

Appendix 2: Draft Review Report Consultation - Summary of the Key Issues Raised

A summary of the key issues raised in relation to the questions on the Draft Review Report consultation is provided below. The full consultation report on the Draft Review Report, incorporating MCC's responses and recommended changes to the Review Report, can be viewed via the following link: [LDP Draft Review Report Consultation Responses - Representor Order.pdf](#)

Table 1: Question 1 Do you agree that the main issues that should be considered in the full LDP Review have been identified?

- **Agree:** 18 respondents agree that the main issues have been identified
- **Disagree:** 12 respondents do not agree that the main issues have been identified
- **Neither Agree or Disagree:** 5 respondents neither agree or disagree that the main issues have been identified

Issue Raised	Representor	Change to Review Report (RR)
Agree that the Main issues have been identified		
Key policy indicators relating to housing provision have been considered, clear references to dwelling completions, affordable housing completions, housing land supply, the delivery of strategic housing sites and the fact they are not being achieved. Agree with most recent AMR to continue with an early review as a result of the need to address the shortfall in the housing land supply and facilitate the identification /allocation of additional housing land.	9.1, 13.1, 21.1, 23.1, 28.1, 30.1, 31.1, 47.1, 48.1, 50.1, 51.1, 52.1	No change.
Do not Agree that the Main issues have been identified		
More detail is required on infrastructure, highways and traffic.	1.1	No change. These matters will be considered as part of the LDP revision.

Issue Raised	Representor	Change to Review Report (RR)
Removal of Severn Bridge Tolls will result in additional pressure for additional housing, house prices and population in Monmouthshire.	1.1, 15.1, 20.1, 24.1, 34.1, 36.1, 37.1, 39.1, 45.1, 56.1	No change. These matters will be considered as part of the LDP revision.
Full revision needed as soon as possible, cannot afford to wait for joint working due to lack of completions since adoption. Need to ensure a continued deliverable 5 year supply of housing on suitable, deliverable sites.	12.1, 47.1	No change.
Further explanation required regarding joint working with neighbouring authorities and the production of Strategic Development Plans.	15.1, 39.1	Amendment to the RR to further address issues of joint working.
The DRR does not fully acknowledge that the adopted LDP placed an over-reliance on strategic site allocations, which have a long lead in period before development can take place.	20.1, 47.1	Amendment to RR to acknowledge an overreliance on strategic sites and lack of flexibility in the adopted LDP.
Need to extend the current plan period, the implications arising from this should be identified as a main issue. The plan period is not fully addressed, the Council should elaborate on the reason for selecting 2036 at the end of the plan period.	20.1, 23.1, 39.1	RR to be amended to clarify the proposed plan period.
More explanation and consideration of population and household projections should be provided.	20.1, 26.1, 34.1, 37.1, 46.1, 53.1	No change. These matters will be considered as part of the LDP revision.

Table 2: Question 2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?

- **Agree:** 15 respondents agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan
- **Disagree:** 5 respondents do not agree that existing LDP vision, issues and objectives remain relevant for a revised Plan
- **Neither Agree or Disagree:** 13 respondents neither agree or disagree that the existing LDP vision, issues and objectives remain relevant for a revised Plan

Issue Raised	Representor	Change to Review Report (RR)
Agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan.		
The current LDP objectives and the Local Well-Being Plan objectives are complimentary to the seven goals of the Well-Being of Future Generations Act.	11.2, 40.2	No change
Support the LDP Spatial Strategy for focusing development within the three main market towns followed by Severnside Settlements.	12.2, 15.2	No change.
Do not agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan.		
Need to add more flexibility into the Spatial Vision of the Plan, should be more focus on delivering housing outside the main towns to ensure continuity of supply and a range of sites to aid wider housing delivery.	9.2	No change. These matters will be considered as part of the LDP revision.
Since adoption of the LDP there have been a number of important contextual changes at a national, regional and local level that need to be considered in the vision, issue and objectives.	23.2, 36.2	As above.
The current housing supply position should also be reflected in the vision/issues and objectives. The failure to balance housing supply with demand has resulted in a worsening in the affordability of housing.	23.2	As above.
There are emerging issues which should be added that could influence the vision, issues and objectives, specifically, any impact as a result of the Severn Tolls abolition.	22.2, 23.2, 48.2, 52.2	As above.

