

## Q1 (Section 2) : Do you agree that the main issues that should be considered in the full LDP Review have been identified?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.1	Chepstow Society	Disagree	More detail on infrastructure, highways and traffic. The removal of the Severn Bridge tolls will result in pressure on housing, house prices and population in the Chepstow area.	Comment noted. The removal of the bridge tolls is considered in paragraphs 2.2.16 and 5.4 of the Draft Review Report. Infrastructure, highways and traffic are matters that will be considered in any LDP revision.	No change to the Review Report (RR)
3.1	Trustees of the Late Mrs H M Langham	Agree		Agreement noted.	No change to the RR.
4.1	Heine Planning	Agree	Pleased to note consideration of Gypsy Traveller issues and need for sites	Agreement noted.	No change to the RR.

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7.1	Mr Alan Horne	Disagree	<p>What impact, if any, will loss of the EU Structural and Rural Development Funds have? Broadband fixed and mobile connectivity are essential tools of modern day living, business and working from home. There are a number of black spots in Monmouthshire which might prevent people moving to those areas. The growing trend of home working should be taken into account when reviewing land allocated for employment. Are the assumptions made in the past still relevant? Should the priority be to re-allocate land for employment to residential and recognise the realities of modern day living and working? What guidance, if any, should be given to planners in ensuring new home are connected by fibre and cater for home working?</p>	<p>Comments noted. Given the uncertainty over the timing and form of any exit from the European Union it is not considered appropriate or necessary to consider this issue in the RR. The importance of broadband connectivity is recognised although the LDP can have limited influence over this issue. The potential deallocation of employment land will be a matter to be considered in any LDP revision. It is agreed that consideration needs to be given to employment sectors and land requirements as part of any plan revision.</p>	No change to the RR.

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9.1	SA Brain & Co Ltd	Agree	The key policy indicators relating to housing provision have been considered. There is clear references to dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites and the fact that they have not been achieved over the past four years. Correctly, this has been identified as the main priority and issue to be considered as part of the full LDP Review. Agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.
10.1	Natural Resources Wales	Agree	The main issues to be considered in the full LDP Review have been identified. With regard to section 2.2.7, The South-East Wales Area Statement is currently being developed and is due to be finalised in 2019. Happy to assist with any queries on the development of the Area Statement and its evidence base.	Agreement noted.	Amend para. 2.2.7 of the RR to note that the South East Wales Area Statement is due to be finalised in 2019.
11.1	Mr Paul Cawley	Agree		Agreement noted.	No change to the RR.

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12.1	RPS Planning	Disagree	A full review of the plan needs to occur as soon as possible. Monmouthshire County Council (MCC) cannot afford to wait for joint working to put a plan in place due to the evidenced lack of completions since the LDP was adopted in 2014 and to ensure a continued deliverable 5 year supply of housing on suitable, deliverable sites in main towns such as Abergavenny.	Comment noted. The RR acknowledges a need for additional housing sites and is currently not suggesting carrying out a joint plan with neighbouring authorities, a position that the respondent appears to support.G63	No change to the RR.
13.1	Ward Estates Ltd	Agree	Agree that the key policy indicators relating to housing provision i.e. dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites are not being achieved and are the main priority and issues to be considered as part of the full LDP Review. Also agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.

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15.1	Bovis Homes (RPS)	Disagree	If decide to progress with a Monmouthshire only focused LDP, further justification should be provided regarding joint working with neighbouring authorities and the production of Strategic Development Plans (SDP). The relationship between the LDP review, future SDPs and the City Deal should be fully explained and explored should future cross-boundary working to deliver housing and economic development become meaningful and collaborative.	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.
15.1			Notwithstanding this it is considered a full review of the plan needs to occur as soon as possible. MCC cannot afford to wait for joint working to put a plan in place due to lack of completions, to ensure a continued deliverable 5 year supply of housing and to assess and address the extent of the impact of Cardiff Capital Region and the reduction/abolition of the Severn Bridge Tolls on a Monmouthshire basis. It is considered that the impact of their removal will be more significant than just an uplift in house prices, the area, and in particular, Monmouth and Chepstow will become even more of a desirable place to live thereby coming under pressure for further housing growth. The impact should be fully explored and included within growth rate figures included within the LDP Review	It is not agreed that the issues of potential increased housing growth should be addressed in the Review Report. This will be a matter to be considered in any LDP revision.	No change to the RR.

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16.1	Bovis Homes (Walsingham Planning)	Agree		Agreement noted.	No change to the RR.
20.1			A further issue not fully addressed is the plan period which is proposed to extend to 2036. It is assumed that this year has been selected as it would allow for a 15 year plan period. Guidance in Planning Policy Wales (2.1.5) advises that at least 10 years of the plan period should remain at the point of adoption. It is clear that the aim is to avoid the previous position where following adoption only 7 years remained in the plan period. The Council should elaborate on the reason for selecting 2036 as the end of the plan period.	It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP.	RR to be amended to clarify the proposed plan period.

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20.1			Section 2 also refers to revised household projections. Whilst the 2014 population and household projections favour a higher level of growth than the earlier 2011 projections, they remain lower than the 2008 projections which informed the current LDP. The 2014 based projections would have resulted in the need for 240 dwellings a year if they had been applied to the Plan Period 2011 – 2021. Completions achieved during that period have exceeded this figure and would have increased if a wider choice of deliverable sites had been provided. This should not therefore be used as a justification for projecting similar figures to the whole of the extended plan period up to 2036.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.	No change to the RR.
20.1	Hallam Land Management (Asbri)	Disagree	Whilst the limited progress of strategic housing sites is discussed as a key policy indicator, the section does not fully acknowledge that the adopted LDP placed an over-reliance upon the strategic site allocations, which have a long lead in period before development can take place. It will be important in reviewing the plan that a greater proportion of non strategic sites, which can be shown to be capable of early delivery, should be considered as part of the review process.	Comment noted. This will be a matter to be considered through any LDP revision.	RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.

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20.1			The Council should not project a lower dwelling requirement over the whole of the new plan period up to 2036. An anticipated build rate of 250 dwellings a year would be insufficient and would not meet demand associated with economic growth, in particular relating to the removal of Severn Bridge tolls.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision.	No change to the RR.
21.1	Hallam Land Management (Boyer)	Agree	Agree that the key policy indicators relating to housing provision i.e. dwelling completions, affordable housing completions, housing land supply and the delivery of strategic housing sites are not being achieved and are the main priority and issues to be considered as part of the full LDP Review. Also agree with the recommendation of the most recent AMR to continue with an early review of the Monmouthshire LDP as a result of the need to address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land.	Agreement noted.	No change to the RR.
22.1	Redrow Homes	Agree	The influence of crossing the Severn bridge for no cost will need to be carefully considered when looking at future housing requirements and employment growth. The WG commissioned Arcadis Report 'Longitudinal Viability Study of the Planning Process' and recommendations within should be considered.	Agreement noted. The WG commissioned Arcadis Report 'Longitudinal Viability Study of the Planning Process' can be taken into account in any LDP revision.G117	No change to the RR.



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23.1	Richborough Estates (Turley)	Neither Agree Nor Disagree	The Report provides a useful overview of the issues that should be considered as part of the LDP Review. Agree that housing provision and supply are key issues to be addressed. This is demonstrated by the Council's AMR, which identifies a significant under provision of new dwellings since adoption of the LDP. The AMR confirms that this failure to deliver sufficient housing has also led to a significant under provision of affordable housing. The need to extend the current plan period, and the implications arising from this, should also be identified as a main issue in this section. Many of the issues identified are 'fluid' and will need to be given due consideration as the review progresses, e.g. the implications of the Cardiff Capital Region and City Deal and progress with Strategic Development Plans.	Comments noted. The RR recognises the need for additional housing allocations. Other issues referred to will be considered as part of any LDP revision. It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP.	RR to be amended to clarify the proposed plan period.
24.1	Mrs Carolyn Ovenden	Disagree	No account has been taken of the effect of probable removal of Severn Bridge tolls nor the potential problem of recyclable waste disposal now that it cannot be sent to China	The RR recognises that the removal of the Severn Bridge tolls could be a potential issue that would require consideration in any LDP review. Recycling policy is not a matter for the LDP, although if this influences the demand for recycling sites this could be considered as part of any LDP revision	No change to the RR.

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26.1	Cllr Louise Brown	Disagree	Far too much focus on the lack of a 5 year supply of housing. In view of the 2008 population projections being too high then this factor needs to be taken into account. It would be far better to adopt a lower population projection to avoid this problem in the future. If a lower population projection level was used then this would require a lower build rate and may then bring the LDP within the 5 year supply without having to do anything further. It would also avoid any unnecessary additional sites which are not already in the current approved local development plan. A lower population projection would make it easier to reach the 5 year supply of housing and be more realistic in terms of building rates. The LDP draft review seems to have one focus only the emphasis should be on providing good quality sustainable development with the required infrastructure and considering the wellbeing of residents and their air quality.	Comments noted. Reducing the housing target could only be done through a revision to the LDP. The appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.	No change to the RR.

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28.1	Llangybi Community Council	Neither Agree Nor Disagree	Agree that the main issues, namely the failure to meet the housing and affordable housing targets by some considerable margins, have been identified. The question needs to be asked – why have so many of the main villages sites failed to attract any interest from developers? Changes in local amenities since the original viability assessments were carried out could be the reason and so a complete reassessment is warranted.	Comment noted. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
30.1	Monmouth Chamber of Commerce	Agree	Concur with the need in 2.1.3 of the Draft Report to increase the number of affordable housing completions during the remaining period of the LDP. Support the creation of skilled jobs with pay rates above the minimum wage (it is an objective of the existing LDP to create higher paid skilled jobs), which would mean that younger people could afford local house prices (see 2.2.16) . Support the principles of the Cardiff Capital Region City deal as described in 2.2.12 and efforts to rectify the underemployment of economically active women mentioned in 2.2.15.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

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31.1	Mr Adrian Lewis	Agree	The review appears to consider comprehensively the issue. One factor worth considering is to challenge the Welsh Government's population projections given the possible impact of Brexit and the potential demand for properties from the Bristol area post toll-free crossing.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision and will take into account revised population projections and contextual changes such as those referred to by the respondent.	No change to the RR.
32.1	Mr Rees Williams	Agree	Agree except for housing and land shortfall due to changes in demand/supply.	Agreement noted.	No change to the RR.
33.1	Abergavenny Town Council	Agree	Agree that housing provision continues to be a significant issue in Monmouthshire. In Abergavenny we have seen significant residential development without any notable improvement to local infrastructure so would request that the policy relating to infrastructure provision is revisited. Also of the opinion that the design and quality of the residential development and other development that has taken place does not reflect the local vernacular and as a consequence the special character of the town is gradually being eroded. Consider protection of the economic and historical fabric of the market towns of the County to be a main issue. In recent months a number of shops in the town becoming vacant as a result of increase costs such as business rates. This is likely to worsen unless there are policies which actively support town centres to grow.	Comments noted. These are matters to be considered in any LDP revision. Business rates is not a matter that the LDP can influence.	No change to the RR.

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34.1	Barratt David Wilson Homes	Comment	<p>Monmouthshire should follow the guidance within the Minister's letter in April 2014 and utilise the 2014-based housing projections as a starting point for calculating the future housing requirement only. The removal of the Severn Bridge toll is a major economic factor that is not accounted for within the household projections and will no doubt contribute to an increase in demand for new housing in Monmouthshire. To reduce the housing requirement in line with 2014-based housing projections would be overly simplistic and would result in the Local Planning Authority continuing to provide a shortfall of housing to meet the appropriate need.</p>	<p>The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates, as well as the contextual change referred to by the respondent. Paragraphs 2.3.5 and 2.3.6 of the RR do not specifically state that any revised LDP's housing target should be reduced to take account of the more recent projections but states that they are factors that need to be taken into account in reconsidering the LDP Strategy's level of housing growth.</p>	No change to the RR.

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36.1			<p>The existing position with regards to the undersupply of housing land is set to be further exacerbated by the reduction / removal of Severn Bridge tolls. It is considered that the full implications for the housing market in Monmouthshire must be considered. The increase in demand for houses in Monmouthshire will substantially increase pressure on an already underachieving housing market. The release of further land, particularly in southern/eastern Monmouthshire, for housing will be required to address both the current position, and the worsening position anticipated. The economic / employment opportunities presented by the removal of tolls is an issue which the LDP review should capitalise on by providing employment sites of a size and scale appropriate to meet potential demand. The LDP review should include a review of the LDP's employment land allocations to address this opportunity. The impact of the 'Cardiff Capital Region City Deal' is also a critical issue which the LDP review must fully consider.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

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36.1	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>It is agreed that a series of issues regarding housing provision are required to be considered as part of the LDP review. With the plan being adopted for only 4 years, and the housing land supply currently standing at just 4.1 years, significant and far-reaching changes to the plan are required to address issues surrounding housing provision. It is considered that in light of the magnitude of the shortfall in housing land supply, a comprehensive review of the plan's overarching spatial strategy will need to be undertaken, including a re-assessment of settlement boundaries and potential de-allocation of green wedge land to achieve deliverable housing sites of the extent demanded. In regard to the Authority's consideration of revised household projections it is agreed that it is appropriate to review the level of housing growth, but the 2014-based projections should not be adhered to at cost to both housing need and economic development. It is considered that the plan should provide for future need and growth as well as taking account of current need and historical under delivery. Furthermore the implications of the extended replacement plan period need to be fully assessed in terms of implications for housing growth.</p>	<p>Comments noted. The RR acknowledges that there is a need to consider new housing allocations. The respondent also seems to be suggesting that the LDP spatial strategy needs considerable revision, further suggesting that a Full revision of the LDP is required. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. 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 revision or a full revision.</p>

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37.1	Abergavenny & District Civic Society		<p>What is meant by 'the full LDP Review' – the final version of this report or a full revision? The main issues are identified, but some extra analysis is needed to understand some key conclusions. The LDP process appears pre-occupied with ensuring a sufficient supply of housing with little consideration of the need to reduce the journey to work. The difficulties of securing a sustainable housing-work balance should be given greater consideration. The report implies that any plan revision will need to decide whether any employment sites should be de-allocated or re-allocated to other uses, and whether any new sites are required. Unfortunately, it does not contain any town-by-town analysis.</p>	<p>The scope for confusion over the terms 'review' and 'revision' is acknowledged. The RR does try to distinguish between the full review now being carried out - to be followed by a LDP revision if considered necessary. The benefits of a town-by-town analysis can be appreciated and will be looked at in more detail as part of any LDP revision process. It is not considered that such a level of detail is required at this stage, the aim of which is to assess, in broad terms, whether or not the existing LDP is working effectively.</p>	No change to the RR.



