriate development to be considered, state the policy or supporting text should be amended to clarify that PPW para 3.60 notes that development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Note new development away from existing settlements should be more strictly controlled.	Monmouthshire’s Policy OC1 does not make specific reference to adjoining settlement boundaries, as is not considered relevant to do so in the context of Policy OC1, which is to apply to development in all open countryside locations, also in locations away from the settlement boundaries. There are other policies within the RLDP that make specific reference to development adjoining settlement boundaries such as H9 Affordable Housing Exception Sites, H7 Specialist Housing, E2 Non-Allocated Employment sites, S15 Community and Recreation Facilities, and these specific policies sets out circumstances where development proposals could be acceptable adjoining boundaries. It is therefore not considered appropriate that reference should be made to new development away from settlement boundaries being more strictly controlled. The Plan is to be read as a whole, with the relevant policies applied.	No change required.
1965 / Monmouthshire Housing Association	In principle, MHA support the Managing Settlement Form policies of the Deposit RLDP.	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
(MHA) (GJPlanning) / Support			
1366 / Carney Sweeney Ltd / Objection	Concern regarding the application of OC1, specifically in respect of Tier 4 settlements and the ambiguity Policy S2 creates over whether a site is already within a Tier 4 settlement or not. Rewording of S2 suggested to address this.	Comments noted. Further changes to Policy OC1 are not considered necessary as Policy H3 – Residential Development in Minor Rural Settlements, and its supporting text, provide the necessary additional detail on appropriate development in Tier 4 settlements.	No change required.
1284 / Mr G Alan Horne / Support	The policy would benefit from the addition of the need to ensure that an increase in housing and employment go hand in hand with improvements to roads and services to reduce congestion and meet increased demand.	Comment noted. This comment does not have direct relevance to the content of Policy OC1. The Policy is not related to housing and employment growth. Policy S1 Growth Strategy, S2 Spatial Distribution of Development and Policy S6 Infrastructure address these requirements of the Plan.	No change required.
1779 / Mrs Sandra Lloyd / Objection	Should be updated to reference policy S2 regarding definitive list of what development is allowed in open countryside	Comments noted. It is considered that on reflection, rather than refer the reader to RLDP policies in criterion a), as the list is not exhaustive, it is preferable to refer the reader to national policy. It is recommended to delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1.  This approach will also be applied to Policy S2, please see the Council's response to Policy S2 in this Report of Consultation.	Delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1 from criterion a) of Policy OC1.
2739 / Janine Amos / Objection	Supports the ambitions but feels they are not adhered to in the RLDP in its current form, which in many instances and in particular with regard to HA11 conflicts with the Climate and Nature Emergency policies /Future Wales 2040 and the Future Generations Act, which we have a legal duty to comply with.	HA11 is a residential allocation therefore will be contained within Usk's settlement boundary (See the RLDP Proposal Map for settlement boundaries). Policy OC1 would not apply to the planning application considerations for HA11. Other policies within the plan however would apply, including Policies S4 Climate Change and S5 Green Infrastructure, LC1 Landscape and NR1 Nature Recovery, which aim to address the key issues of the Climate and Nature Emergencies, which is also set out as key issues within the RLDP(Para 3.1.1).  The RLDP is intended to be read as a whole and overall sets out the policy framework to ensure that development is delivered as sustainably as possible and	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		in a balanced manner, whilst also considering landscape, historic/cultural, geological heritage, biodiversity and local amenity considerations.	
2885 / Mr Jeffrey Parfitt / Objection	The destruction of a green field is in direct contravention of several Welsh Government policies designed to preserve wildlife habitats - guided by its commitment to halt biodiversity loss and restore ecosystems. Ref: The Environment Act 2016, Wellbeing of Future Generations Act 2015. PPW11. Sustainable farming scheme and 30 by 30 target	<p>The RLDP is intended to be read as a whole and overall sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also considering landscape, historic/cultural, geological heritage, biodiversity and local amenity considerations are acceptable.</p> <p>As set out in national policy, which is also reflected in Policy OC1, some development in open countryside locations could be considered acceptable if they provide agricultural and rural economy benefits or address affordable housing need and meet the criteria of a)-d) of OC1 as well as other relevant policies within the Plan.</p> <p>Chapter 6 of PPW has recently been strengthened with the ' Net Benefit for Biodiversity' approach. This places a duty on the Council to seek to maintain and enhance biodiversity by ensuring development does not cause significant loss of habitat or populations of species and must provide improved ecosystem resilience. The Plan's policies, including Policy NR1 – Nature Recovery. appropriately reflect this approach to ensure the continued protection and conservation of the County's natural environment.</p>	No change required.
2914 / Michael Hardy / Objection	Point d) - concerns over how the word 'unacceptable' is interpreted and by whom.	The policy will be applied to development proposals that are submitted via planning applications. The term 'unacceptable adverse impact' can be applied to a range of assessment criteria, this will be done with Council specialist Officers, such as Landscape, Biodiversity, Heritage, Transport and Planning Officers to form balanced and justified recommendation to members when making decisions on planning applications.	No change required.