Table 3: Question 3 Do you agree that the adopted LDP Spatial Strategy is functioning effectively?

- **Agree:** 6 respondents agree that the strategy is working
- **Disagree:** 17 respondents do not agree that the strategy is working
- **Neither Agree or Disagree:** 9 respondents neither agree or disagree with the functioning of the strategy

Key Issues Raised	Representor	Change to Review Report (RR)
Agree that the Strategy is Working		
Support strategy of focusing development in 3 main towns but additional sites needed which accord with this strategy	12.3, 15.3, 16.3, 47.3	Amend RR to make a recommendation on whether the strategy needs revising and, if so, the form the revision should take.
Spatial strategy is robust and effective	22.3	As above.
Strategy functioned effectively directing growth to higher order settlements. New strategy should continue to allow for housing growth in Severnside settlements to ensure alignment between economic and housing strategies (links to CCR City Deal and tolls)	45.3	As above.
Disagree that the Strategy is Working		
Strategy not working due to failure to make adequate assessment of need for gypsy traveller pitches and allocation of sites to meet existing need	4.3	As above.
Strategy failed due to overreliance on delivery of strategic sites and insufficient flexibility to allow for other sources of housing to come forward – led to shortfall of completions.	3.2, 13.3, 21.3, 40.3	As above.
Undelivered housing allocations need to be re-assessed to ensure they remain viable and deliverable	3.2, 13.3, 21.3, 34.2, 36.3	As above.
Need for greater flexibility and additional site allocations. Scope for increased delivery / small-medium size developments in Rural Secondary Settlements and Rural settlements.	23.3, 40.3, 42.2	As above.
Strategy should be reviewed in light of extended plan period and contextual changes since LDP adoption (aspirations and opportunities associated with CCR City Deal and Tolls)	23.3, 36.3, 53.3, 56.3	As above.

Key Issues Raised	Representor	Change to Review Report (RR)
Strategy should be re-assessed to include release of land outside settlement limits/ potential de-allocation of green wedge land.	36.3	As above.
60% AH contribution for main village sites should be reconsidered as too high (a reduction would improve viability of such sites and enable more to come forward)	3.2, 26.3, 42.3	As above.
Strategy too reliant on larger main town developments. Should consider development of smaller 'secondary' and 'rural' areas,	11.3	As above.
Level of housing growth needs to be reconsidered – 2014 projections cannot be relied on; factor in current undersupply due to allocated sites not coming forward at expected rates.	12.3, 15.3	As above.
Level of housing growth should not be reduced to past build rates (due to lack of 5 year supply against residual method)	20.3, 47.3	As above.
No justification in reviewing deliverability of outstanding strategic allocations	16.3	As above.
Oppose any additional sites – existing sites should be retained and reviewed properly	26.3	As above.
Strategy should be refined to encourage growth in a range of settlements including settlements where there has been no housing provision. There may have been changes to settlements that would have improved their level of sustainability e.g. Llanover – now a village shop	46.3	As above.
Strategy should include minor villages (up to 15 dwellings with focus on AH)	50.3	As above.
Strategy too focused on Severnside at expense of other areas e.g. Usk, which are suitable for additional development	51.3	As above.
Appropriate amount of development should be considered in rural areas to fulfil housing need (current strategy failed to detriment of rural locations)	52.3	As above.

Table 4: Question 4 Do you agree with the findings of the LDP policy review?