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37.1			<p>Local Development Plans rely greatly on population and household projections supplied by Welsh Government. Variations in these undermine the credibility of the present plan and potentially its revision. As the extent of the need for extra homes is usually central to the debate during LDP preparation, the Review Report should give more explanation and consideration to the matter of projections and forecasts or targets based on planning objectives. The draft report exposes the slow delivery of extra homes between 2011 and 2021, more analysis of the housing market is needed e.g. have landowners (which include the county council) been holding on to land in the hope of higher residual values or because of S106 delays? Are house builders stemming supply to increase profits or finding that buyers cannot afford their products? At a time when population and household projections are significantly behind the provisions for housing in the adopted LDP, it would seem premature for the Review Report to imply a pressing need for substantial new allocations of land when sufficient land is already allocated. There is a danger that the allocation of more greenfield sites to satisfy the notional five-year supply requirement will undermine the development of more difficult brownfield sites; the real need is to expedite the</p>	<p>Comments noted. The future level of housing growth will be a matter for any LDP revision. The failure to meet housing targets as set out in the current LDP does suggest that policies need to be revised. This could result in the release of more housing land or, conversely, a re-consideration of the housing targets in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are matters to be considered in any LDP revision.</p>	No change to the RR.

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			development of existing allocations, and the threat of de-allocation may help.		
37.1			<p>Disappointed that viability assessments at the stage of planning applications come to different conclusions from those conducted when sites were allocated. Wonder if some developers are overpaying for land at the expense of affordable housing contributions. While the policies may be realistic and necessary, it will be prudent to make more realistic forecasts of the amount of affordable housing likely to be delivered. A recent study in England found that 65% of councils are directly engaged in housing delivery themselves. Reasons include the need to accelerate the provision of homes, especially affordable homes, and to encourage local small builders, self-builders or co-operatives. Hope that the council will consider such engagement in the future. The impact of the abolition of Severn Bridge tolls on the housing market may require direct intervention.</p>	<p>Comments noted. Viability testing carried out by the Council's consultants during the preparation of the LDP did suggest that achieving the full percentages of affordable housing required by policy would be challenging on some of the strategic site allocations, e.g. Deri Farm in Abergavenny where the undergrounding of overhead electricity cables was resulting in considerable abnormal costs. Assessing the likely deliverability of any new site allocations will be an important element in the preparation of any revised LDP.</p>	No change to the RR.
39.1	Home Builders Federation	Neither Agree Nor Disagree	<p>Consider that the main issues are covered and note the detail in which this report covers these issues, however:</p> <p>Para 2.1.3 Delivery of Strategic Housing Sites - Suggest including a table showing all of the sites and their current position</p>	<p>Para. 2.1.3 Will add a reference to table 4 in Appendix 1.</p>	Change the RR where indicated in the LPA response.

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39.1			Para 2.1.4 Includes a statement 'many of which are independent of the planning system such as the wider economy and housing market'. This needs to be expanded and explained in more detail, both the wider economy and housing market are and have been at their strongest since the recession for the last few years	Para. 2.1.4 will add 'although both the wider economy and housing market have been at their strongest since the recession for the last few years'.	
39.1			Para 2.2 Contextual Changes - should include reference to the Arcadis Report 'Longitudinal Viability Study of the Planning Process'.	Para.2.2 Agreed, the Arcadis Report will be referenced in Section 2.2 of the RR, although the recommendations have not yet been translated into national planning policy guidance (PPW/LDP Manual).	
39.1			Para 2.2.11 Should be updated in view of Lesley Griffiths statement and letter to LPA's issued in December regarding joint working and SDPs.	Para. 2.2.11 Agreed. The RR will also be amended to further address the issues of joint working etc.	
39.1			Para 2.2.15 The wording regarding the economic performance of the area would seem to contradict the statement in 2.1.4.	Para 2.2.15 This paragraph is concerned with the employment market, economic activity etc. and not the wider economic conditions affecting the housing market. No change.	

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39.1			Para 2.2.16 The impact of the removal; of the bridge toll is likely to be greater than just on house prices, although the current wording doesn't say this, there is a risk that house prices will go up as demand grows unless more homes are built and demand is met.	Para. 2.2.16 Comment noted.	
39.1			Para 2.3 The revised plan period would go beyond 2021, as currently worded this section is misleading and only shows the impact of a change in the figures over the current plan period. There should be additional explanation of the figures over the replacement plan period to 2036.	Para 2.3 Comment noted. However the purpose of this section is to analyse the implications of the recent projections for the current plan period. What they say for any extended plan period would be a matter for any LDP revision. This will be clarified in Section 2.3 of the RR.	
40.1	Magor with Undy Community Council	Agree		Agreement noted.	No change to the RR.
41.1	Philippa Cole	Agree		Agreement noted.	No change to the RR.

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45.1	Bovis Homes Group (Lichfields)	Disagree	<p>Accept that the main issue to be considered in the LDP Review relates to housing; however it is important that this review is not undertaken in isolation of other matters which influence these e.g.in relation to housing requirement, PPW makes it clear that the latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the plan's evidence base but that other key issues also need to be considered, such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan. Specifically, a key omission from the LDP Review Report is the consideration which needs to be given to the economy and the Plan's alignment between homes and jobs. This is demonstrated by the omission of consideration of economic performance as part of the 'Review of LDP Strategy' section of the report. The review of the level of housing growth should have full regard to the economic opportunities associated with abolishment of the Severn Bridge tolls it will also be necessary to have regard to the wider context such as the Council's long term economic priorities and aspirations linked to the Cardiff Capital</p>	<p>Comments noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections, together with contextual issues such as City Deal and the abolition of the Severn Bridge charges, will be matters to be considered in any LDP revision. Other factors affecting the level of housing growth required will also be matters to be considered in any LDP Revision.</p>	No change to the RR.

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			Region City Deal and Future Monmouthshire.		
45.1			Careful thought also needs to be given to specific reasons why currently allocated sites have not progressed at the rate intended. This will clearly inform consideration of the location and scale of housing sites to be allocated in the future e.g. there are specific reasons why the proposed housing allocation (Land at Vinegar Hill, Undy, allocation reference SAH6), has not yet come forward - relating to the on-going M4 Relief Road CPO Inquiry. Particular consideration will need to be given to the level of flexibility allowance which is appropriate over the extended Plan period. Applying an appropriate allowance will be important for helping to ensure the Council maintains a 5 year housing land supply in the future by providing a range and choice of housing sites.	The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision. Paragraphs 3.3 .29-3.3 .35 of the RR refer to economic policy/ performance, with further analysis provided in the AMRs.	No cahnge to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1			<p>Note that one of the key issues that does not appear to have been addressed within the Review report is the current affordability problem. The 2015 Housing Market Assessment prepared by Monmouthshire Council indicates that the annual need is now 473.3 dwellings. The high annual requirement reflects the significant under delivery to date which will have had the effect of suppressing household formation relative to what it would have been if plan targets had been delivered. This is a significant change in circumstance since the adoption of the Plan worsened by the problems in delivery of sites. The report suggests that there are sufficient allocations to meet requirements however there are a number of inherent issues within the supply pool that has resulted in a less than five year supply of land for housing. Larger strategic sites inevitably have varying lead in time for development that must be factored into land supply. Given the lead in times it is important that there is a ready supply of smaller sites to make up for any short term shortfall. The present supply pool has not been able to deliver such an immediate supply of sites except for windfalls. The village sites subject to 60% affordable housing requirements may need to be subject to renewed viability appraisal. If this level of affordable housing is not viable then they should be developed at a level that is.</p>	<p>Comments noted. The RR recognises that there is a need to increase the supply of housing land and identifies that there is an issue regarding the failure to meet affordable housing targets. The Housing Market Assessment referred to by the respondent was undertaken using a different methodology to that used in the LDP process. The two methodologies are not directly comparable and it is incorrect to say that the annual need has increased. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1			<p>Given the supply side considerations there must be a flexible land supply to address short term requirements and also ensure that any constraints can be dealt with through the planning application process.</p>	<p>It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates, as well as wider contextual changes. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.</p>	<p>No change to the RR.</p>



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.1	Llanover & Coldbrook Estate (LRM Planning)	Disagree	<p>There are a number of issues that have arisen that are not fully reflected within the report. There has been new legislation in a number of areas (including the Planning Act), the report suggests that this could have a significant impact upon the strategy. However this has not altered Planning Policy in a substantive way that would require the overarching strategy of the plan to be changed. It is stated that a number of sites have not been progressing as quickly as anticipated due to the “wider economy and housing market”. It is highly unlikely that problems in economic performance or the housing market have impacted upon Monmouthshire, delays are more likely to be associated with site abnormalities, land owner intentions, lead in times, or development and policy constraints. The evidence of economic performance and demand suggest that there are no overarching economic / market led problems that would restrict growth.</p>	<p>Comments noted. The RR addresses recent legislative changes but does not suggest 'that this could have a significant impact upon the strategy' but that these are matters that require consideration. With regard to economic and market conditions it is recommended that a change be made to para. 2.1.4 (see Rep. no. 39.1).</p>	<p>Amend para 2.1.4 as in Rep. No. 39.1.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.1	Taylor Wimpey (Turley)		<p>Agree that housing provision and supply are key issues that need to be reviewed as part of the LDP Review. There is a very poor record of delivery and the current strategy is clearly not working. It is important that the shortfall in housing not be overlooked, the numbers involved reflect a lack in delivery of much needed housing to cater for the additional population needed to support the economy of Monmouthshire. A consequence of the shortfall in the delivery of market housing is the under delivery of affordable housing. Support the Council's intention that the reasons for lack of progress on strategic sites be investigated in order to understand why the key mechanism for delivering affordable homes (namely strategic sites) has failed. Additional deliverable sites in sustainable locations should be allocated to address both the market and affordable delivery issues. The Council argue that there are sufficient sites allocated to deliver a five year housing land supply, but that the issue is that they have not been coming forward as quickly as expected. Do not agree with this comment, as the severity of the shortfall in housing delivery and the extended delays on strategic sites is to a level that may mean the backlog is not made up within the plan period. If allocated sites are not capable of delivering the housing requirement then</p>	<p>Comments noted. The level of housing growth required will be a matter to be considered in any LDP Revision. It is not agreed that the LDP has a very poor record of housing delivery. All of the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than anticipated.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the Council cannot claim that there are 'sufficient' allocated sites. Throughout the Report there is a question regarding the deliverability of the identified strategic sites, and sufficient sites should now be found to ensure delivery and maintenance of a five year supply at all points in time. This does not mean allocating the bear minimum level of sites technically required to meet provision but rather sufficient above that level to ensure a five year supply is maintained.		
48.1	Llanarth Estates (WPM Planning)	Neither Agree Nor Disagree	It is agreed that the main issues have been identified and that housing is a significant issue, particularly the lack of housing delivered during the plan period to date.	Comment noted.	No change to the RR.
50.1	Mrs Evelyn Birden (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
51.1	Dr David Rosser (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
52.1	Morris' of Usk (WPM Planning)	Neither Agree Nor Disagree	It is agreed that the main issues have been identified and that housing is a significant issue, particularly the lack of housing delivered during the plan period to date.	Comment noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.1	Barton Willmore	Disagree	<p>Whilst the abolishment of the Severn Bridge tolls by the end of 2018 should not be underestimated there is a pressing need for the economic aspirations of the wider city-region, not least through the Cardiff Capital Region City Deal, to align with the level of housing provision within the Authority Area. Accordingly, whilst the Draft Review Report references the Welsh Government's 2014 household projections, it should be noted that, in line with PPW Para 9.2.2 that these 'should form the starting point for assessing housing requirements', they are projections that do not account for wider policy and economic considerations, which should be appropriately considered in any review of the LDP. Note and support that the Plan will need to be reviewed in line with the emerging update to Planning Policy Wales.</p>	<p>Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.1	Abergavenny Transition Town (Late Rep)	Disagree	<p>There is insufficient consideration of the relationship between employment issues and housing supply issues. There is an insufficient understanding of land/buildings allocated for employment. The standard employment space providers have no interest in what is the real complex demand of the future starter business that might lead to higher wage employment. There is no push to encourage Higher and Further education institutions to outsource and relocate departments in the area. The sectors of employment the LDP (and the Well being Plan ) assumes for growth, services, retail, tourism, agriculture etc are all low wage, casual, and often seasonal. There is a dissonance between that assumption and house prices/ supply.</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.1			<p>WG methodology of housing projections are deeply flawed and not a reliable basis for allocating housing land. This needs revision. That said the targets for housing supply in terms of land allocation anyway could have been met, and in fact are being met as the review says, ( para 3.2 .14, 3.2.16 and 3.2 .18) if it wasn't for a complexity of market failure, delays in delivering, due to landowners hanging onto site expecting bigger profits, delays in sorting 106 agreement, developers just sitting on land for housing because that keeps existing sale prices high and a whole host of other market complexities and inefficiencies. Bound up with this is a failure to deliver affordable housing to the % allocations expected (para 3.2 .11). English councils are starting to build council housing again, why is that not on the table in Monmouthshire. To rebalance the demographic small sites have to be found and compulsorily purchased, to provide more experimental housing delivery systems for that younger demographic. While on the issue of demographics it seems extraordinary given the massive change in the demographic of the elderly that nothing is said about the land to provide for, or the overall provision of suitable space standard retirement homes. Growing space from allotments to Community Supported Agriculture tied in with homes should find its way into the thinking on</p>	<p>Comments noted. The future level of housing growth will be a matter for any LDP revision. The failure to meet housing targets as set out in the current LDP does suggest that policies need to be revised. This could result in the release of more housing land or, conversely, a re-consideration of the housing targets in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. With regard to the provision of affordable housing, viability testing carried out by the Council's consultants during the preparation of the LDP did suggest that achieving the full percentages of affordable housing required by policy would be challenging on some of the strategic site allocations, e.g. Deri Farm in Abergavenny where the undergrounding of overhead electricity cables was resulting in considerable abnormal costs. Assessing the likely deliverability of any new site allocations will be an important element in the preparation of any revised LDP. The other matters referred to are generally matters to be considered in any LDP revision. Matters such as potential council house building, compulsory purchase</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the multi functional use of Open Space.	of land etc. are not matters for the LDP process. Current Green Infrastructure policies do support community growing etc.	
56.1	Monmouth Town Council (Late Rep)	Disagree	It was suggested that the projected growth in population and households in 2008 led to expressed projected need of 4000 dwellings in the county. But today the projected growth in 2014 and with an updated census the 4000 number of dwellings may be out of date. Given the local drivers on the removal of the bridge tolls demand may well exceed supply and therefore this should be revisited. It does not appear to be prudent not to revisit this and revisit the % of affordable social housing required by county on all new sites so that young people can get on the property ladder as property prices are rising and in a small rural town we need homes for young people within our towns. As a border town need to explore the links with LDP in the neighbouring border town as this impacts on the road infrastructure which is clearly evidenced by the third lane expansion on the A 40 and question the resilience of both our educational assessment of school places and the road resilience of the major arterial networks.	Comments noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision. With regard to affordable housing the DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out to ensure that affordable housing policy requirements are based on up to date information on development costs and values. Relationships with adjoining authorities will be a matter for consideration in the preparation of any revised LDP, as will infrastructure capacity.	No change to the RR.
57.1	Usk Town Council (Late Rep)	Agree	The Draft Review covers the key issues.	Agreement noted.	No change to the RR.