3319 / Nr A Andrew Hubert von Staufer / Objection	Simply start again and throw back to both regional and national government that their policy is predicated on a situation that no longer exists. We need to plan proactively not reactively based on inaccurate information.	Comments noted, however not relevant directly to Policy OC1. National, Regional and Local policies, including the RLDP are based on the planning legislative framework for Wales.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3336 / Mrs Carolyn Chapman / Objection	At the proposed location the development would not have a single acceptable, positive, impact on any of the following:- landscape, historic / cultural or geological heritage, biodiversity or local amenity value	<p>Comments noted, however they are not relevant directly to Policy OC1.</p> <p>The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner, whilst also providing landscape, historic/cultural, geological heritage, biodiversity and local amenity considerations are acceptable.</p> <p>Further responses to land at Mounon Road can be found elsewhere in this report in reference to policy HA3 – Land at Mounon Road.</p>	No change required.
3340 / Mrs Cheryl Cummings / Objection	OC1 and GW1 are unrealistic	Comments noted. It is considered however that the policies are relevant, and the policies when read in conjunction with national policy, will help shape development proposals by directing unsuitable development proposals away from open countryside locations and locations that are designated green wedges.	No change required.
3409 / Mrs Isobel Hoare / Objection	Some years ago fields in my ownership were incorporated in Area of Outstanding Beauty. Very strange incorporation coming from old railway line, taking in these two fields then reverting back to railway line. This land is well out of flood plain and would be ideal for safe housing.(Scrub land next to last council homes Wyesham)	Comments not relevant to Policy OC1. Owner is advised to pursue pre-planning advice on how to bring this land forward if they wish to develop it.	No change required.
3492 / Claire Richards / Objection	Needs to reference policy S2 regarding the definitive list of what development is allowed in the Open Countryside.	<p>The criteria set out in OC1 is reflected in national policy (PPW and Future Wales) which does allow some development in open countryside locations to support the rural economy, tourism and leisure, affordable housing needs in rural locations. Policy OC1 is to provide a Monmouthshire context and interpretation of National policy and sets out design criteria a)-d) that proposals will need to adhere to if in open countryside locations.</p> <p>It is recognised that the list of policies referred to in criterion a) of Policy OC1 is not exhaustive. It is, therefore, considered appropriate to delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1, rather than try to provide a definitive list. This approach will also be applied to Policy S2 and the list of planning criteria also deleted from S2. Please see section Policy S2 of this report for further detail.</p>	Delete reference to Policies LC1, GI1, T1, RE3, RE4 and NR1 from criterion a) of Policy OC1.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The Plan is to be read as a whole and as such depending on the nature of the development proposal, various criteria-based policies throughout the Plan will be applicable to proposals within open countryside locations. For example, a tourism proposal Policies S12 and T1 will be applicable. For a community facility, Policy S15 is applicable</p>	
<p>3543 / Mr Paul Dalton / Objection</p>	<p>I have searched the document - I can't see where these are clearly set out.</p>	<p>These policies are set out in Section 7 - Managing Settlement Form, of the Plan.</p>	<p>No change required.</p>
<p>3615 / Mrs Elaine Moore / Objection</p>	<p>I do not believe this policy has been applied appropriately in terms of housing density and impact on landscape, heritage. Levels of density proposed are greater than form, bulk, size and scale of both the existing settlement and surrounding countryside. Selected sites (HA18 / CS0232) would have a significant impact on landscape, heritage, biodiversity, and dark skies.</p>	<p>Comment noted. This comment does not have direct relevance to the content of Policy OC1 which sets out the presumption that new build is not acceptable in open countryside locations and in circumstances where it is, specific design/amenity impact considerations. The settlement boundary has been drawn around allocations in the Plan – see the RLDP Proposals Map and the Settlement boundary review for further information. Further responses to Land West of Redd Landes can be found elsewhere in this report in reference to Policy HA18 – Land West of Redd Landes, Shirenewton.</p>	<p>No change required.</p>
<p>3634 / Dr Greg Palka / Objection</p>	<p>Policies OC1 and GW1 appear to prioritise urban expansion over environmental preservation. Specifically, they threaten green belt areas and natural habitats vital for carbon sequestration and biodiversity. These policies undermine local efforts to combat climate change, conflict with sustainable development principles outlined in the Well-being of Future Generations (Wales) Act 2015.</p>	<p>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. The RLDP sets out the policy framework to ensure that development is delivered as sustainably as possible and in a balanced manner.</p> <p>As set out in national policy, which is also reflected in Policy OC1, some development in open countryside locations could be considered acceptable if they provide agricultural and rural economy benefits or address affordable housing need and meet the criteria of a)-d) of OC1 as well as other relevant policies within the Plan.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		Policy GW1 sets out Monmouthshire’s green wedge designations, with the policy criteria set out in national policy PPW12 (3.64-3.78).	
3643 / Daniel Moore / Objection	I do not believe this policy has been applied appropriately to some of the Main Rural Settlement sites (HA18) in terms of housing density and impact on landscape, heritage etc. Levels of density proposed are greater than form, bulk, size and scale or both the existing settlement and surrounding countryside.	Comment noted. This comment does not have direct relevance to the content of Policy OC1. The settlement boundary has been drawn around allocations in the Plan – see the RLDP Proposals Map and the Settlement boundary review for further information. Further responses to Land West of Redd Landes can be found elsewhere in this report in reference to Policy HA18 – Land West of Redd Landes, Shirenewton.	No change required.