- **Agree:** 13 respondents agree with the findings of the LDP policy review
- **Disagree:** 16 respondents disagree with the findings of the LDP policy review
- **Neither Agree or Disagree:** 8 respondents neither agree or disagree with the findings of the LDP policy review

Main Issues Raised	Representor	Change to Review Report (RR)
<p>Policy S1 Spatial Distribution of New Housing Provision</p> <ul style="list-style-type: none"> • Four representors consider that undelivered sites need to be de-allocated, and additional sites allocated. • Two representors consider that the spatial strategy is too reliant on housing in the main towns/Sevenside. • Other representors consider that this emphasis on the main towns is correct. • One representor considers that Sevenside had a disproportionate level of growth. • Five representors consider that there is scope for additional housing development in Rural Secondary Settlements or villages, with one representor referring to the requirement in TAN2 to ensure that all communities, both urban and rural, have sufficient good quality housing for their needs. 	<ul style="list-style-type: none"> • 9.4, 13.4, 15.3, 16.4 • 11.3, 40.3 • 12.2, 20.2 • 20.2 • 23.3, 40.3, 42.1, 46.4, 52.3 	<p>Comments noted. Policy amendments will be considered as part of the LDP revision.</p>
<p>Policy S2 Housing Provision</p> <ul style="list-style-type: none"> • Four representors consider that undelivered sites need to be de-allocated, and additional sites allocated. • One representor seeks a transparent dialogue before any sites are deallocated. 	<ul style="list-style-type: none"> • 9.4, 13.4, 15.3, 16.4 • 45.4 	<p>As above.</p>
<p>Policy S3 Strategic Housing Sites</p> <ul style="list-style-type: none"> • Five representors consider that the LDP is overly reliant on strategic housing sites. 	<ul style="list-style-type: none"> • 13.4, 20.1, 21.3, 40.3, 47.5 	<p>RR amended to acknowledge the overreliance on strategic housing sites in the adopted LDP. Policy amendments will be considered as</p>

Main Issues Raised	Representor	Change to Review Report (RR)
		part of the LDP revision.
<p>Policy S4 Affordable Housing Provision</p> <ul style="list-style-type: none"> • One representor considered that affordable housing policies would benefit from clearer explanation. • One representor stresses the importance of affordable housing and considers that some employment allocations could be revised to allow affordable housing allocations. • Two representors reiterate the need for affordable housing requirements to be looked at flexibly and to be based on viability evidence. • One representor expresses concern that affordable housing requirements might be reduced. 	<ul style="list-style-type: none"> • 1.4 • 7.5 • 9.4, 21.4 • 28.4 	Comments noted. Policy amendments will be considered as part of the LDP revision.
<p>Policy S9 Employment Sites Provision</p> <ul style="list-style-type: none"> • One representor considers that employment allocations should be revised to reflect e-commerce. • One representor requests the allocation of good quality, accessible employment sites in Abergavenny to reduce the need to travel. • One representor requests a revision of employment allocations to maximise the benefits from City Deal and changes to the Severn Bridge tolls. • One representor considers that small scale employment allocations should be made in minor villages. 	<ul style="list-style-type: none"> • 7.6 • 33.2 • 36.3 • 48.4 	As above.
<p>Policy S11 Visitor Economy</p> <ul style="list-style-type: none"> • One representor supports the policy's aim to encourage tourism. • One representor considers that allocations for larger facilities is needed in addition to promoting sustainable tourism such as glamping. • One representor considers that the existing policy is overly restrictive. 	<ul style="list-style-type: none"> • 30.2 • 36.4 • 48.2 	As above.
<p>Policy S13 Landscape, Green Infrastructure and the Natural Environment</p> <ul style="list-style-type: none"> • One representor seeks clarification of this policy in particular with regard to how it affects development viability. 	<ul style="list-style-type: none"> • 34.3 	As above.