## Q2 (Section 3.1): Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.2	Chepstow Society	Agree	All the previous issues are desirable, so need to be carried into the next Plan and further developed.	Agreement noted.	No change to the RR.
3.2	Trustees of the Late Mrs H M Langham	Agree		Agreement noted.	No change to the RR.
4.2	Heine Planning	Neither Agree nor Disagree		Noted.	No change to the RR.
7.2	Mr Alan Horne	Agree		Agreement noted.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.1	Ann Langford	Agree	<p>Considers that that LDP should not be reviewed at this stage. The existing vision, issues and objectives of the LDP are still relevant – it is the number of proposed dwellings that needs to be revised in line with current forecasts. The LDP’s current housing requirement, at 450 dwellings per annum, is significantly higher than the 180/240 dwellings that are required according to the most up-to-date forecasts.(2.3.6). In effect it is the target number of dwellings that needs to be halved – around 200/annum seems much more reasonable.</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. It is noted that the respondent considers that the LDP vision, issues and objectives are still relevant but that the numbers of dwellings should be revised downwards in line with current forecasts. Reducing the housing target could only be done through a revision to the LDP. The fact that the recent population and household projections are indicating reduced numbers to those that the LDP was based on suggests a need to reconsider the LDP's strategy's level of housing growth. However, the appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.2	SA Brain & Co Ltd	Neither Agree nor Disagree	The existing LDP vision, issues and objectives remain relevant, they are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition the vision and objectives align with contextual changes that have taken place since the LDP's original adoption in February 2014. However, there is a need to add more flexibility into the Spatial Vision of the Plan, there should be more focus on delivering housing in the settlements outside the main towns to support the strategic allocations in this location and to ensure continuity of supply and a range of sites. A more flexible approach within the lower tier settlements will allow more sustainable and appropriate sites to come through and aid wider housing delivery, thereby allowing the LDP to meet its wider strategic objectives.	Comment noted. It is acknowledged in the RR (para. 3.1 .9) that the spatial element of the LDP Vision may require changing should the LDP spatial strategy be revised.	No change to the RR.
11.2	Mr Paul Cawley	Neither Agree nor Disagree	The current LDP objectives and the Local Well-Being Plan objectives are complementary to the seven goals of the Welsh Government's Well-Being of Future Generation Act.	Comment noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.2	RPS Planning	Agree	Support the LDP Spatial Strategy for focusing within the three main market towns. Abergavenny, in particular is considered to be a highly sustainable settlement capable of supporting future growth in line with LDP objectives and Well-Being goals. In progressing allocations for future residential development, MCC however needs to ensure that site allocations are suitable and deliverable. Land at Ross Road, Abergavenny should be considered through the LDP Review process, it does not fall within any restrictive landscape designation and is some distance from the National Park boundary. The site is considered to be suitable for future residential development.	It is noted that the respondent supports the current LDP spatial strategy. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
13.2	Ward Estates Ltd	Agree	In broad terms agree that the existing LDP vision, issues and objectives remain relevant for the revised Plan for Monmouthshire. They are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition also of the view that the vision and objectives align with contextual changes that have taken place since the LDPs original adoption in February 2014.	Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.2	Bovis Homes (RPS)	Agree	Support the LDP Spatial Strategy and focusing the delivery of development within the three main market towns followed by Severnside Settlements. These are sustainable settlements capable of supporting future growth in line with LDP objectives and Well-Being goals. In progressing allocations for future residential development, MCC however needs to ensure that site allocations are suitable and deliverable. However the LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable, including those which have an already proven track record for delivering housing, but also allocate further housing sites which are evidenced to be free of constraint, associated with an established developer and which can be proven to be realistically viable and deliverable.	Agreement noted.	No change to the RR.
16.2	Bovis Homes (Walsingham Planning)	Agree		Agreement noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
20.2	Hallam Land Management (Asbri)	Disagree	The adopted LDP, as a result of additional sites introduced at the Examination stage, allowed for a disproportionate level of growth in the Severnside settlements, despite the Strategy emphasis on the main towns. The Review will need to address this imbalance with a higher proportion of allocations in the market towns. Particularly in order to meet the Local Well-Being Plan objective – ‘Building Sustainable Communities’.	Comment noted. The respondent seems to support the current LDP spatial strategy, the main concern appearing to be that the final LDP allocations did not reflect this strategy, with a disproportionate amount of growth in Severnside.	No change to the RR.
21.2	Hallam Land Management (Boyer)	Agree	Agree in broad terms that the existing LDP vision, issues and objectives remain relevant for the revised Plan for Monmouthshire. They are topical issues that continue to be pertinent matters in the delivery of the LDP. In addition to this, also of the view that the vision and objectives align with contextual changes that have taken place since the LDPs original adoption in February 2014.	Agreement noted.	No change to the RR.
22.2	Redrow Homes	Agree	Severn Bridge Tolls, joint Severnside planning and City Deal could influence the LDP vision, issues and objectives too.	Agreement to current LDP vision, issues and objectives noted. It is recognised that the issues referred could influence the vision and objectives of any revised LDP.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.2	Richborough Estates (Turley)	Disagree	<p>The broad key issues identified in the adopted LDP remain, on the whole, relevant. Notwithstanding this, since the adoption of the LDP there have been a number of important contextual changes at a national, regional and local level. This includes significant changes to the national policy framework, market and economic factors and progression of the Cardiff Capital Region and City Deal. Other contextual changes include a commitment to remove the Severn Tolls at the end of 2018, which, given the strategic location of Monmouthshire, will be an important factor over the plan period. 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. Likewise, the 'vision' set out in the adopted plan was developed from a consultation exercise undertaken in 2008. The vision should be revisited to reflect the contextual changes and the extended plan period. The 'spatial implications' of achieving the LDP vision should also be updated and objectives reviewed in line with the key issues and vision.</p>	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
24.2	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	They remain relevant but the pending changes for Monmouthshire indicate that the review is already out of date.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
26.2	Cllr Louise Brown	Neither Agree nor Disagree	Aspects of the existing LDP vision are still relevant. However not enough account is taken of the health and well-being of residents in the planning process and in planning policy both in the LDP and nationally. Avoiding unneighbourly development needs to have far more policy emphasis e.g. not building in back gardens. Also concreting over areas has led to flooding in certain areas as there is less ground to soak up flash floods. The local planning policy has failed to fully take account of the wellbeing legislation in planning policy. In addition the prevention of residential development in flood Zone C2 needs strengthening, the LDP needs to have much greater emphasis on this aspect as well as underlying it with national planning policies such as TAN15. More emphasis needs to be placed in planning policy on looking at conditions to help mitigate development for neighbours.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. Any revised LDP would have to consider the Well Being of Future Generations Act.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.2	Llangybi Community Council	Neither Agree Nor Disagree	One of the strategic objectives in the Local Well-Being Plan is to reduce inequalities between communities. Rural communities are suffering from a poor infrastructure in terms of broadband, mobile signals and public transport which may be a factor in the significant shortfall in the housing target in rural areas. It should be noted that acceptable standards of broadband and mobile signal accessibility have increased significantly since the current LDP was adopted. Reductions in bus services are not compatible with the vision to 'reduce reliance on the private motor car '.	Comments noted. The importance of broadband connectivity is recognised although the LDP can have limited influence over this issue. Similarly, the LDP can have limited influence over bus service provision, although the current LDP put an emphasis on providing affordable housing for local people in rural areas of the County, notwithstanding limited public transport opportunities and having regard to the advice in TAN6 Planning for Sustainable Communities July: 'Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car' (paragraph 2.2.3)	No change to the RR.
31.2	Mr Adrian Lewis	Neither Agree Nor Disagree	The overall objectives remain the same, however the review appears not to have taken into account the sites that were not initially included in the LDP; including the Sudbrook Paper Mills Site. This was opposed by MCC until the Government Planning Inspector insisted on its inclusion to make up for past failures to meet housing targets.	Comment noted. The RR is a review of the adopted LDP - the site referred to is an allocation in the adopted LDP.	No change to the RR.
32.2	Mr Rees Williams	Agree	Agree, but with exception of housing/land objectives which have not been achieved so far.	Agreement noted. The RR recognises that there is a need to increase the supply of housing land.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
33.2	Abergavenny Town Council	Comment	<p>With regards to housing, the range and quality of the housing provided should be reviewed as part of the LDP revision. Affordable housing can still be out of the financial reach of many in Abergavenny, so truly affordable housing is required. Good quality housing is more sustainable in the long term. Again raise the need to ensure that there is sufficient focus on the historic nature of Abergavenny as a market town. Abergavenny is fortunate to have a railway station but there is concern that improving connectivity is largely focused on moving residents to their places of work. This is important but equally would like to see greater consideration in the LDP Review process to the creation of good quality, accessible employment sites in Abergavenny to decrease the need for travel.</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.2	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>The LDP vision was developed from public participation exercises that were carried out in 2008. It is considered that the intervening period of 10 years is substantial enough to warrant a review of the vision. Furthermore, it is considered that substantial policy changes have occurred since this period. PPW requires that in accordance with the Well-Being of Future Generations Act (2015) the Local Well Being Plan should provide a framework for the LDP vision. As such, it is considered that the current vision which was prepared in the context of the Community Strategy needs to be reviewed afresh as part of the full review of the LDP. It is considered that potential “tweaking” may not be appropriate in the context of complying with the requirements of the Well-Being of Future Generations Act. In addition to the Cardiff Capital City Region Deal, it is considered that the Draft Review Report should give consideration to the far-reaching impacts of the abolition of Severn Bridge tolls in terms of capitalising on South Wales / South West linkages. It is essential that the LDP considers how the two economies of the Cardiff Capital region and the West of England can work more closely as a coherent economic region in the future (which will have clear implications for the LDP’s vision and objectives).</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
37.2	Abergavenny & District Civic Society	Agree	But recognise that all three will need to be carefully reconsidered in the foreseeable future. Such a reassessment needs several years of evidence-gathering, discussion and negotiation.	Agreement and comment noted. While the existing vision, issues and objectives are still felt to be relevant and appropriate they would be reconsidered as part of any LDP revision.	No change to the RR.
39.2	Home Builders Federation	Neither Agree Nor Disagree	Suggest that this section needs to include some commentary on the City Deal and the impact of the bridge tolls being removed. (Note that these do get mentioned in later sections) . Due to Monmouthshire's strategic location in terms of the wider Severn Growth area there is also a need to include some commentary on the potential impact of being part of this is wider strategic area.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
40.2	Magor with Undy Community Council	Neither Agree Nor Disagree	The current LDP objectives and the Local Well-Being Plan objectives are complementary and conducive to the seven goals of the Welsh Government's Well-Being of Future Generation Act.	Comment noted.	No change to the RR.
41.2	Philippa Cole	Neither Agree Nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.1	Stephen Arnell		Things have moved on a long way since the start of the LDP, and the LDP revision must now try to imagine what is likely in the next years and decades. It is already apparent that there will be less travelling required, certainly to places of work and for shopping, reducing the use of the private car. Working from home via the internet is now widespread. Internet shopping continues to increase, and the use of delivery drones will reduce the need for delivery vans especially to rural destinations. This evidence means that the LDP Vision in para 3.1 .1 (3) 'reduced reliance on the private motor car and minimised impact on the environment' could soon be met, NOT by having to concentrate residential development around transport links but by technology thus allowing a more balance distribution of residential development between towns and rural locations.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
45.2	Bovis Homes Group (Lichfields)	Neither Agree Nor Disagree	The Vision, Issues and Objectives remain laudable statements of intent, however, given the time since they were first drafted and the new national and regional policy context it is appropriate to re-test them as part of a full plan making process.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.
46.2	Llanover & Coldbrook Estate (LRM Planning)	Disagree	The vision, issues and objectives remain relevant however will need to be updated.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.2	Taylor Wimpey (Turley)		No comment at this time on the proposed vision, issues and objectives.	Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.2	Llanarth Estates (WPM Planning)	Agree	<p>It is agreed that the issues identified in the current LDP are still relevant however there are emerging issues which should be added. The potential implications of the abolition of the tolls and its affect on the county and likely growth is considered to be a key issue going forward and should be taken into account in the future LDP. Whilst it will create is own issues it is also likely to have a direct impact on existing issues. The population is likely to increase as a result of the Severn Tolls abolition and migration from the English borders is likely to occur which will potentially increase the number of younger persons/families settling in the east of the authority due to the reduced housing prices in Mommouthshire in comparison to settlements on the English side of the Severn Bridge. Any review of the LDP should take full account of this especially in relation to potential population growth in the County. Spatial distribution of development should be reconsidered to facilitate the likely growth, especially in the east of the county. Additionally, the ability for growth in the rural main villages and minor villages should be facilitated to provide sustainable settlements whilst also easing pressure on main towns. Whilst the current LDP recognises the issue of maintaining</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			<p>services and facilities in rural areas it does not provide realistic policies which enable the implementation of controlled growth. The issues identified in respect to infrastructure should be amended to include the specific reference to rural areas. The issues in respect of employment do not recognise the sectors of employment and industry which dominate the County, for example, agriculture. Nor is it recognized that in light of the decline in the farming industry that alternative uses, diversification and employment opportunities need to be provided for. The lack of tourism accommodation and spatial distribution of tourism is not noted as an issue and it should be. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to the level and range of homes, rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:</p>		
50.2	Mrs Evelyn Birden (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
51.2	Dr David Rosser (Newland Rennie)	Neither Agree Nor Disagree		Noted	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
52.2	Morris' of Usk (WPM Planning)	Agree	<p>It is agreed that the issues identified in the current LDP are still relevant however there are emerging issues which should be added. The potential implications of the abolition of the tolls and its affect on the county and likely growth is considered to be a key issue going forward and should be taken into account in the future LDP. Whilst it will create is own issues it is also likely to have a direct impact on existing issues. The population is likely to increase as a result of the Severn Tolls abolition and migration from the English borders is likely to occur which will potentially increase the number of younger persons/families settling in the east of the authority due to the reduced housing prices in Mommouthshire in comparison to settlements on the English side of the Severn Bridge. Any review of the LDP should take full account of this especially in relation to potential population growth in the County. Spatial distribution of development should be reconsidered to facilitate the likely growth, especially in the east of the county. Additionally, the ability for growth in the rural main villages and minor villages should be facilitated to provide sustainable settlements whilst also easing pressure on main towns. Whilst the current LDP recognises the issue of maintaining services and facilities in rural areas it</p>	<p>Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives.</p>	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.2	Barton Willmore	Neither Agree Nor Disagree	<p>does not provide realistic policies which enable the implementation of controlled growth. The lack of infrastructure in rural Monmouthshire directly impacts on the settlement</p> <p>pattern and the implications this has in terms of delivering development, especially in rural areas. The issues identified in respect to infrastructure should be amended to include the specific reference to rural areas. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:</p> <p>Overall, it should be noted that should any changes be made to the Plan in response to the comprehensive review of the main issues for consideration, the LDP's vision, issues and objectives would need to be updated to reflect these changes.</p>	<p>Comment noted. It is recognised that should the strategy and its aims change in any LDP revision the vision, issues and objectives are likely to require amending to correspond.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
56.2	Monmouth Town Council (Late Rep)	Disagree	The LDP vision may still be relevant but major changes in the National Planning Framework remain unclear as does the real impact of the Regional plans around the Cardiff Capital Regional City Deal. Mineral planning and the impact of fracking need to be considered and this section updated as although not within our geographical boundary may impact from the neighbouring counties.	Comment noted. If a decision is made to revise the LDP, this will include revisiting the vision, issues and objectives. The Welsh Government has issued a clear policy position opposed to fracking, however, neither that nor the Monmouthshire LDP can influence the approach taken to fracking in neighbouring English authorities.	No change to the RR.
60.1	St Arvans Community Council (Late Rep)	Agree	Since current objectives have not been achieved there is little use in carrying out a full review.	Agreement noted.	No change to the RR.