3845 / Mr Martin Sweeney / Support	Policy OC 1 seems largely sound, but I would note that the designation of site CS0270 is contrary to this policy as it lies outside the existing settlement boundary, on open countryside land and has significant negative impacts on wildlife, biodiversity, archaeological heritage and amenity benefit.	<p>Comment noted. The settlement boundary has been drawn around allocations in the Plan – see the RLDP Proposals Map and the Settlement boundary review for further information.</p> <p>Policy OC1 will therefore not be applicable to a planning application submission to develop CS0270/ HA4 Land at Leasbrook.</p> <p>Further responses to Land at Leasbrook can be found elsewhere in this report in reference to Policy HA4 – Land at Leasbrook.</p>	No change required.
3886 / Mrs Nerys Wilson / Comment	Policy OC1 should ensure development is small scale and respects historic layout and form.	Proposals will be assessed on case-by-case basis, however the criteria set out in Policy OC1 is such that scale and size is a consideration, see criteria (c) and historic heritage is a consideration, see criteria (d) of development proposals in open countryside locations.	No change required.
3909 / Mr Piers Jacobs / Objection	It says there is a presumption against new built development in the open countryside, unless justified under national planning policy. Agree, but the development location for Chepstow is in open countryside so surely this means that you are already going against your own future policy? In which case, doesn't this make this policy redundant? The Plan needs to	<p>Comment noted. The settlement boundary has been drawn around allocations set out in the Plan – see the RLDP Proposals Map and the Settlement boundary review for further information.</p> <p>Policy OC1 will therefore not be applicable to a planning application submission to develop HA3 Land at Mounton Road.</p> <p>Further responses to Land at Mounton Road can be found elsewhere in this report in reference to Policy HA3 – Land at Mounton Road.</p>	No change required.



Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	implement what its own policies say it will do!		
3925 / Mr Richard Lansberry / Objection	New build should be allowed on certain Open Countryside sites but only where it can be attached to existing villages and hamlets. A small number of properties could be added in numerous locations without detriment to the existing housing stock or village community.	<p>The RLDP has already gone through this process, and this is set out through Policy S2 para 6.4.2 which sets out the growth strategy to Monmouthshire’s settlements. Residential Site Allocations (p111) sets out these locations, which have gone through a Candidate Site assessment process to allocate the best and most suitable sites for development within Monmouthshire.</p> <p>Furthermore, policies H1, H2 and H3 also set out circumstances where residential development in Monmouthshire’s settlements including villages is acceptable, such as infilling and rounding off settlements.</p> <p>Unallocated housing in the open countryside would not be supported unless justified with national policy, such as Affordable Housing Exceptions (H7) or Specialist housing (H9).</p>	No change required.

## Policy GW1 – Green Wedge Designations

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3588 / Wye Valley National Landscape - Planning Officer - Miss Catherine Laidlaw / Comment	Welcome the majority of the retention of the Green Wedge in Chepstow as this contributes to the setting of the Wye Valley National Landscape by safeguarding the distinction between open countryside and urban form.	Support noted.	No change required.
3588 / Wye Valley National Landscape - Planning Officer - Miss Catherine Laidlaw / Objection	Refer to the inclusion of the new green wedge between Abergavenny and the BBNP. State as National Landscapes hold the same level of significance as National Parks it seems a missed opportunity not to include Monmouth in the Green Wedge Assessments and establish a similar buffer for the Wye Valley National Landscape. Suggest this is pertinent considering the town's role in key views and the high-value landscape and visual receptors associated with the National Landscape. Suggest evidence base is lacking regarding the landscape function of areas surrounding Monmouth.	<p>The green wedge assessment and review process is based on the appropriateness of existing green wedge designations under the current adopted LDP (Policy LC6) and the potential designation of new green wedges on land between the settlement edge of Abergavenny and the statutory designation BBNP (whereby PPW 3.68 sets out that green wedges may be used to provide a buffer between the settlement edge and statutory designations). The land assessed between Abergavenny and the BBNP was assessed in response to the submission of a specific Candidate Site for Protection request, to consider the land between Abergavenny and the BBNP boundary for green wedge protection due to development pressure. This land was therefore considered in the Green Wedge Assessments (LUC, 2024).</p> <p>National planning policy in PPW sets out a presumption against development outside settlement boundaries (unless exceptionally justified) therefore there is a presumption against development in open countryside locations. As well as national policy protection there are locally specific policies in the RLDP that protect the unique special character and appearance of the Wye Valley National Landscape (AONB). Policy LC4 of the Plan sets out specific criteria to protect the Wye Valley National Landscape. It also sets out that</p> <p>‘Development Proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.’ It is therefore considered that there is a sufficient and robust policy framework in place to protect the Wye Valley National Landscape (AONB) from inappropriate development in order to maintain its unique character, special landscape qualities and local distinctiveness.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In reference to an evidence base regarding the landscape function of areas surrounding Monmouth, a Landscape Sensitive update (White Consultants, October 2020) has been undertaken, as well as site specific landscape appraisals that have been submitted as part of the candidate site assessment process.</p>	