Main Issues Raised	Representor	Change to Review Report (RR)
<p>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites</p> <ul style="list-style-type: none"> • One representor cautions against confusion need for pitches with demand. • One representor does not agree that Policy H8 is functioning effectively and argues that the 2009 needs assessment needs to be revised. 	<ul style="list-style-type: none"> • 2.2 • 4.4 	As above.
<p>Policy RET1 Primary Shopping Frontages</p> <ul style="list-style-type: none"> • One representor supports a review of this policy to ensure designations are up to date and appropriate. 	<ul style="list-style-type: none"> • 30.2 	As above.
<p>Policy SD1 Renewable Energy</p> <ul style="list-style-type: none"> • One representor considers that renewable energy should be supported. 	<ul style="list-style-type: none"> • 30.2 	As above.
<p>Policy SD2 Sustainable Construction and Energy Efficiency</p> <ul style="list-style-type: none"> • One representor suggests that this policy may no longer be a planning function so should be reviewed. 	<ul style="list-style-type: none"> • 3.3 	As above.
<p>Policy SD3 Flood Risk</p> <ul style="list-style-type: none"> • Two representors object to the deletion of this important policy. 	<ul style="list-style-type: none"> • 24.6, 26.6 	As above.
<p>Policy LC6 Green Wedges</p> <ul style="list-style-type: none"> • Two representors consider that Green Wedges should be reviewed to allow additional housing growth. • One representor considers that Green Wedges should become Green Belt to be strengthened. 	<ul style="list-style-type: none"> • 16.4, 47.3 • 26.6 	As above.
<p>Policy M2 Minerals Safeguarding Areas</p> <ul style="list-style-type: none"> • One representor considers that mineral safeguarding areas should be reviewed to ensure they are fit for purpose. 	<ul style="list-style-type: none"> • 16.4 	As above.

Main Issues Raised	Representor	Change to Review Report (RR)
Policy MV1 Proposed Developments and Highway <ul style="list-style-type: none"> One representor considers this policy needs to be strengthened to ensure sustainable development is accompanied by infrastructure. 	<ul style="list-style-type: none"> 26.6 	As above.
Policy MV2 Sustainable Transport Access <ul style="list-style-type: none"> One representor suggested performance under this policy has probably improved but a detailed analysis could explore the scope for greater effectiveness. 	<ul style="list-style-type: none"> 37.4 	As above.
Policy MV6 Canals and Redundant Rail Routes <ul style="list-style-type: none"> One representor considers that the benefit of this policy is limited due to its limited scope and that a strong canal-related policy should replace it, emphasising the multiple benefits of the Mon-Brecon Canal. 	<ul style="list-style-type: none"> 6.1 	As above.
Heritage Policies <ul style="list-style-type: none"> One representor considers that heritage policies will need to be reconsidered in light of the Historic Environment Act. 	<ul style="list-style-type: none"> 49.1 	As above.
Policy DES1 General Design Considerations <ul style="list-style-type: none"> One respondent questions if this policy is functioning entirely effectively. 	<ul style="list-style-type: none"> 34.3 	As above.
Policy DES2 Areas of Amenity Importance <ul style="list-style-type: none"> One representor expresses concern that open spaces are being reviewed but they will be more important if extra development is to be proposed. One representor welcomes this review. 	<ul style="list-style-type: none"> 28.4 34.3 	As above.
Policy SAH11 Main Villages <ul style="list-style-type: none"> Two representors considers that policy amendments are needed to make SAH11 Main Village sites viable and deliverable. One representor would welcome the reconsideration of sites for affordable housing if other constraints have been overcome. One representor strongly objects to any additional development sites main villages. 	<ul style="list-style-type: none"> 3.5, 9.3 5.1 26.6 	As above.

Table 5: Question 5 Do you agree that the LDP needs to be revised? If so, short form or full revision?

- **Short Form:** 11 respondents support a short form revision of the LDP
- **Full Revision:** 28 respondents support a full revision of the LDP

Main Issues Raised	Representor	Change to Review Report (RR)
Support a Short Form Revision		
SFR to enable Policy SAH11 to be revised (ensure main village allocations are viable and deliverable)	3.5	RR to be amended to make a recommendation on whether or not a LDP revision should take place and, if so, whether it should be a short form or full revision.
SFR to enable housing supply situation to be addressed	32.5, 40.5	As above
SFR unlikely to require substantial allocations of new housing land or a new spatial strategy, it may enable some other revisions and would avoid a policy vacuum. Provides breathing space for regional /interregional needs to be assessed. Comments on joint plans but notes that given political and practical challenges of collaborative working do not consider that a joint plan could be adopted in time to avoid a policy vacuum. SFR would allow time to progress on SDP providing context for a joint LDP. Concern that joint plan would be less tuned to needs of Monmouthshire’s towns/countryside and residents would have less influence on policies and proposals.	37.5	As above
SFR would allow for some critical new ‘local’ policies to be put in place quickly and would avoid a potential policy vacuum after 2021.	55.4	As above