## Q3 (Section 3.2): Do you agree that the adopted LDP Spatial Strategy is functioning effectively?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.3	Chepstow Society	Disagree	Too much emphasis on "windfall" sites, so taking away from green spaces, gardens, etc, this cannot work long term. If supply of building land falls short of Government requirements it might mean approvals by Planning Inspectors in circumstances not currently thought desirable.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.
3.3	Trustees of the Late Mrs H M Langham	Disagree	Para 3.2 .2; states that "it would appear that in general LDP policies are functioning effectively". This is not so, specifically in main Villages, as evidenced in 3.2 .14 where it states that "only one site has been delivered to date" out of 19. 3.28 refers to the "[slow] speed at which sites allocated in the Plan are coming forward, as do 3.2.10 and 3.2 .11, which refer directly to Main Village allocations.	The RR (e.g. paras. 3.2 .14) acknowledges that there is a need to give further consideration to the reasons for the non-delivery of Main Village sites, including unrealistic landowner expectations. This could lead to de-allocation of some sites in any revised LDP.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
4.3	Heine Planning	Disagree	<p>The Spatial strategy is clearly not working due to the failure to make proper and adequate assessment of the:</p> <p style="padding-left: 40px;">a) Need for Gypsy and Traveller pitches</p> <p style="padding-left: 40px;">b) Allocation of sites to meet existing need</p> <p style="padding-left: 40px;">To inform current policy</p>	The LDP spatial strategy is concerned more with the general distribution of development rather than with specific issues such as the need for gypsy and traveller sites, although the RR recognises that this matter will need further consideration in any LDP revision.	No change to the RR.
7.3	Mr Alan Horne	Neither Agree nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.2	Ann Langford	Agree	<p>Considers that that LDP should not be reviewed at this stage. The spatial strategy appears to be working. The tone of the report however seems to be all about the failure of the plan to deliver the target of 450 dwellings per annum. But this target is completely unrealistic based on current population and household growth projections. The target should be based on need, which implies a level of around 200 dwellings/annum. The failure of this section of the report to acknowledge this fact is a major weakness in the report, and in the consequent conclusions. Revising the target to account for more up-to-date forecasts reveals that the current plan is delivering what is required. Figure 6 (3.2 .5) demonstrates that the dwelling completions is about on target of 200/annum. The land supply calculations using the residual method is completely invalid if this target of 450 dwellings per annum is used.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is functioning effectively. Concern is expressed, however, that the RR does not suggest that the housing target needs to be reduced to conform to more recent projections. To state this would be to prejudge a matter that should be dealt with in any LDP revision. The RR acknowledges the fact that the recent population and household projections are indicating reduced numbers to those that the LDP was based on and that this suggests a need to reconsider the LDP's strategy's level of housing growth. However, the appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			The 60% affordable housing contribution is excessively high for lower tier settlement allocations. There is a significant need and priority to deliver affordable housing within Monmouthshire, but need to reconsider the percentage required for exception sites. With a reduction in the requirement for affordable housing improving the viability of such sites coming forward it would enable more development to meet local housing need and supply within the main villages.	The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
9.3	SA Brain & Co Ltd	Neither Agree nor Disagree	There has been a failure of strategic sites to deliver as anticipated which has led to an under provision of housing during the first part of the plan period, this has been masked by a significant number of windfalls. The Spatial Strategy has failed due to its overreliance on the delivery of the Strategic Sites. This over-reliance together with insufficient flexibility in the LDP to allow for other sources of housing to come forward has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			<p>Paragraph 3.2.20 states that due to the inability to meet the LDP housing requirement and the resulting failure to maintain a 5 year housing land supply, the level of housing growth will have to be reconsidered as part of the revision to the LDP. In doing this, it should be recognised that the failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on strategic sites which have failed to come forward for development and whatever the housing target in the LDP Review there should be sufficient flexibility in the land supply to ensure that the target is met. Commend the Council in taking a pragmatic approach in approving two recent residential planning applications it is felt that such an approach should be adopted to other housing sites that have the potential to deliver immediately within sustainable locations. Also agree that all the undelivered housing allocations need to be re-assessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated.</p>	<p>Comments noted, although it is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.3			Consider that Land adjacent to the Piercefield, St Arvans, is a suitable site as an allocation for the LDP Review to provide and support the strategic allocations in terms of providing a range of different locations that are also viable. Housing to meet local needs within lower tier settlements, within the local plan, is provided for via exception sites (Policy S4 and H7) where such schemes could come forward with a high percentage of affordable housing provision. There has been a lack of delivery in these exception sites due to viability issues. The approach to the affordable housing exception sites needs to be reconsidered and an element of flexibility applied.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
11.3	Mr Paul Cawley	Disagree	The current LDP is too reliant on the spatial development of the larger 'main town' developments. The Authority needs to consider the development of smaller 'secondary' and 'rural' areas. Land available (new, or that which missed inclusion in, or rejected by the current LDP) should be considered to cover any shortfall in the number of houses required across the whole of Monmouthshire.	It is noted that the respondent considers that the LDP spatial strategy not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.3	RPS Planning	Agree	<p>Support provided to strategy of focusing the delivery of development within the three main market towns but it is clear from the 2016 and 2017 Annual Monitoring Reports that despite housing sites being allocated, a shortfall in housing land supply has still occurred. The LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable but also allocate further housing sites which are free of constraint and are realistically viable and deliverable. The LDP review needs to not only accommodate the future projected population and housing growth requirements over the plan period but also factor in the current undersupply due to allocated sites not coming forward at the expected rates. The current slower than anticipated delivery evidenced within the 2016 and 2017 AMR's confirms the need for additional allocations through the LDP review.</p>	<p>It is noted that the respondent supports the current LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy. The RR acknowledges a need for additional housing sites. The level of housing growth required will be a matter to be considered in any LDP Revision, although it is not necessarily agreed that any current undersupply should be factored into any revised LDP targets, which, it is believed, should start afresh from the base date of any new plan, taking into account need as it stands at that start date.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.3	Ward Estates Ltd	Neither Agree nor Disagree	Agree that in relation to those dwellings that have been completed to date the LDP spatial strategy in broad terms is being followed. However this has occurred despite there being a failure of strategic sites to deliver as anticipated which has led to an underachievement in Severnside Settlements whilst in the Main Towns a significant number of windfalls has made up for the non-delivery of strategic sites leading to an over achievement of the spatial strategy. Failure of the Spatial Strategy in relation to housing delivery due to overreliance on the delivery of the Strategic Sites this together with insufficient flexibility to allow for non-delivery has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. It is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.3			<p>Para 3.2 .20 states that due to the inability to meet the LDP housing requirement and to maintain a 5 year housing land supply the level of housing growth will have to be reconsidered as part of the revision to the LDP. In doing this it should be recognised that the failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on strategic sites which have failed to come forward for development. The suggestion in para.3.2 .17 that if past building rates were used to determine the land supply instead of the residual method it would result in a 11 year supply of housing land is totally inappropriate as this would result in the continual under supply of housing provision to meet the LDP requirement.</p>		
13.3			<p>Commend the Council in taking a pragmatic approach in approving two recent residential planning applications, Iso agree that all the undelivered housing allocations will need to be reassessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated. With regard to new sites consider that the land shown on submitted plan should be included as an allocation in the LDP Review.</p>	<p>The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
15.3	Bovis Homes (RPS)	Agree	Whilst support the Spatial Strategy and focusing the delivery of development within the three main market towns , it is clear from the 2016 and 2017 Annual Monitoring Reports that despite housing sites being allocated, a shortfall in housing land supply has still occurred. As such, the LDP review not only needs to support the delivery of allocated sites which are proven to be suitable and deliverable, including those which have an already proven track record for delivering housing but also allocate further housing sites which are realistically viable and deliverable.	It is noted that the respondent supports the current LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy and for assisting existing allocations to come forward. The RR acknowledges a need for additional housing sites.	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 revision or a full revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.3			<p>In terms of the future level of Housing Growth, the LDP review needs to not only accommodate the future projected population and housing growth requirements over the plan period but also factor in the current undersupply due to allocated sites not coming forward at the expected rates. The current slower than anticipated delivery evidenced within the 2016 and 2017 AMR's confirms the need for additional allocations through the LDP revision. It is also considered that the 2014 populations projections cannot be relied upon within the LDP review. Due to the length of the plan period (up to 2036), the 2014 population projections will be out of date to cover the next 18 years. Accordingly, the evidence base used to revise the dwelling requirement over this extended time will have to be carefully considered with enough flexibility included to allow for any changes in circumstances. In addition the housing requirement also needs to consider regional dynamics and the possibility of extending the "duty to cooperate" to the west of England.</p>	<p>The level of housing growth required will be a matter to be considered in any LDP Revision, although it is not necessarily agreed that any current undersupply should be factored into any revised LDP targets, which, it is believed, should start afresh from the base date of any new plan, taking into account need as it stands at that start date.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			<p>A significant proportion of dwelling completions in the main towns have arisen from windfall sites. Windfall sites are unlikely to deliver affordable housing at levels that allocated strategic sites will achieve, and this in part is likely to be a contributory factor to the affordable housing delivery deficiencies in the County. The one LDP strategic housing allocation that is proposed at Chepstow comprises contaminated, previously-developed land and consequently it is not expected to deliver affordable housing anywhere near the target level exacerbating the problem of affordable housing delivery in the town.</p>		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			<p>The Review Report suggests that the level of housing growth required by the LDP's strategy will need to be considered as part of a revision of the LDP. However, strongly caution against any short term (eg. through a short form revision) re-adjustment downwards, as affordability will become a greater problem in Monmouthshire if supply is curtailed. The only effective way to address the difficulties that the the Plan has faced in delivering sufficient housing is to allocate additional strategic sites, particularly at towns such as Chepstow where housing demand is likely to increase as the Severn Bridge tolls are phased out, and new economic opportunities arising from initiatives such as the South East Wales Metro. This should take place through a full revision of the Plan.</p>		
16.3			<p>As a consequence of limited delivery from allocated strategic housing sites, Monmouthshire has not achieved a 5-year supply of land for housing for the years 2015/16 and 2016/17. The residual method for calculating housing land availability/supply set out in TAN1 is of course current policy and the (only) accepted method for delivering the requirement to maintain a 5-year supply of readily developable housing land.</p>		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			Affordable dwelling completions are significantly lower than the identified LDP target, do not believe that the LDP's affordable housing requirement will be met by the end of the current Plan period.		
16.3	Bovis Homes (Walsingham Planning)	Neither Agree Nor Disagree	The spatial strategy in the adopted LDP correctly seeks to focus the majority of residential development in the County's main towns with a smaller amount of new housing development provided within the Severnside area and Rural Secondary Settlements. It is evident that the spatial distribution of growth to date is broadly in accordance with the planned percentage distribution as set out in Policy S2. However, the delivery of housing to meet the adopted housing requirement is also a key element of the spatial strategy. It is clear from the evidence in the Review Report that the spatial strategy is not functioning effectively, particularly with regards to affordable housing.	It is noted that the respondent supports the LDP spatial strategy, the main concern appearing to be the need for additional sites that accord with this spatial strategy. The RR acknowledges a need for additional housing sites. The level of housing growth required will be a matter to be considered in any LDP Revision. The suitability, or otherwise, of any potential candidate site will be a matter for any LDP Revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.3			There has been limited progress with the delivery of the allocated strategic housing sites. The Review Report recognises that the delivery of strategic sites is a crucial element in the delivery of the housing strategy. We agree and see no justification in reviewing the deliverability of outstanding strategic allocations. However, the fact that for various reasons they are taking longer to come forward means that additional sites will need to be identified as part of a full revision of the LDP.		
20.3	Hallam Land Management (Asbri)	Disagree	The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply against the prescribed residual method should not be used as a reason to reduce future levels of housing growth on the basis of past building rates as this ignores low delivery rates experienced during the last 10 to 15 years which reflected factors which included the recession, and the limited choice of sites available in the years prior to the adoption of the LDP. The pragmatic approach in allowing recent planning applications is welcomed. In addition the Council's flexibility in relation to viability and affordable housing reduction as highlighted in paragraphs 3.3 .6 to 3.3 .7 is supported.	Comment noted. The level of any future housing growth will be a matter to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.3	Hallam Land Management (Boyer)	Neither Agree nor Disagree	Agree that in relation to dwellings completed to date the LDP Spatial Strategy in broad terms is being followed. However, this has occurred despite there being a failure of Strategic Sites to deliver as anticipated which has led to an underachievement in Severnside Settlements, whilst in the Main Towns, a significant number of windfalls has made up for the non-delivery of Strategic Sites leading to an over achievement of the spatial strategy. The over-reliance on strategic sites together with insufficient flexibility in the LDP to allow for non-delivery has led to a shortfall of completions.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. It is not agreed that the reliance on strategic sites is the sole reason for the housing targets not being met. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision. RR to be amended to acknowledge that there is an overreliance on strategic sites and associated lack of flexibility in the adopted LDP.
21.3			The failure to deliver the housing strategy is not due to a lack of demand or need for housing in Monmouthshire but due to the over reliance on Strategic Sites which have failed to come forward for development and whatever the housing target in the LDP Review there should be sufficient flexibility in the land supply to ensure that the target is met. The suggestion in paragraph 3.2 .17 that if past building rates were used to determine the land supply instead of the residual method, resulting in a 11 year supply of housing land, is totally inappropriate as this would result in the continual under supply of housing provision to meet the LDP requirement.		