<p>1803 / Councillor Dr Louise Brown / Objection</p>	<p>Support the proposals, except that the current boundary for the green wedge for Chepstow and Pwllmeyric should be kept so that land at Mounton Road Chepstow is not built upon.</p>	<p>Support for the Green Wedge proposals noted.</p> <p>With regards to the concern in relation to the loss of the land /change to the boundary to the Chepstow/ Pwllmeyric/Mathern Green Wedge, the Council's approach to green wedge designations is consistent with the methodology for green wedge assessments established by Land Use Consultants (LUC) on behalf of the South East Wales local planning authorities. Reflecting this, the Council has designated land with a high or moderate-high green wedge potential as green wedge designations in the RLDP. As set out in the Green Wedge Review (2025), the land referred to (parcel CPM10) has not been designated as through its green wedge assessment (LUC 2024) 'the tree belt along St Lawrence Lane forms a strong boundary to the land south west, and the A48 forms a boundary to the south east limiting the impact that development here would have on the adjacent land and on the remaining gap between Chepstow and Pwllmeyric' The parcel makes a moderate contribution to preventing settlement coalescence, managing urban form, safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a moderate buffer role. Therefore, the potential for green wedge designation is moderate.</p> <p>A Green Wedge Review (2025) has also been undertaken to conclude the green wedge assessment process. It is considered that in line with the assessment evidence, the parcels of land have been fully and objectively considered for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12). It is concluded there is not a significant reason in context of the green wedge purposes that the land parcel CPM10 should be retained as a green wedge designation. For further information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025).</p>	<p>No change required.</p>
<p>2489 / Councillor Lisa Dymock / Objection</p>	<p>Policy lacks robust enforcement mechanisms. Should explicitly prohibit large scale developments and include</p>	<p>Green Wedge Policy is set out in national policy PPW12 (3.64 - 3.78,) which explicitly sets out the policy criteria. Policy GW1 is a local planning policy that identifies Monmouthshire's green wedge designations (accompanied by the</p>	<p>No change required.</p>

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	<p>stricter criteria for assessing any proposals. Lack of clarity on how policies GW1 and OC1 interact in overlapping areas. To ensure consistency both policies should be strengthened to prioritise the preservation of the rural-urban boundary and require any permitted development to demonstrate that they will not contribute to settlement sprawl.</p>	<p>Proposals Map). National Policy and GW1 should be read in conjunction. The Development Plan Manual 3rd ed. specifies that local plan policies should not unnecessarily repeat National Policy. It is, therefore, not considered appropriate to amend the policy as suggested.</p> <p>Policy GW1 did not intend to overlap with Policy OC1, with Policy GW1 being a specific policy to identify Monmouthshire’s locally designated green wedges. Please also see the Report of Consultation responses for Policy OC1.</p>	
2505 / Councillor Steven Garratt / Support	<p>GW1 will ensure the new developments will have a separate identity and help with the wildlife corridors.</p>	<p>Support noted.</p>	<p>No change required.</p>
1056 / Abergavenny Town Council / Support	<p>Fully support the green wedge designation for Abergavenny.</p>	<p>Support comment noted.</p>	<p>No change required.</p>
1367 / Abergavenny and District Civic Society / Objection	<p>Welcome the policy wording of GW1 but object to the green wedge boundary in the vicinity of HA5 and propose an amended boundary (ref: 1367 Plan 1). Land has been omitted from the boundary with little explanation.</p>	<p>The Council's approach to green wedge designations is consistent with the methodology for green wedge assessments established by Land Use Consultants (LUC) on behalf of the South East Wales local planning authorities. Reflecting this, the Council has designated land with a high or moderate-high green wedge potential in Abergavenny as green wedge in the RLDP. As set out in the Green Wedge Review (2025), the land referred to (parcel AG9) has not been designated as through its green wedge assessment (LUC 2024) this land was considered to have a moderate contribution to managing urban form and protecting the setting of Abergavenny, with an overall moderate potential for green wedge designation. Accordingly, there was not considered to be sufficient justification to designate this parcel of land as green wedge in the RLDP. In contrast, parcel AG10, the land immediately north west of AG9, has a strong contribution to managing urban form and protecting the setting of Abergavenny, with a moderate-high potential for green wedge and has therefore, been designated as green wedge in the RLDP. Please refer to the Council’s Green Wedge Review (2025) Background Paper for further detail.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>As set out in Green Wedge Assessment (LUC, 2024), the differentiation between the green wedge purposes of the parcels AG9 and AG10 are broadly that AG9 has lower slopes and is not considered fully distinct with the urban area. Parcel AG10 has steeper topography and little urbanising influence. Although it is appreciated that there is concern that not designating parcel AG9 as green wedge could lead to development encroachment, it is considered that the Green Wedge Assessment has fully and objectively considered the potential for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12).</p> <p>The Council has, therefore, been appropriately guided by the evidence set out in the Green Wedge Assessments (LUC 2024) in determining the green wedge designations in Abergavenny. As such it is considered that the designation of parcel AG9 as green wedge, as suggested in the representation (REF1367 Plan 1), would not be appropriate in view of the evidence. Although the concern for windfall development in this area is recognised, it is considered that the settlement boundary does provide a sufficient and robust protection from such development, as set out in national policy. Additionally, development proposed on the land will need to meet the criteria as set out in the Policy OC1, as well as any other exceptional justification criteria as set out in the Plan.</p>	