Main Issues Raised	Representor	Change to Review Report (RR)
Support a Full Revision		
Full revision to ensure all housing needs, including G/T, are addressed	4.5	As above
Full revision needed to meet WG regulations, ensure provision made to extend the plan period. Existing strategy is not working, need for updated housing requirements and land allocations to end of revised plan period.	9.5, 13.5, 21.5	As above
Full revision needed to ensure strategies and policies are kept up-to-date based on latest evidence to support the future supply of housing.	12.5, 15.5, 45.5	As above
Full review should commence as soon as possible – MCC cannot afford to wait for joint working on a joint plan given current housing land supply situation	15.5	As above
Full review needed to take account of contextual, legislative and policy changes that have occurred e.g. CCR City Deal (economic opportunities)	16.5, 23.5, 24.5, 39.5	As above
Main towns should remain focus of revised strategy	21.5	As above
Full revision would ensure all matters are properly considered.	22.5	As above
Full revision would ensure LDP considers and addresses all factors (not just housing supply). This is important given interaction between housing supply and other aspects of the LDP e.g. policies (including spatial strategy, economic aspirations, infrastructure requirements and environmental/ landscape designations). Consequences of the level of change required justifies full revision.	23.5, 47.5	As above
Full revision – enable new, deliverable, viable housing allocations	34.5	As above
Full revision – enable significant changes to the level and spatial distribution of growth over a longer plan period. Extended plan period and associated land requirements will result in substantial changes to the strategy.	36.5	As above
Full revision required to address shortfall in housing land supply and to identify additional sites. Level and distribution of growth must have regard to contextual matters such as tolls, CCR City Deal (align with economic aspirations for the region). Full revision needed in addition to progressing a SDP.	53.5	As above

Table 6: Question 6 Other Comments on the Draft Review Report

Main Issues Raised	Representor	Change to Review Report (RR)
Consider opportunities associated with the removal of the Severn Bridge Tolls	1.8	No change. This matter will be considered and addressed as part of the LDP revision.
Should not rely solely on the 2011 and 2014 projections. A wide range of factors should be taken into consideration in considering growth options, including the opportunities associated with the abolition of Severn Bridge Toll and CCR City Deal.	9.6, 13.6, 21.6, 22.6, 23.6	As above.
Ensure Welsh Water are consulted to ensure the provision of foul drainage to mains public sewer on allocated sites is feasible within their AMP programme. Consider whether SFCA is required.	10.4, 35.1	As above.
Further consideration should be given to the potential for preparing a joint plan.	14.1	Review Report to be amended to further address this issue.
Suggest that an urban capacity study is carried out to consider capacity of growth of main towns and identify appropriate 'preferred directions' for future housing development – could inform the candidate site assessment process.	20.6	No change. This matter will be considered and addressed as part of the LDP revision.
Consider that preparation of a joint plan with neighbouring authorities would not be efficient or appropriate at the present time as it would delay provision of appropriate plan-led controls in place to guide local development. A SDP would provide the suitable regional tier of plan and would allow for further collaborative working.	22.6	No change.
Suitability of some housing sites needs to be reassessed.	28.6	No change. This matter will be considered and addressed as part of the LDP revision.
Community involvement in the revision process, including housing growth and site selection, is very important. Role of place plans and town teams should be recognised.	29.1, 33.6	As above.
Any new housing growth must be matched by growth in infrastructure.	29.1	As above.

Main Issues Raised	Representor	Change to Review Report (RR)
A number of representors are seeking to promote sites.	9, 12, 13, 15, 16, 20, 47, 48, 50, 51, 52	As above.