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.3			Commend the Council in taking a pragmatic approach in approving two recent residential planning applications to make up the shortfall in the housing land supply. Also agree that all the undelivered housing allocations will need to be reassessed to ensure that they remain viable and deliverable and that this could result in existing housing allocations being removed from the LDP and new sites allocated. In this regard, consider that the Land West of Rockfield Road1 should be included as an allocation in the LDP Review.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	
22.3	Redrow Homes	Agree	The spatial strategy adopted in the LDP is considered to have been robust and effective. Looking forward the impact of the removal of the Severn bridge toll costs need to be carefully considered together with SDP progression, city deal etc. Consideration will need to be given to the increased demand for housing and fluidity of movement for employers and employees.	It is noted that the respondent supports the LDP's existing spatial strategy. The issues referred to will be taken into account in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.3	Richborough Estates (Turley)	Neither Agree Nor Disagree	<p>Whilst the principles of the spatial strategy are broadly supported, the delivery of housing to date indicates that there is a need to adopt greater flexibility and identify additional site allocations. Strategic sites identified through the LDP have, in the main, failed to progress at the rates anticipated. The failure to balance housing supply with demand over the plan period is a result of a number of factors. It is accepted that this goes beyond the spatial strategy alone. The current housing supply position does, however, support the need to review the spatial strategy, it should provide greater flexibility in relation to land identified and allocated in the LDP. The Council's approach to the interim supply of housing demonstrates the benefits of adopting flexibility to boosting the delivery of housing land. In terms of the spatial strategy, there is scope for increased delivery within the Rural Secondary Settlements, whilst maintaining a focus on the three main towns. It is also important that the spatial strategy is reviewed in respect of both the extended plan period and contextual changes since the adoption of the LDP. This should include consideration of the implications of factors such as the aspirations associated with the Cardiff Capital Region City Deal and opportunities associated with the abolition of the Severn Tolls.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively, although there is also concern that the delivery of housing land is inadequate. The RR recognises that the spatial strategy may require revising and that additional housing allocations are required.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
24.3	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	As a review is deemed necessary, the Spatial Strategy cannot be functioning effectively. The original LDP was flawed by not considering possible changes in the housing market and the wider economy before allocating development sites. Site viability should have been taken into account and perhaps a penalty introduced for undelivered site allocations. The number of houses allocated to be built on any one site (together with statutory numbers of affordable housing) should be enforced. As not all allocated sites are being developed, it is cavalier of the Council to state that it will select other sites - ostensibly at will. This poses a huge threat to the green wedges which give Monmouthshire its character and refutes the statement in the summary that Policy S13 is functioning effectively. It will be also be detrimental to the tourist industry.	Comments noted. These are matters generally to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.3	Cllr Louise Brown	Agree	<p>Agree, except far more emphasis should be placed upon getting the population projections right. Opposed to additional sites being considered as current allocated sites should be left where they are and reviewed properly. If there is a lower population projection then the current sites should be sufficient without the need to consider any additional sites. In relation to main villages it is very important to maintain the village boundaries and not to extend them. The policy of having a maximum of 15 in relation to the main villages was ignored in relation to one site on Pwllmeyric Hill. The policy needs to be drafted in such a way to ensure that this includes any land in the vicinity of the site, otherwise the policy of a maximum number of 15 is meaningless and leads to overdevelopment in main villages. It may be that other factors such as the percentage of affordable houses in main villages is too high and possibly 50% rather than 60% should be considered, this needs to be properly reviewed rather than looking for any unnecessary additional sites. It is important that affordable housing is provided on site not as an offsite contribution as this does not help with the needed provision in the main villages.</p>	<p>Comments noted. Reducing the housing target could only be done through a revision to the LDP. The appropriateness, or otherwise, of the more recent Welsh Government population and housing projections will be an issue to be considered in any LDP revision. The DDR does highlight (reflecting the findings of the last two LDP Annual Monitoring Reports) a need for identifying additional housing sites, contrary to the views expressed by the respondent. This is considered sufficient reason to justify a revision of the LDP. The location and scale of any new housing allocations would be a matter for any LDP revision. With regard to the comment on the Main Village affordable housing policy, the RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. The detailed wording of the affordable housing policy is a matter that can be considered in any LDP review.</p>	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
28.3	Llangybi Community Council	Disagree	Given the results so far, it is difficult to understand the statement that the residential development in Main Villages is 'functioning effectively' (Appendix 1, Table 2). Any proposal to introduce new housing sites (as per 3.3 .20) needs a full-scale consultation including WAG Inspectorate hearings especially if changes to VDBs (Village Development Boundaries) are to be proposed.	The respondent appears to be referring to the comment on Policy H2, Residential Development in Main Villages. This is a general Policy that is considered to be operating effectively but the RR does identify that there are issues with Policy SAH11 in that Main Village allocations are slow in coming forward. In this respect, the RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. Any changes to village development boundaries will be subject to community consultation as part of any LDP revision.	No change to the RR.
31.3	Mr Adrian Lewis	Neither Agree Nor Disagree	So long as any build respect the right of individual privacy, particularly any new build adjacent to existing developments.	Comment noted.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
32.3	Mr Rees Williams	Disagree	In terms of housing /land objectives these are not being achieved. In Table 1 Main Towns -Spatial Distribution of Housing Growth, the % Housing Growth Achieved is based on projected figures not actual completions and is , therefore, much lower in real terms.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively, particularly in relation to housing supply. The RR recognises that there is a need to increase the supply of housing land. To clarify Table 1 shows sites with extant planning permission for residential use at 29/11/2017 and residential completions 01/04/2011-31/03/2017.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
33.3	Abergavenny Town Council	Comment	<p>The lower number of dwelling completions could be construed as the LDP not functioning effectively but appreciate that the decisions of developers is outside of the remit of the Planning. Would request that the affordable housing threshold of 35% on new sites in the main towns is strictly adhered to and that developers are not able to meet the requirement with off-site contributions. Somewhat confused that allocations for housing are made in the plan yet large windfall sites make up the majority of completions in the main towns – why are these windfall sites not identified as part of the LDP process? Residential development via windfall sites undermines the reason for identifying sites in an LDP. Welcome the strengthening of retail policies to ensure the continuation of a vibrant and viable town centre. Note the reference to a Retail Expenditure Forecasts Study. Is this broken down by town and if so is this something that can be shared with the Town Council and local Business Community?</p>	<p>Comments noted. With regard to the point about affordable housing percentages, further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values. The Retail Expenditure Forecasts Study can be made available to the Town Council.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
34.2	Barratt David Wilson Homes		Paragraph 3.2 .20 suggests that existing housing allocations will not be carried over to the next LDP without re-assessment of their viability and deliverability. Supportive of this approach and consider that new and deliverable sites should be brought forward in place of these stalled sites which are having a detrimental impact upon the Council's housing land supply.	Comment noted. The RR acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations.	No change to the RR.
34.2			Paragraph 3.2 .9 identifies protracted viability discussions between developers and the Local Planning Authority as one of the reasons for reduced housing delivery in the County. In order to combat this greater emphasis needs to be placed upon the viability and deliverability of sites at the LDP stage in order to ensure that the most appropriate and deliverable sites are progressed as residential allocations.	Comment noted. These are matters to be considered in any LDP revision.	No change to the RR.
34.2			In terms of the delivery of affordable housing, welcome the increase in ACG figures (which will have a positive impact upon the delivery of affordable housing) it should be recognised that tenure neutral housing has a major impact upon overall viability and the percentage of affordable housing that is capable of being delivered. Through the LDP Review process, a thorough and robust review should be undertaken of the affordable housing requirement in Monmouthshire.	Comment noted. The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.3	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>It is considered that in order to address the under-supply of housing in the County, the spatial strategy must be revisited as part of the LDP review, particularly in light of the extended plan period. The need to reassess the spatial strategy is further emphasised by the potential implications of the removal of bridge tolls and the impending further increase in pressure on housing land, particularly in the south/east of the County. It is not considered that a sufficient amount of deliverable housing land is available within the existing settlement boundaries of the main towns / Severnside Settlements to accommodate the scale of new allocations required, necessitating a review of settlement boundaries and countryside/green wedge designations accordingly. Windfall sites within the main towns are already contributing a significant proportion of completions and in light of the above, it is considered that additional land needs to be released for housing on land adjacent to the main towns. It is considered that utilising wider economic/market conditions to justify the under-performing housing land supply position, underplays the fact that the LDP housing allocations are not coming forward for development and are essentially undeliverable. Conversely the adjoining Authority of Newport, which has experienced comparable</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. The RR also acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations. It is not agreed that the LDP strategic sites are 'essentially undeliverable' and an analysis of the progress of these sites does not evidence that version. All the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than is desirable.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
37.3	Abergavenny & District Civic Society		<p>economic/market conditions, has maintained its five year housing land supply. Non delivery of allocated sites evidences the need for the Authority to flexibly permit housing on non-allocated sites that are otherwise acceptable in planning terms. Agreed necessary to reassess existing allocations and in addition to undertake a comprehensive reassessment of the spatial strategy including release of land outside settlement limits / potential de-allocation of green wedge land to address the current and potentially worsening housing supply position.</p>	<p>Comment noted. The respondent makes reference to a 'revised need' based on the most recent Welsh Government projections. This would be a matter to be considered in any LDP revision. The most recent projections are not the only factors to be considered in establishing any revised housing targets and it should not be taken for granted that they will be unreservedly taken on board in any revised LDP.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .18 Factors affecting housing delivery and land supply have been discussed at length, however misses one of the most important ones, the fact that allocated sites, many owned by the Council, have not come/been brought forward as quickly as planned.	Para. 3.2 .18 This point is not understood. The paragraph is highlighting that the reasons for sites not coming forward is a result of a number of factors in combination.	
39.3			Para. 3.2 .20 The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply are not in themselves a reason to reconsider the level of housing growth. The 5 year land supply as set out in TAN1 is only a monitoring tool it does not affect either the need for or the delivery of homes.	Para. 3.2 .20 This is considered to be a reasonable point to make in the RR - the current housing supply problems do suggest that housing targets need to be re-considered to assess if they are appropriate or not. This would be a matter to be addressed in any revised LDP, along with consideration of the need for any additional housing allocations.	
39.3			<p>Para. 3.2 .15 Table 2 the column showing past build rates should be removed as it is not a calculation method allowed by TAN1 so serves no purpose in the document.</p> <p>Para. 3.2 .17 Contend that this is not the appropriate document in which to challenge the WG guidance in TAN1 on 5 year land supply calculations and that section 3.2 .17 should be removed.</p>	Paras. 3.2 .15-17 Not agreed. It is considered to be reasonable to highlight difficulties being caused by the method of calculating 5-year land supply, a matter that needs to be addressed at government level and in forthcoming LDP revisions of Welsh LPAs.	
39.3			Paras. 3.2 .11 – 3.2.13 – HBF suggests that an appendix be included to show the breakdown of where affordable housing has been delivered.	Paras. 3.2.11 - 3.2 .13 This information is considered to be excessive detail for the RR. Information on affordable housing achievement is set out in the AMRs and in para 3.3 .6 of the RR.	