<p>1367 / Abergavenny and District Civic Society / Objection</p>	<p>A society proposal for a Green Wedge in the Gavenny Valley (CSP001) has been assessed by the LPA as an Area of Amenity Importance and rejected. Presume its Green Wedge potential was not assessed because it is not considered to fit the PPW guidance. Hope that the settlement boundary and other constraints will sufficiently protect the area.</p>	<p>Comment noted. As the respondent has referred to, the green wedge potential of CSP001 for Gavenny Valley did not form part of the Green Wedge Assessment (LUC, March 2024) as CSP001 land was considered sufficiently distant from the BBNP boundary to not be considered as land that could purposefully be green wedge buffer land between Abergavenny's settlement edge and the BBNP boundary. It was considered more appropriate to assess the land for protection as part of the Area of Amenity Importance (AAI) Review. Although the concern for windfall development in this area is recognised, it is considered that the settlement boundary does provide a sufficient and robust protection from such development, as set out in national policy. Additionally, development proposed on the land will need to meet the criteria as set out in the Policy OC1, as well as any other exceptional justification criteria as set out in the Plan.</p>	<p>No change required.</p>
<p>3562 / Gateway to Wales Action</p>	<p>National Park and AONB have the same level of protection so suggest there should</p>	<p>The green wedge assessment and review process is based on the appropriateness of existing green wedge designations under the current adopted LDP (Policy LC6)</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
Group / Objection	be a green wedge around the AONB to cover the Landscape Setting.	<p>and the potential designation of new green wedges on land between the settlement edge of Abergavenny and the statutory designation BBNP (whereby PPW 3.68 sets out that green wedges may be used to provide a buffer between the settlement edge and statutory designations). The land assessed between Abergavenny and the BBNP was assessed in response to the submission of a specific Candidate Site for Protection request, to consider the land between Abergavenny and the BBNP boundary for green wedge protection due to development pressure. This land was therefore considered in the Green Wedge Assessments (LUC, 2024).</p> <p>National planning policy in PPW sets out a presumption against development outside settlement boundaries (unless exceptionally justified) therefore there is a presumption against development in open countryside locations. As well as national policy protection there are locally specific policies in the RLDP that protect the unique special character and appearance of the Wye Valley National Landscape (AONB). Policy LC4 of the Plan sets out specific criteria to protect the Wye Valley National Landscape. It also sets out that</p> <p>‘Development Proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.’ It is therefore considered that there is a sufficient and robust policy framework in place to protect the Wye Valley National Landscape (AONB) from inappropriate development in order to maintain its unique character, special landscape qualities and local distinctiveness.</p>	
3622 / Wedgwood Park Residents Management Company Limited / Support	We support the proposed green wedge around Abergavenny (Policy GW1 7.2.3 page 48) to protect the natural environment, biodiversity and ecosystems and the connectivity between them whilst maximising the benefits to people’s health and well-being. This would provide essential protection over and above the existing conservation area status (in line with policies HE1 and HE2). The green wedge would help reinforce the clear	Support noted.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	boundary of the edges of the settlements and preserve the long standing views to and from the national park which is one of the defining features of Abergavenny as a gateway to the National Park.		
1493 / Vistry Homes Limited / Objection	Promoting Land at St Lawrence Lane (CS0112) for residential development, which has been allocated as a Green Wedge. The development proposals of the CS are designed to allow a smaller Green Wedge to be maintained to ensure no coalescence of the settlements, whilst delivering well-designed, additional housing in a sustainable location. A revised Green Wedge boundary could be formed by existing and proposed landscape features to create a strong green boundary in perpetuity.	Comments noted. The Green Wedge Review has undertaken a robust assessment of the parcel of land, which Land at St Lawrence Lane (CS0112) forms a part of. This assessment has evaluated the parcel of land for green wedge potential against the green wedge purposes as set out in PPW12 and has concluded that land parcels CPM 7 and CPM 8 (the land in which CS0012 falls within) has a high potential for green wedge designation, and as set out Green Wedge Review (2025) background paper, it was concluded that land with a high potential for green wedge should be designated as such. It is not considered necessary to revise the green wedge boundary as suggested to allow for development associated with candidate site submission CS0112 as there is sufficient and more suitable land available for residential development within Chepstow to accommodate its housing need, namely the allocated site Land at Mounton Road (CS0165/Policy HA3), which sits to the north east of this site. It is, therefore, considered that the land referred to in the representation (CS0112) is appropriately retained as green wedge in the RLDP in accordance with the supporting green wedge evidence.	No change required.