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .10 Question whether there is any evidence to support the statement that there is enough land allocated and with planning permission to achieve a 5 year land supply, remembering that any such planning permissions need to be 'implementable'.	Para. 3..2.10 This statement is factually correct.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.
39.3			Para. 3.2 .8 Table 4 Appendix 1 should include details of the land ownership of the sites. The text should also include an explanation that a number of the Strategic sites are in Council ownership and their progress has been delayed by the Council.	Para. 3.2 .8 It is not considered necessary to include any further analysis of the reasons for the delay in strategic sites coming forward. This is expanded on in the Annual Monitoring reports.	
39.3			Paras 3.2 .6- 3.2 .9 In terms of the number of homes delivered a comparison with Newport a neighbouring Authority should be made as they have maintained a five year land supply. Their plan has the same start date 2011 and was adopted a year later than Monmouth and has delivered 1823 units or 911 units per year over the two years since the plans adoption.	Paras 3.2.6 - 3.2.9 Comments noted. The reasons for the differences between housing delivery in Monmouthshire and Newport will be set out in the RR.	The reasons for the differences between housing delivery in Monmouthshire and Newport will be set out in the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			Para. 3.2 .5 Questions the relevance of build rates over the last 35 years, if this section is to be retained greater explanation needs to be given as to the factors influencing the figures rather than just referring to economic trends, for example the number of house builders and the shift from homes being built by SME's and Councils to a higher reliance on a smaller number of larger house builders.	Para.3.2.5 It is considered reasonable to highlight the fact that the current LDP housing targets considerably exceed past build rates in the County. The implications of this will be a matter to be addressed in any revised LDP, although it is recognised that this will be one of many factors influencing potential housing targets.	
39.3	Home Builders Federation	Neither Agree Nor Disagree	Para. 3.2 .1 Suggest that additional commentary is required with regard to the impact of the removal of the bridge tolls, as this is likely to have an impact on demand for housing particularly in the east of the County.	Para 3.2 .1 The DDR points out the issues arising from the removal of Severn Bridge tolls. Detailed assessment of their potential impact would be a matter for any LDP review.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.3			<p>Para. 3.2.9 Consider that the report gives an unbalanced view of the factors at play, the economy has been out of recession for a number of years and an adjacent authority (Newport) which has seen a significant number of homes being delivered. In terms of viability negotiations with developers delaying sites this is partially as a result of the policies within the plan setting targets which make sites unviable or S106 requests which exceed those accounted for in the plans viability assessments. A detailed study of the viability issues of delayed sites should be undertaken to establish whether or not the plan can be amended in any way to reduce the likelihood of them being needed and therefore help speed up delivery.</p>	<p>Para. 3.2.9 All the LDP strategic sites are being developed or coming forward for development, although the RR acknowledges that this is taking place more slowly than is desirable. Careful consideration has been given to the viability implications of Section 106 requirements on planning applications for strategic sites and where necessary affordable housing policy requirements have been relaxed (although full policy requirements have been achieved in many cases as highlighted in para. 3.3 .6 of the RR) or other section 106 requests reduced. It is not agreed, therefore, that delays are ' as a result of the policies within the plan setting targets which make sites unviable or S106 requests which exceed those accounted for in the plans viability assessments', although it is recognised that any site allocations in any revised LDP will need much more rigorous examination of their deliverability, having regard to policy requirements.</p>	



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
40.3	Magor with Undy Community Council	Disagree	<p>The current LDP is too reliant on the spatial development of the larger ‘main town’ developments and that of the ‘Sevenside’ area. Need to consider land now available in secondary or rural areas so that small to medium size development clusters eg 10 – 20 dwellings can be built where a percentage of affordable housing would allow the younger generation to remain in the area they were brought up in, and possible close to family. Currently appears that large landowners/developers put forward areas of land for development and inclusion in the LDP but may not have any intention of developing that land during the lifespan of the current LDP eg. Bovis Homes submitted 225 dwellings at Vinegar Hill, Undy which is included in the Sevenside Spatial development – part of the proposed site they do not even own at present. Need to ask how long will it take to negotiate the purchase of the land, consult under the new Wales Planning Law, submit planning, agree s.106 etc? Would this all be achieved within the LDP lifespan? Need to re-consider the ‘Residential Site Allocation – General Matters Strategic Sites’ the ‘Strategic Policy 3 Strategic Housing Sites’ and the ‘Development Management H1’.</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
41.3	Philippa Cole	Disagree	The spatial strategy places a great deal of emphasis on the delivery of strategic sites within the plan period. These have not come forward for a variety of reasons but in part due to the spatial proximity of the allocated sites in the southern part of the borough. The Rural Area is currently meeting its target in restrictive circumstances suggesting demand for sites in these areas particularly from small and medium sized developers that the Welsh Government is keen to engage in the LDP process.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.2	Stephen Arnell	Disagree	<p>Paras 3.2 .1 and 3.2 .2 still accept that the strategy aim of focussing the majority of residential development in the main towns 'where there is best access to services and transport' is still valid. This is despite the already overwhelming evidence that the private motor car will soon not be a problem and that a lot of services will be able to be delivered in a different way reducing the need for the individual to travel. 3.2 .1 goes on to say 'with some development in the main villages only in order to meet local affordable housing need.' This needs to be re-addressed as it is now possible in the light of the above evidence to re-distribute housing to the more rural locations and villages which will give more choice. This is particularly important in villages with a school if the school is to be supported. The older generations are living longer it is essential that villages are allowed to grow and to maintain the inter-generational mix.</p>	<p>Comments noted. It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
42.3	Stephen Arnell		<p>Abolishment of Severn Bridge Tolls is likely to be one of the biggest issues affecting the LDP and its aspirations to improve life for those in Monmouthshire, but gets little mention and no analysis. Whilst it is mentioned in para 2.2.16, it is only in the context of impacts on house prices. Would assume that the removal of the tolls was in part to encourage inward investment into Monmouthshire. The opportunity must be fully grasped in order to improve the employment opportunities and housing aspirations of present and future generations and to meet the requirements of the LDP Vision, the Well-being of Future Generations Act, 2015 and the Housing (Wales) Act, 2014. In order to achieve this, businesses must be encouraged to locate in Monmouthshire and this will not happen unless there is a mix of housing types and locations both urban and rural. The insistence on urban densities of 30 dwellings per hectare in village locations is a flawed requirement. It stifles choice, and this along with the 60% requirement for affordable housing adds to the problems of viability. Nationally population is growing and Monmouthshire should take its share.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
45.3	Bovis Homes Group (Lichfields)	Agree	<p>The LDP spatial strategy does seem to have functioned effectively by directing growth primarily to higher order settlements. Consider it important that the new LDP continues to allow for housing growth within the Severnside settlements, including Magor / Undy, in order to ensure alignment between the Plan's economic and housing strategies. This will be particularly important given the future abolishment of Severn Bridge tolls and City Deal which may alter the level of housing demand in this area as well as the existing travel patterns of residents. These are key opportunities for Monmouthshire and should be taken into account when considering the spatial strategy for the new LDP Review.</p>	<p>Agreement noted. It is noted that the respondent considers that the LDP spatial strategy is functioning effectively although the RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.3	Llanover & Coldbrook Estate (LRM Planning)	Disagree	Note that development so far has broadly been in line with the spatial distribution of allocations. However, there are a few notable trends including the comparative lack of sites coming forward in rural areas and the reliance on windfall sites to provide short term supply given the lead in times for larger sites. This is set against the backdrop of the overarching shortfall in delivery and housing land supply. It is unlikely that the overarching spatial strategy would change significantly. However, it will need to be refined in order to address the issues with growth being encouraged in a range of settlements in order to provide an appropriate and deliverable supply of land for housing and avoid reliance upon windfall sites. Note that the list of settlements where growth is to be encouraged is likely to need to increase to ensure a robust supply pool, indeed, settlements where there has been no provision of housing are disadvantaged in terms of their ability to meet basic needs. Furthermore there may have been changes to settlements that would have improved their level of sustainability, for instance at Llanover there is now a village shop which would improve its sustainability performance.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
47.3	Taylor Wimpey (Turley)	Agree	<p>Support the Council’s approach of focusing the majority of residential development in the County’s main towns. However windfall sites have accounted for a significant proportion of completions within the main towns. Although this is still in line with the spatial strategy it is clearly a concern that the necessary housing delivery is not coming from the strategically identified sites. There is now a risk that the level of housing planned for will not be achieved within the plan period. The LDP Review is an opportunity to rectify this failure of the plan and additional sites should be identified and allocated to ensure that housing needs are met. Suitable sites in sustainable locations capable of delivering dwellings within the plan period should be allocated to accommodate the strategic growth needs of the County. The Report cites the previous poor record of housing delivery and seeks to use this to justify that achieving 750 dwellings per annum is ‘unrealistic’. Object to this approach, as the adopted housing requirement went through examination and was adopted on the basis that it reflected the required level of housing provision necessary to be delivered in the County to support the various other growth aspirations in the plan. A past record of under delivery and poor performance is not justification to plan for further failures in delivering the</p>	<p>It is noted that the respondent appears to consider that the LDP spatial strategy is functioning effectively. The RR recognises that there is a need to increase the supply of housing land. It is also considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
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plan strategy. In addition the report seeks to explain the poor delivery in housing by claiming that issues in the wider economy and housing market have suppressed delivery and that this has not recovered since the recession. However the wider economy is showing recovery and in the adjoining authority (Newport) 952 dwellings were completed in 2017, which clearly demonstrates that there is not a regional weakness in the economy or the housing market. Support the need for additional site allocations to be made through the LDP Revision.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.3	Llanarth Estates (WPM Planning)	Disagree	<p>Whilst the spatial strategy in relation to housing is generally supported, the current policies in place to facilitate this strategy in main and minor villages are considered to be fundamentally flawed which has led to a failure to deliver the spatial strategy proposed to the detriment of rural locations and their current inhabitants, future generations and ageing population. The spatial distribution of employment too heavily relies upon strategic sites/location, this leaves little choice for businesses and employers in terms of location. The existing tourism strategy is considered restrictive and debilitating growth in this industry in the County. The policy only supports temporary accommodation which does not allow for long term investment or tourist provision. The LDP Vision remains relevant and the principles set are encouraged and welcomed. The objectives are generally supported however those that refer to the level and range of homes, rural communities, infrastructure and the economy are considered to need updating in light of the progress of the LDP since its adoption:</p>	<p>It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
50.3	Mrs Evelyn Birden (Newland Rennie)	Disagree	The Spatial Strategy should include minor villages where accessible to permit residential development up to 15 dwellings with the emphasis on affordable housing.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revision. The RR also acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the rural housing allocations is to make provision of affordable housing for local people living in the rural parts of the County.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
51.3	Dr David Rosser (Newland Rennie)	Disagree	The development focus is totally concentrated on Severnside whereas other areas in the centre of the County such as Usk and other centres have not been considered where infrastructure is suitable for additional development.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
52.3	Morris' of Usk (WPM Planning)	Disagree	Whilst the spatial strategy in relation to housing is generally supported, i.e. growth being promoted in main towns, then Severnside, rural secondary settlements, main villages and to a lesser extent minor villages. The current policies in place to facilitate this strategy in main and minor villages are considered to be fundamentally flawed which has lead to a failure to deliver the spatial strategy proposed to the detriment of rural locations and their current inhabitants, future generations and ageing population. TAN 2 states that all local communities, both urban and rural, should have sufficient good quality housing for their needs, including affordable housing. As such, an appropriate amount of residential development of all tenures should be considered in rural areas to fulfil housing need.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The RR recognises that the spatial strategy may need revising.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
53.3	Barton Willmore	Disagree	As noted within the response to Q1 the impact of the removal of the Severn Bridge tolls, alongside wider economic aspirations (such as the Cardiff Capital Region City Deal and Welsh Government Metro proposals) will need to be given due consideration and an updated LDP Spatial Strategy devised to reflect this.	It is noted that the respondent considers that the LDP spatial strategy is not functioning effectively. The matters raised are matters to be considered in any LDP revision.	The RR recognises that the spatial strategy may need revising. These are matters to be considered in any LDP revision. RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
55.2	Abergavenny Transition Town (Late Rep)	Neither Agree Nor Disagree	The draft Review provides limited evidence to assess this. The overall reliance on strategic sites has been discussed but further analysis on a town-by-town basis is needed, evaluating any imbalance.	The benefits of a town-by-town analysis can be appreciated and will be looked at in more detail as part of any LDP revision process. It is not considered that such a level of detail is required at this stage, the aim of which is to assess, in broad terms, whether or not the existing LDP is working effectively.	No change to the RR.
56.3	Monmouth Town Council (Late Rep)	Disagree	Given the impact of the new NDF and the Regional plans around the Cardiff Capital Regional City Deal. This section needs an update. Given the growth in internet shopping and ICT on new homes there should be consideration given to a section in the LDP on high-speed broadband. The section on retail development and building developments we consider that on town statements needs to be reviewed and planning impact studies undertaken that support the viability of the retail sector in our market towns. A policy and process need to be put in place that recognises the old section 106 process. This should seek to support the place plans for town councils. Given the impact of the Well Being of Future Generations Act a full assessment of the implications of future generations should be undertaken. Sites are not being brought forward as quickly as expected therefore should a new settlement be considered.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
60.2	St Arvans Community Council (Late Rep)	Neither Agree Nor Disagree	No reports/updates have been received from MCC.	Comment noted.	No change to the RR.

## Q4 (Section 3.3): Do you agree with the findings of the LDP policy review?

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
1.4	Chepstow Society	Disagree	"Affordable Housing" is misunderstood by the public at large. More effort needed to explain its application.	Comment noted. This is a matter that can be considered in the consultation process for any LDP revision.	No change to the RR.
1.5	Chepstow Society	Disagree	Waste disposal needs to revert to a system for recycling of source separation to fit with current Welsh Government thinking.	This is not a matter for the LDP.	No change to the RR.
1.6	Chepstow Society	Disagree	Emphasis on Cardiff as a Capital Regional Plan will not do much to help Monmouthshire. Cardiff has enough "pull" already.	Comment noted.	No change to the RR.
2.1	Pontypool Park Estate	Comment	3.3.6: Whatever the merits of each case it discredits the extensive and lengthy LDP process if departure applications are approved so easily and cheaply.	Comment noted. It is agreed that it is preferable for planning applications to be determined in accordance with an approved development plan, hence the need for a revision to the LDP. However, Planning Policy Wales provides clear guidance on how planning applications should be considered where an authority does not have a 5 year land supply.	No change to the RR.
2.2	Pontypool Park Estate	Comment	3.3.11: Do not confuse need and demand.	Comment noted.	No change to the RR.
3.4	Trustees of the Late Mrs H M Langham	Agree	Agreement noted.		No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
4.4	Heine Planning	Disagree	With regard to para 3.3.11 onwards concerning Policy H8 and G&T it is clear the 2009 needs assessment for G&T underestimated need and was flawed. It failed to address both the need at Llangeview and at Llancayo, Usk. Current Policy was not informed by the 2016 need assessment. There is a need to make provision for more sites as noted in para 3.3.14, with site allocations made via the revised Local Plan. It is not accepted that Policy H8 is functioning effectively, it is not delivering sites without the need to go to appeal.	Comments noted. However, it should be noted that in 2009 the appellants for the Llangeview site were living at the Shirenewton site in Cardiff, and the occupiers of the Llancayo site were either living in bricks and mortar accommodation in Monmouthshire or living in Torfaen. The RR recognises that any LDP revision will need to give further consideration to addressing any unmet need for the provision of gypsy and traveller sites.	No change to the RR

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
6.1	The Canal & River Trust	Comment	<p>Policy MV6- note that the council comment that the policy is functioning effectively but has limited applicability, and so it is necessary to consider whether the policy is still required. Comment that the existing policy has little benefit due to its limited scope and advocate the need for an alternative strong canal related policy which recognises the multi- functionality of the canal and its wide ranging benefits. Existing policy is very limited in considering sustainable transport alone, the Monmouthshire &amp; Brecon Canal features strongly in the Council's Destination Management Plan and can contribute to the well-being plan in a number of ways. Welcome the opportunity to work with the council on the creation of a new canal related policy and supportive text as part of the next stage of work on the LDP review.</p>	<p>Comment noted. The RR acknowledges that there is a need to reconsider the need for Policy MV6, although the respondent appears to be suggesting that a policy is required, albeit in a modified form. This matter can be addressed in any LDP revision.</p>	<p>Amend the commentary on MV6 in the RR to read '... considered whether still required or whether amendment would be beneficial'.</p>
7.4	Mr Alan Horne	Agree	<p>Failing to provide sufficient affordable Homes. With the prices of homes rising partially due to the removal of the toll on the Severn bridges, this places a greater hurdle for people on low incomes to afford their own homes.</p>	<p>Agreement noted. The RR recognises that there is a need to attempt to increase the supply of affordable housing. This will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
8.3	Ann Langford	Disagree	Considers that that LDP should not be reviewed at this stage. There is no need to review the current strategic sites or add additional sites, there is more than enough land until 2021. Given the difficulties of forecasting demand with accuracy, rather than try to forecast up to 2036 resources should be devoted to reducing the delays in obtaining planning permission under the current LDP framework.	Comments noted. While the views expressed can be appreciated, the failure to meet housing targets set out in the LDP and the lack of a 5-year supply in accordance with the Welsh Government's current methodology does suggest a need to revise the LDP to ensure that planning applications can be considered within the framework of an up to date development plan.	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 revision or a full revision.
9.4	SA Brain & Co Ltd	Neither Agree nor Disagree	Amendment required to Policies S1 and S2. Need to re-assess undelivered allocations and allocate additional deliverable and viable sites to meet the LDP Review housing requirement. It will be essential that there is adequate flexibility in provision to allow for non-implementation of allocated sites. Evident that the adopted LDP does not have sufficient flexibility which has exacerbated the shortage in the 5 year supply. Need for more allocations in the lower tier settlements, there is limited delivery within the lower tier settlements and this is a significant factor that needs to be addressed during the LDP Review.	The RR acknowledges that there is a need to consider new housing allocations and to re-assess undelivered housing allocations as part of any revision process.	No change to RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
9.4			Affordable Housing (Policies S4, H7, SAH11) - Paragraph 3.3 .6 demonstrates that there has been considerable variation in the percentage of affordable housing between different sites and that the Council are prepared to take a flexible approach depending on the viability of sites. Whilst this may lead to delay in determining applications, it is essential that there is flexibility to allow sites to come forward. Important that affordable housing policies in the LDP Review include percentage affordable housing requirements based on viability evidence and that policies are flexible to allow variation in provision depending on site viability. With only 2 out of 19 sites being delivered this demonstrates that there has been a significant failure in delivering exception sites and that a requirement of housing at these sites needs to be addressed and reviewed.	The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any revision process to ensure that affordable housing policy requirements are based on up to date information on development costs and values. The RR also acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.	No change to the RR.
10.2	Natural Resources Wales	Comment	Undelivered allocated sites should be re-assessed using up to date environmental data constraints e.g. revised flood map information.	Comment noted. Undelivered allocated sites will be re-assessed in any LDP revision process.	No change to the RR.
11.4	Mr Paul Cawley	Neither Agree nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
12.4	RPS Planning	Neither Agree nor Disagree	Agreed that LDP Policies S1 and S2 will need to be amended to accommodate an increase in housing land supply and the Plan's residential site allocations will need to be reviewed and reassessed as part of the LDP revision process (paras 3.3 .4 and 3.3 .5 refer). Suggests land at Ross Road, Abergavenny as being a suitable site for increasing housing supply.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
13.4	Ward Estates Ltd	Agree	Agreed consideration will need to be given to the appropriate level of growth over the extended plan period and the suitability of the adopted spatial strategy which will require an amendment to policies S1 and S2. Also agreed that the housing site allocations will require amendment with the re-assessment of undelivered allocations and to allocate additional F71 deliverable and viable sites. In assessing the amount of land to be allocated for housing it will be essential to ensure that there is adequate flexibility in provision to allow for non-implementation of allocated sites.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
13.4			<p>Para 3.3 .6 demonstrates that there has been considerable variation in the percentage provision of affordable housing between different sites which demonstrates that the Council are prepared to take a flexible approach depending on the viability of sites . Whilst this may lead to delay in determining applications it is essential that there is flexibility to allow sites to come forward. It will be important that affordable housing policies in the LDP Review will include percentage affordable housing requirements based on viability evidence and that the policies are flexible to allow variations in provision depending on site viability.</p>	<p>Comment noted. The DDR (para. 3.3 .7) acknowledges that further viability testing will need to be carried out as part of any LDP revision to ensure that affordable housing policy requirements are based on up to date information on development costs and values.</p>	<p>No change to the RR.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
15.4	Bovis Homes (RPS)	Neither Agree nor Disagree	Agreed that LDP Policies S1 and S2 will need to be amended to accommodate an increase in housing land supply and that the Plan's residential site allocations will need to be reviewed and re-assessed as part of the LDP revision process. Support is provided to the recognition of the continued delivery of the Wonastow Road Strategic Housing Site at Monmouth, the site continues to be deliverable and should be retained and expanded as a Strategic housing site within the LDP Review. The balance of the Wonastow Road Strategic Site will come forward at land known as Drewen Farm. In addition land immediately adjacent to the allocated site, land to the north and west, offers an opportunity for an additional new site allocation that is accessible, free from constraints and deliverable.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision, although it is recognised that the existing site allocation at Drewen Farm, Monmouth referred to by the representor has good prospects of coming forward and is part of a larger allocation that is already being developed.	No change to the RR.
16.4	Bovis Homes (Walsingham Planning)	Agree	Agree that the housing policies require review in any full revision of the Plan, which is expected to extend its operational period to 2036. Agree that it will also be necessary to allocate additional deliverable and viable sites to meet the County's housing requirement over an extended Plan period.	Comment noted. The RR acknowledges a need to identify additional housing sites. Any potential changes to Green Wedge and Policy M2 designations will be matters for any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
16.4			<p>A review of the Plan’s residential site allocation policies and the identification of new sites for housing will mean that the appropriateness of policies that currently restrain new development, particularly at the edge of the County’s major settlements, will need to be reassessed. Welcome the identification of Policy LC6: Green Wedges as a policy that requires review. Specifically support the intention to fully review and revise the Green Wedge boundaries to ensure that designations are justified in the context of future growth requirements and strategies.</p>		
16.4			<p>The existing Green Wedge designation to the west of Chepstow constitutes a considerable constraint to the future growth of the town. There is no scope to accommodate new strategic development in other directions, given topographical constraints , the AONB landscape designation to the north, and the presence of various cultural heritage designations. Consequently, the logical direction for growth is to the west of the town and can be achieved without leading to coalescence with other settlements .</p>		
16.4			<p>The policy review should also include Policy M2, to establish whether the boundaries of the minerals safeguarding areas remain fit for purpose.</p>		

<b>Rep No</b>	<b>Representor</b>	<b>Agree/Disagree/Neither Agree nor Disagree/Comment</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
20.4	Hallam Land Management (Asbri)	Agree	The findings are generally supported as they confirm the need to allocate additional deliverable and viable sites to meet the County's requirement over an extended plan period. The key policies, including those relating to Housing and Site Allocations, and Affordable Housing are particularly in need of review. As the current LDP has not delivered sufficient housing, there are associated implications relating to the delivery of affordable housing. Policy S1 is referred to as a policy which needs to be amended in conjunction with wider policy aspirations associated with the Cardiff Capital Region. However it must be questioned whether Policy S1 requires any significant degree of amendment as the focus on the main market towns in Monmouthshire is likely to remain in the absence of any alternatives.	Agreement noted. The RR recognises that there is a need to increase the supply of housing land.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.4	Hallam Land Management (Boyer)	Agree	Housing and Site Allocations (Policies S1, S2, S3, SAH1-SAH11) - the adopted LDP has not delivered the level of housing growth identified as a consequence consideration will need to be given to the appropriate level of growth over the extended plan period and the suitability of the adopted Spatial Strategy which will require an amendment to policies S1 and S2. Agreed that the housing site allocations will require amendment with the re-assessment of undelivered allocations and to allocate additional deliverable and viable sites to meet the LDP Review housing requirement. In assessing the amount of land to be allocated for housing in the LDP Review, it will be essential to ensure that there is adequate flexibility in provision to allow for non-implementation of allocated sites. It is evident that the adopted LDP does not have sufficient flexibility which has exacerbated the shortage in the 5 year supply.	Comment noted. The RR acknowledges a need to increase housing supply and re-assess existing site allocations.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
21.4			<p>Affordable Housing (Policies S4, H7, SAH11) - Paragraph 3.3 .6 demonstrates that there has been considerable variation in the percentage provision of affordable housing between different sites which shows that the Council are prepared to take a flexible approach depending on the viability of sites. Whilst this may lead to delay in determining applications, it is essential that there is flexibility to allow sites to come forward. It will be important that affordable housing policies in the LDP Review will include percentage affordable housing requirements based on viability evidence and that the policies are flexible to allow variations in provision depending on site viability.</p>	<p>Comment noted. The DDR (para. 3.3.7) acknowledges that further viability testing will need to be carried out as part of any revision process to ensure that affordable housing policy requirements are based on up to date information on development costs and values.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
22.4	Redrow Homes	Agree	<p>The main issue is that some primary allocations that make up a valuable contribution to housing numbers were not deliverable. Concerns with specific site deliverability were expressed during the LDP preparation / examination by the development industry, it is important that the deliverability of sites put forward are recognised. This should include land ownerships and site disposals strategies being produced and followed. The reference to site delays due to viability is primarily down to unrealistic policies being set during the LDP preparation/examination and were raised by the development industry. Reference to past build rates for housing land supply is inappropriate. National Planning Policy guidance is explicit on methodology. The JHLAS 5 year land supply is purely a measuring tool and has no influence on the actual issues relating to housing demand and supply. The need for housing / housing land and the ability to deliver it should be the focus. Adjusting a land supply calculation may show betterment to the 5 year supply but only on reduced forecast and reduced delivery which is surely not the point.</p>	<p>Comments noted. The RR recognises that there is a need for additional housing allocations. The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
23.4	Richborough Estates (Turley)	Disagree	Support the need to allocate additional deliverable and viable sites to meet the housing requirement over the extended plan period. Whilst there is a role for strategic allocations, it is important that the LDP allows sufficient flexibility for other sustainable and deliverable sites to come forward. The value of allowing for a range of sites to come forward is demonstrated by the Council's pragmatic approach to the current housing supply position.	Comment noted. The RR recognises the need for additional housing allocations.	No change to the RR.
24.4	Mrs Carolyn Ovenden	Neither Agree Nor Disagree	It is impossible to answer this question as one must assume that the figures quoted in the review are correct. The original LDP was obviously flawed if a review is necessary	Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
25.1	Angela Smith		Strongly object to any amendments which would increase the number of general market and affordable housing on the Crick Road development site. On the basis of 34 houses per hectare the maximum number of houses would be 252.3 for the Crick Road site, considerably less than the 285 currently proposed. There are no changes to the existing infrastructure to support any new build. A failure to ensure that planning permission is only given to developers that can fulfil the number of required general market and affordable homes should not lead to the detriment of those sites that are already more than fulfilling their allocation.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
26.4		Comment	MV1 in relation to proposed developments and highways needs to be strengthened to fully take account of the need for infrastructure requirements and not to allow for unsustainable development.	The RR expresses the view that policy MV1 is functioning effectively. Nevertheless, any LDP revision would provide an opportunity to consider re-wording if felt to be appropriate.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.4	Cllr Louise Brown	Disagree	There is no necessity for the LDP to be reviewed if the population projections are revised to a lower figure and then the LDP would have the 5 year rather than 4 year supply.	Comment noted but any revision to the housing target as a result of revised population projections could only be done through a revision to the LDP.	No change to the RR.