1502 / Hallam Land Ltd / Objection	Object to the green wedge allocation on land promoted under CS0128 Chapel Farm, Abergavenny. MCC has failed to demonstrate that there is demonstrable need for a green wedge in this area. It is also illogical given the proximity of existing development to the BBNP boundary and is inconsistent with the arbitrary boundary drawn through parcels AG9 and AG10 in relation to HA5 housing allocation. Southern section of CS0128 should be excluded from the Green Wedge boundary.	Comments noted. PPW 12 notes that green wedges may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. It notes that green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. Ensuring a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer-term need for development land, the effects of development pressure in the area and the need to minimise demand to travel.  The Green Wedge Review has undertaken a robust assessment of the parcel of land, which Chapel Fields (CS0128) forms a part of. This review has demonstrated that parcel AG8 (the land which CS0128 falls within) has a moderate-high potential for green wedge designation and, as set out in Green Wedge Review (2025)	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>background paper, it was concluded that land identified as having a high-moderate potential for green wedge in Abergavenny (reflecting green wedge purposes set out in national planning policy) is appropriately designated as green wedge in the RLDP. Further detail is set out in the Council’s Green Wedge Review Background Paper (2025).</p> <p>The green wedge assessment process has objectively considered the potential for green wedge designations against the assessment criteria (green wedge purposes set out in PPW12). It is not considered that the southern section of the site referred to should be excluded from the green wedge designation as there is no justification to do so. As set out in Green Wedge Assessments (LUC, 2024), the differentiation between the green wedge purposes of land parcels AG8 and AG9 are broadly that AG8 makes a strong contribution to protect the setting of Abergavenny and its Conservation Area. Parcel AG9 makes only a moderate contribution to the protection of Abergavenny’s settlement and management of urban form and encroachment into the countryside.</p> <p>In terms of the residential allocation at Penlanlas Farm (Policy HA5), this falls largely within parcel AG9 (which is not designated as green wedge), with a small north-western portion of the allocation within parcel AG10 (which has been designated green wedge).</p> <p>However, as outlined in the Report of Consultation response for HA5, this land is to be retained as GI/public open space, retaining an open aspect to the north-western section of the allocation, consistent with the surrounding and adjoining green wedge designation. Its inclusion in the HA5 allocation is, however, important to providing access to the site and contributing to the site’s net-biodiversity and green infrastructure requirements, as well as securing an appropriate buffer between the residential development and the national park/settlement edge of Abergavenny.</p> <p>Having regard to PPW, the RLDP’s growth and spatial strategy, the overarching site selection process, and the findings of the Green Wedge Review (2025), a green wedge designation has been made on AG8 and AG10, the exception of approximately 1ha of land, which is within the boundary of allocation HA5, and as noted above is identified as a buffer zone.</p>	



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1533 / Manor Farm Partnership / Objection	Green Wedge designation relating to CS0168 does not serve a meaningful purpose in preventing urban coalescence and should be re-evaluated in terms of its strategic purpose. The natural landscape and existing infrastructure provide an effective mechanism for preventing coalescence rendering the designation redundant. Similarly, the Cardiff-Newport Green Belt designation introduced in Future Wales provides a more strategic and robust mechanism for managing coalescence rendering Green Wedges redundant.	<p>Comments noted. The green wedge assessment process has objectively considered the potential for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12) for the land that contains candidate site CS00168 - Land adjacent to Merlin Close), (referenced ULR2 in the Green Wedge Assessments (LUC 2024)). Overall, despite a moderate potential for green wedge designation, it was considered that given the narrow band of land between the settlements of Rogiet and Undy, it was appropriate to designate as green wedge based on Purpose 1 – Coalescence. The Green Wedge Review (2025) therefore concluded that this land was suitable for green wedge designation. See Green Wedge Review (2025) for further information.</p> <p>In terms of the indicative Green Belt set out in Future Wales, the area of land referred to in the representation (relating to candidate site submission CS0168) is considered to fall outside this indicative Green Belt boundary (which has been interpreted as relating to land to the north of the M4). In any event, the assessment and subsequent designation of Green Belts is a matter for Strategic Development Plan (SDPs), not local development plans. The assessment of local green wedge designations in LDPs is considered appropriate and necessary and reflect the provisions of national planning policy on this matter.</p>	No change required.
1663 / Richborough / Support	Strongly support the continued identification of a green wedge designation between Rogiet and Caldicot noting the evidence base clearly demonstrates that the green wedge continues to serve an important purpose.	Support noted.	No change required.
1965 / Monmouthshire Housing Association (MHA) (GJPlanning) / Support	In principle, MHA support the Managing Settlement Form policies of the Deposit RLDP.	Support noted.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2280 / Candleston Homes (Savills) / Support	Candleston Homes support the approach taken to parcel AG9 in the Green Wedge Assessment undertaken by LUC and agree with the exclusion of this parcel from the Green Wedge. This is consistent with the Landscape Assessment undertaken for CS0192 Land off Old Hereford Road, Abergavenny.	Support noted.	No change required.
2394 / Taylor Wimpey (Savills) / Objection	Parcel RC3 fails to consider the planned and safeguarded Severn Tunnel Junction Railway Link Road against the green wedge tests. Cannot be sound to propose the designation of land as a green wedge when the assessment work that underpins it fails to consider a piece of infrastructure that the Deposit Plan safeguards.	Comment noted. As referred to, Monmouthshire's Local Transport Strategy (LTS) and Policy ST5 of the RLDP safeguards a transport link road through this parcel of land (RC3). PPW however allows certain types of development in green wedges that preserve the openness and do not conflict with the purposes of the green wedge land within it, which includes local transport infrastructure (paragraph 3.77). Details of the link road scheme needed to spatially define the safeguarded route, are not currently available.	No change required.
1739 / Save Our Unique Landscape (SOUL) / Support	Support the proposal to create a Green Wedge along the northern boundary of the town, adjoining the BBNP. The BBNP provides an important backdrop to the Abergavenny area, protecting its setting from encroachment by inappropriate development.	Support noted	No change required.
1575 / Ms Janet Horton / Support	GW1 - The recognition of the importance of 'green wedges' is very welcome	Support welcomed.	No change required.
1646 / Mr Brian Williams / Objection	Whilst I support the concept the allocations do seem very limited in scale. I think there should be a green wedge established on the land around the northern end of the Nedern Brook wetland SSSI - bounded by the M48, A48, Caerwent-Caldicot (Church Road) and at	The green wedge assessment and review process is based on the appropriateness of existing green wedge designations under the current adopted LDP (Policy LC6) and the potential designation of new green wedges on land between the settlement edge of Abergavenny and the statutory designation BBNP. This was in response to the submission of candidate sites for protection to consider the land between Abergavenny and the BBNP boundary for green wedge protection due to development pressure and paragraph 3.68 of PPW12, which sets out that green	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>least some land to the west of the old MOD railway line. Whilst I recognise the SSSI designation makes building here less likely I think formal recognition of the need to protect this area of biodiversity importance would be beneficial. There has already been encroachment towards the SSSI by development at Caldicot and the southern end of the SSSI will be potentially impacted by proposed development HA2.</p>	<p>wedges ‘may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area.’</p> <p>With regards to the protection of land between the M48/A48, national policy clearly states that development within SSSI land is unacceptable (6.4.24). National policy also sets out that development in ‘functionally linked land’ (which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their conservation objectives) would not be acceptable. Therefore, it is considered that there is sufficient and robust buffer protection to statutory designated conservation sites, such as SSSIs under National Policy and a green wedge designation is therefore not considered necessary in relation to the area suggested.</p>	
1675 / Dr Mary Barkham / Support	<p>Support the deposit plan in full however has particular support for Green Wedge between Abergavenny and Bannau Brycheiniog National Park, the Green Infrastructure Plans to ensure protection and enhancement of GI in the county and the housing allocation to east of Abergavenny.</p>	Support noted.	No change required.
1693 / Miss Sylvia Stevens / Support	<p>I welcome the statement that Green Wedges are to remain and that exceptional justification will be required to build within.</p>	Support noted	No change required.
1816 / Dr. Gary C. Smith / Support	<p>Supports buffer between Abergavenny and Bannau Brycheiniog National Park.</p>	Support noted.	No change required.
1999 / Mr Thomas Benson / Support	<p>Strong support for the Green Wedge along the northern boundary of Abergavenny as a buffer zone to the National Park.</p>	Support noted.	No change required.
2060 / Dr Christopher	<p>I support the recognition of the Green Wedge along the northern boundary of</p>	Support noted.	No change required.

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Heneghan / Support	Abergavenny, as a buffer zone to The National Park.		
2099 / Mrs Jocelyn Nada / Support	Supports the green wedge plan on northern boundary of Abergavenny to act as buffer to national park	Support noted.	No change required.
2324 / Mrs Susan Sandford / Objection	Proposed development will mean the loss of the majority of the green wedge separating Chepstow and Pwllmeyric which is not justified.	<p>Comment noted. As part of the RLDP process, the green wedges in the current adopted (2011- 2021) have been reviewed. The Council's approach to green wedge designations is consistent with the methodology for green wedge assessments established by Land Use Consultants (LUC) on behalf of the South East Wales local planning authorities. Reflecting this, the Council has designated land with a high or moderate-high green wedge potential as green wedge designations in the RLDP. As set out in the Green Wedge Review (2025), the land referred to (parcel CPM10) has not been designated, as through its green wedge assessment (LUC 2024) it was considered the parcel 'makes a moderate contribution to preventing settlement coalescence, managing urban form, safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a moderate buffer role. Therefore, the potential for green wedge designation is moderate'.</p> <p>A Green Wedge Review (2025) has also been undertaken to conclude the green wedge assessment process. It is considered that in line with the assessment evidence, the parcels of land have been fully and objectively considered for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12). It is concluded there is not a significant reason in context of the green wedge purposes that the land parcel CPM10 should be retained as a green wedge designation.</p> <p>There is still a significant proportion of land between the settlements of Chepstow and Pwllmeyric that has been designated as green wedge as evidenced through the Green Wedge Assessments (LUC, 2024) and the Green Wedge Review (2025). For further detailed information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025) background paper.</p>	No change required.
2887 / Mr Kevin Nolan / Support	We fully support the proposed green wedge around Abergavenny (Policy GW1 7.2.3 page 48) in order to protect the	Support noted.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>natural environment, biodiversity, ecosystems and the connectivity between them while maximising the benefits to people’s health and well-being. In particular, we support the proposed green wedge north of Herbert Close. This would provide protection additional to its existing conservation area status in line with policies HE1 and HE2. This woodland is within The Hill CADW registered historic park and garden and the green wedge would recognise its importance in the landscape.</p>		
<p>3172 / Richard Liddell / Objection</p>	<p>Importance of site HA3 - Land at Mounton Road as Green Wedge has been reinforced as recently as 2024 with the planning application DM/2024/01242 - Screening opinion for EIA development.</p>	<p>Comment noted. The screening opinion for the EIA (DM/2024/01242) in relation to the proposed mixed-use allocation at Mounton Road, Chepstow was issued prior to conclusions of the green wedge review, which has appropriately removed the green wedge designation for the land at Mounton Road.</p> <p>As part of the RLDP process, the green wedges in the current adopted (2011- 2021) have been reviewed. The Council's approach to green wedge designations is consistent with the methodology for green wedge assessments established by Land Use Consultants (LUC) on behalf of the South East Wales local planning authorities. Reflecting this, the Council has designated land with a high or moderate-high green wedge potential as green wedge designations in the RLDP. As set out in the Green Wedge Review (2025), the land referred to (parcel CPM10) has not been designated as through its green wedge assessment (LUC 2024) ‘the tree belt along St Lawrence Lane forms a strong boundary to the land south west, and the A48 forms a boundary to the south east limiting the impact that development here would have on the adjacent land and on the remaining gap between Chepstow and Pwllmeyric’ The parcel makes a moderate contribution to preventing settlement coalescence, managing urban form, safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a moderate buffer role. Therefore, the potential for green wedge designation is moderate.’</p>	<p>No change required.</p>

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		<p>A Green Wedge Review (2025) has also been undertaken to conclude the green wedge assessment process. It is considered that in line with the assessment evidence, the parcels of land have been fully and objectively considered for green wedge designations against the identified assessment criteria (green wedge purposes set out in PPW12). It is concluded there is not a significant reason in context of the green wedge purposes that the land parcel CPM10 should be retained as a green wedge designation.</p> <p>There is still a significant proportion of land between the settlements of Chepstow and Pwllmeyric that has been designated as green wedge as evidenced through the Green Wedge Assessments (LUC, 2024) and the Green Wedge Review (2025). For further detailed information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025) background paper.</p>	
<p>3215 / Jonathan (Jonty) Pearce / Objection</p>	<p>There should be a Green Wedge around the Wye Valley National Landscape (AONB)</p>	<p>The green wedge assessment and review process is based on the appropriateness of existing green wedge designations under the current adopted LDP (Policy LC6) and the potential designation of new green wedges on land between the settlement edge of Abergavenny and the statutory designation BBNP (whereby PPW 3.68 sets out that green wedges may be used to provide a buffer between the settlement edge and statutory designations). The land assessed between Abergavenny and the BBNP was assessed in response to the submission of a specific Candidate Site for Protection request, to consider the land between Abergavenny and the BBNP boundary for green wedge protection due to development pressure. This land was therefore considered in the Green Wedge Assessments (LUC, 2024).</p> <p>National planning policy in PPW sets out a presumption against development outside settlement boundaries (unless exceptionally justified) therefore there is a presumption against development in open countryside locations. As well as national policy protection there are locally specific policies in the RLDP that protect the unique special character and appearance of the Wye Valley National Landscape (AONB). Policy LC4 of the Plan sets out specific criteria to protect the Wye Valley National Landscape. It also sets out that</p> <p>‘Development Proposals that are outside the National Landscape (AONB) but would detract unacceptably from its character and setting will not be permitted.’ It is therefore considered that there is a sufficient and robust policy framework in place</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		to protect the Wye Valley National Landscape (AONB) from inappropriate development in order to maintain its unique character, special landscape qualities and local distinctiveness.	
3736 / Mr Hugh Taylor / Support	Supportive of a green wedge being continued between Chepstow, Pwllmeyric and Mathern.	Support noted.	No change required.
3886 / Mrs Nerys Wilson / Comment	Must emphasize the protection of green spaces preventing urban sprawl and safeguarding the rural settlements that defines Shirenewton.	Comments noted. The existing green wedge between the settlements of Shirenewton and Mynyddbach has been retained. For further information please see Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025) background paper.	No change required.
3906 / Mr Philip Taylor / Support	Strongly supports GW designation for Abergavenny, Llanfoist, and the BBNP boundary.	Support noted.	No change required.
3965 / Mr Steve Jones / Support	GW1 - retaining existing green wedges between communities is strongly supported.	Comments noted. The green wedge assessment and review process is based on the appropriateness of existing green wedge designations under the current adopted LDP (Policy LC6) and the potential designation of new green wedges on land between the settlement edge of Abergavenny and the statutory designation BBNP (whereby PPW 3.68 sets out that green wedges may be used to provide a buffer between the settlement edge and statutory designations). For further detailed information please refer to the Green Wedge Assessments (LUC, 2024) and Green Wedge Review (2025) background paper.	No change required.
3972 / Mrs Sue Young / Objection	<p>The Green Wedge areas are not very clear to see on the map.</p> <p>The development at Caldicot appears to merge Caldicot and Portskewett and there doesn't seem to be anything to prevent further development to Leechpool and the roundabout.</p>	<p>National planning policy in PPW sets out a presumption against development outside settlement boundaries (unless exceptionally justified) therefore there is a presumption against development in open countryside locations, such as Leechpool.</p> <p>Policy GW1 is a local planning policy that identifies Monmouthshire's green wedge designations (accompanied by the Proposals Map, which is available to view online and also paper copies are available at the Council Offices). National Policy and GW1 should be read in conjunction. The Development Plan Manual 3rd ed. specifies that local plan policies should not unnecessarily repeat National Policy.</p>	No change required.

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		Please see the report of consultation responses for Policy HA2 – Land East of Caldicot/North of Portskewett in relation to the concerns raised to this proposed strategic development.	