26.4		Disagree	Strongly disagree with the proposal to delete SD3 flood risk policy, this policy needs to be both retained and strengthened by national policy. MCC is not giving this national policy enough weight, this is unfair to future residents who may not be able to get household insurance or have to pay exorbitant rates for insurance. The review suggests removing the flood policies. These should not be removed because of the fact that there are National policies instead this policy needs to be reinforced with reference to making sure that national policy is followed. Residential development should not be in Flood zone C2. There are extremely good reasons for following national planning policy so that residents do not have to suffer from the devastating impact of flooding.	The suggested removal of Policy SD3 is in accordance with generally accepted practice that LDP policy should not repeat national planning policy and should be in consistent with it. Sufficient control over development in flood risk areas is provided by Technical Advice Note 15. The current LDP policy is not consistent with national policy - in some aspects it is more lenient and in others it is stricter. This inconsistency is not a satisfactory situation. Any changes to the policy, however, that would be a matter for any LDP revision.	No change to the RR.
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Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
26.4		Disagree	In addition in England the National planning policy framework and case law have prevented back garden development. This is presumably because of the impact of concreting over gardens so that there is no natural drainage of water. The same effects have been noted in the Bulwark area of Chepstow due to residents putting tarmac over gardens for parking spaces.	This matter has been addressed via other mechanisms, for example the Welsh Government has amended permitted development rights to require permeable surfaces or drainage retention. Monmouthshire's LDP cannot change the brownfield status of domestic gardens.	No change to the RR.
26.4		Disagree	Policy LC6 on Green Wedges should not be changed except to change to greenbelt to provide better protection to the existing green wedges. It is vitally important that this policy is maintained. The protection of the green gap wedge between towns and villages and between villages and villages is vital to maintain village identity and to stop urban sprawl and prevent villages merging. To do otherwise will destroy the identity of the villages and should never be allowed. The main villages close to Chepstow are under threat due to an unnecessary threat of unsustainable development in the South Monmouthshire area.	The RR suggests that there is a need to review Green Wedge boundaries. It is considered necessary to carry this out to ensure that such designations can be appropriately justified. The respondent's opposition to any amendments is noted but this is a matter that will be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
28.4	Llangybi Community Council	Disagree	In general terms the issues have been fully identified. However, concerned about the implication in Paras 3.3 .9 and 3.3 .1 0 that the affordable housing requirements will need to be relaxed. Also concerned that it is proposed to reassess the recreation and open plan spaces as per paras 3.3 .1 8 and 3.3.19. Any loss of such space is not compatible with additional housing.	Comments noted. The paragraphs referred to state that these policy areas will be re-considered. This does not necessarily imply a relaxing of requirements or lowering of standards and, in any event, these would be matters for any LDP revision.	No change to the RR.
30.2	Monmouth Chamber of Commerce	Agree	Agree with the revision of Primary shopping Frontages to ensure designations are up to date and appropriate. Need to consider how much change from A1 retail to A3 and A5 use is acceptable. Seek a more pragmatic approach on changes to commercial buildings in Primary Shopping Frontages areas to make them fit for contemporary retail use. The retail sector is in a constant state of change due to competition from internet shopping and out of town retail developments, studies need to be done on a yearly basis and appropriate action taken to rectify any undesirable trends.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
30.2		Comment	Support efforts by the council to improve the tourism offering and the use of renewable energy. See 3.3 .36 to 3.3 .42	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
30.2			Not enough thought went in to decisions on siting new housing estates when the new Wonastow Road and Owen Glyndwr locations were chosen from the list of Candidate Sites. It is currently difficult, or even dangerous, to walk into town from these sites. Recommend that any new housing locations are sited where residents can travel on dedicated traffic free foot and cycle paths into the town thus reducing the demand for more car parking and contribute to their well-being. Question the reasoning behind creating satellite housing developments where a consequence is that residents who out migrate to work will be tempted to shop near work and not locally.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
30.2			Question the comment made in 3.3 .51 as to the effectiveness of transport in our area of Monmouthshire. Public transport remains very poor, especially to locations outside the county.	This paragraph specifically relates to LDP policies on transport. It is recognised that there are difficulties with public transport in Monmouthshire. The LDP can have limited influence over public transport facilities.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
31.4	Mr Adrian Lewis	Neither Agree Nor Disagree	The findings are sound but lack detail on what they mean in practice, particularly when it comes to numbers of dwellings and distribution of strategic sites. If it means increasing the number of dwellings on the Crick Road site, then I am against the findings. Likewise if it means increasing the percentage of affordable homes on strategic sites, then I am against this too. The numbers of affordable homes do not appear to take into account that the Paper Mills site was not initially included in the LDP - 9.4% of its number, I understand, amounts to 18 homes. This is 18 more than originally planned for. Also I would question what is considered viable. If MCC has a policy of 25% affordable homes on a site then the developers should adhere to this and understand the impact on profitability. Any shortfall should not be imposed on strategic sites.	The reference to the Crick Road site is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site. Any possible changes to affordable housing percentages would be a matter for any LDP revision. Policy required that the Sudbrook Paper Mill site should have provided 25% affordable but this had to be reduced because of viability considerations resulting from the expense of remediating a brownfield site.	No change to the RR.
32.4	Mr Rees Williams	Agree	It reflects the current situation and once again urgent correction to housing /land supply is required.	Agreement noted.	No change to the RR.
33.4	Abergavenny Town Council	Comment	There are clearly some areas which are more than local, therefore will the evidence base consider the regional dimension. Infrastructure is an obvious example.	Any revised LDP will involve consultation with neighbouring authorities and will be prepared in the context of the Cardiff Capital Region, City Deal etc.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
34.3	Barratt David Wilson Homes		In light of the forthcoming abolishment of the Severn Bridge tolls, consider there to be a major opportunity for housing growth within the Severnside area. The viability of these areas is likely to see a significant improvement in the near future, thereby improving the deliverability of these sites. Accordingly, suggest that a greater proportion of new housing development should be directed to these areas.	Comment noted. It appears that the respondent is suggesting that the LDP's spatial strategy requires revising to increase the focus on the Severnside area. Any policy review needs to ensure affordable housing meets identified need and future flexibility both in terms of size and tenure.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
34.3			Welcome the review of land designated by Policy DES2 given that a number of these designations are no longer fit for purpose. In terms of Green Infrastructure, would suggest that the Green Infrastructure Supplementary Planning Guidance is reviewed given that it is difficult to use and does not provide sufficient clarification as to the way green infrastructure planning obligations will be calculated or defined. Furthermore, given the financial implications of providing Green Infrastructure within the County, the associated costs need to be factored into viability reviews undertaken for proposed allocations in the LDP Review and the Affordable Housing Viability Review.	Comment noted. The Green Infrastructure policy and SPG have been useful in ensuring better quality place-making and environments for future occupiers. Consideration will be given to whether the Policy or SPG requires clarification. It is accepted that achieving GI often requires lower development density and the revised LDP will need to respond to this.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
36.4	East Mon Industrial Holdings Ltd (WYG)	Disagree	<p>Agree that policies S1 and S2 and site allocations will need to be fully reassessed as part of the full review of the LDP. In addition it is considered that necessary amendments to green wedge designations will be required. It is considered essential that the plan's employment policies, specifically Policy S9 Policy SAE1 are reassessed in full. This should include the consideration of additional land for allocation in the right locations and the desirability of allowing greater flexibility of economic uses on such allocated sites. The need to undertake a full review of the plan's employment policies is further reinforced by the fact that the LDP employment evidence base will need to be updated to take into account the requirements of Chapter 7 of PPW which has been updated since the adoption of the LDP and updated TAN 23: Economic Development (February 2014) . The LDP take-up rate will need to be reassessed to factor in the new economic opportunities arising from the City Deal and Severn Bridge tolls abolition. Reassessment of both the total amount and the spatial distribution of employment land is required as part of the full review of the LDP. In regard to the plan's review of tourism policy, it would appear that tourism policies are enabling a significant level of 'sustainable tourism' to come forward in the County. It is considered</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			that alongside the promotion of sustainable tourism, the LDP review should consider the need for provision of larger-scale accommodation, to ensure that the policy framework does not over-provide on alternative forms of sustainable accommodation to the detriment of hotel accommodation.		
37.4	Abergavenny & District Civic Society		The findings are not always clear, particularly regarding housing and employment performance. Would not agree that all the design and heritage policies have been functioning entirely effectively. The draft report refers to minor amendments needed as a result of Officer Working Group comments. In view of concerns with regard to the Morrison store would like to see them. The report maintains that Policies MV2 (Sustainable Transport Access) and SD12 (Sustainable Construction and Energy Efficiency) are functioning effectively. The latter needs discussion as it may no longer be a planning function. Performance under MV2 has probably improved but a detailed analysis could explore the scope for greater effectiveness.	Comments noted. They appear to relate to how existing policies are implemented but policy wording can be considered further in any LDP revision.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
39.4	Home Builders Federation	Neither Agree Nor Disagree	Para 3.3 .8 suggests that work has already been done to establish why allocated sites have not come forward. Whereas para 3.2 .14 suggests further consideration will be given to the reason for the lack of progress. This should be clarified/consistent. Suggest as part of the survey of open space within the main settlements and villages, details of any open space lost compared to the 2008 study should be identified and the reason for its loss noted. Reference should also be made to the Councils position with regard to the adoption of open space.	The information in para. 3.3 .8 is based on current knowledge, rather than any detailed analysis or investigation. As part of any LDP revision process a further detailed analysis would need to be carried out to justify under the candidate site assessment process to justify retention or deallocation of village sites. There is not considered to be any inconsistency with para. 3.2.14. Para. 3.3 .1 8 Comment noted. This can be considered as part of the open space survey. Para. 3.3 .19 This not considered necessary. A guidance note is being prepared to assist in Section 106 negotiations, including information on open space adoption.	No change to the RR.
40.4	Magor with Undy Community Council	Neither Agree Nor Disagree		Noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
41.4	Philippa Cole	Disagree	The LDP Review Report appears to be laying the foundation for there to be reduced level of housing delivery during the plan period and a review of the housing targets. There has been no consideration of the possible pent up demand for housing indicated by the higher population base data recorded in the 2011 figures which could suggest that many potential households are not forming due to supply issues. It remains Welsh Government priority to increase housing supply and maximise benefits through local jobs and apprenticeships.	It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.	Paragraph 2.3.5 of the RR to be amended to clarify the reasons behind household formation.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
45.4	Bovis Homes Group (Lichfields)	Agree	<p>Consider that the shortfall in the housing land supply is not as simple as is suggested in the Review Report. It is important that the Council undertakes a comprehensive review into why allocated housing sites are not coming forward, with specific reference to the LDP allocation Land at Vinegar Hill . This should include a full review of the policies within the plan to ensure that the targets set out do not make sites unviable i.e. s106 contribution. It is important that each housing allocation is reviewed on its own merit taking into account the very specific issues relating to that site. Any review of undelivered housing allocations should be in consultation with the landowner / site promoter, and a transparent approach should be undertaken when assessing whether the sites remain viable and deliverable. Furthermore it is important that this review is undertaken with consideration to ensuring that sufficient housing land is identified to meet the level of housing growth, taking into account the significant shortfall in housing supply since the adoption of this LDP, and while also making provision for a flexibility allowance, to allow for a greater choice of housing land to be delivered.</p>	<p>The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
46.4	Llanover & Coldbrook Estate (LRM Planning)	Disagree		Noted.	No change to the RR.
47.4	Taylor Wimpey (Turley)		The LDP Review process is an appropriate opportunity to review Green Wedge Policies. There is a clear distinction between the policy intentions for Green Wedges when compared to Green Belt, with the former specifically including flexibility to be reviewed unlike Green Belt which is intended to have an element of permanence. Policy LC6 needs to be reviewed as part of the LDP Review. A revision in the boundaries of current Green Wedges is necessary to ensure such restrictive designations are justified in the context of a Local Authority with a very poor track record of housing delivery. There is a clear shortage of housing delivery in the County and the LDP review is a critical opportunity to review this designation, reflecting material change in circumstances since this designation was put in place.	Comments noted. The matters raised are matters to be considered in any LDP revision.	No change to the RR.



Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
48.4	Llanarth Estates (WPM Planning)	Disagree	<p>Whilst the general findings of the review are concurred with the following aspects of the review are not supported. The calculation for the housing land supply is the residual method and the past build rates method is considered irrelevant. It is considered that the housing projections proposed to form the basis for the revised LDP are not sufficient in taking account of likely population growth following the abolition of the Severn Bridge tolls. The difficulties of delivering the rural allocation sites is far more complicated than purely unrealistic land owner expectations but a combination of infrastructure costs, visual impact, contractors availability and deliverability, size of allocations and land owner expectations. It is not reasonable to blame landowners for the lack of rural allocations coming forward when it is clear the rural allocations policy is failing due to the lack of robust economic consideration in the allocation of the sites and the associated often unrealistic affordable housing targets. Allocation of alternative sites with the same policy context is likely to produce the same results. The policy relating to minor villages and infill development is unclear in terms of the level of affordable housing required for developments of 1 or 2 dwellings. Further clarity is required in regards to Policy H7 and how rural exception sites will be considered in</p>	<p>Comments noted. It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			respect of minor villages which do not have a settlement boundary.		
48.4			<p>A Key issue for the LDP to resolve is providing for the ageing population. It is considered that a policy specifically for elderly person's accommodation should be proposed to facilitate such developments in urban and rural locations. The quantity and location of the majority of the employment allocations is considered restrictive to smaller, rural business. Employment opportunities in minor villages should be considered to enable localised employment opportunities. The tourism policy as currently applied is considered restrictive and does not allow for purpose built visitor accommodation in more modern buildings. It is considered that if Monmouthshire is to meet the LDP Vision, there is a need to increase the quality and range of tourism proposals especially in key locations near attractions.</p>	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
50.4	Mrs Evelyn Birden (Newland Rennie)	Agree	In general agree providing the release of suitable additional land allocations are released to maintain housing requirements.	Comment noted.	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
51.4	Dr David Rosser (Newland Rennie)	Agree		Agreement noted.	No change to the RR.
52.4	Morris' of Usk (WPM Planning)	Disagree	<p>Whilst the general findings of the review are concurred with the following aspects of the review are not supported. It is considered that the housing projections proposed to form the basis for the revised LDP are not sufficient in taking account of likely population growth following the abolition of the Severn Bridge tolls. The difficulties of delivering the rural allocation sites is far more complicated than purely unrealistic land owner expectations but a combination of infrastructure costs, visual impact, contractors availability and deliverability, size of allocations and land owner expectations. It is not reasonable to blame landowners for the lack of rural allocations coming forward when it is clear the rural allocations policy is failing due to the lack of robust economic consideration in the allocation of the sites and the associated often unrealistic affordable housing targets. Allocation of alternative sites with the same policy context is likely to produce the same results. It is strongly considered that the delivery of affordable housing, especially in rural areas is flawed, and needs full revision in any LDP review.</p>	<p>Comments noted. It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County.</p>	No change to the RR.

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
53.4	Barton Willmore	Disagree	<p>Paragraph 3.2 .9 of the Draft Review Report refers to the economic recession having residual effects on the rate of housing delivery in Monmouthshire. Whilst wider economic factors will have a direct bearing on the delivery of allocated sites, it is considered that the impacts of the recessions (which officially ended some time ago) are overstated. Given the slippage of the strategic sites and the impact this has had on the delivery of the Plan’s objectives these sites should be fully scrutinised and assessed in terms of their viability and deliverability. Whilst the Draft Review Report identifies that a number of allocated strategic sites have obtained planning permission, the Inspector’s Report to the LDP noted that “the fact that a planning application has been submitted does not conclusively demonstrate deliverability”. Accordingly, these sites should also be subject to a further up-to-date assessment of viability and deliverability, which has regard to the Welsh Government’s ‘Longitudinal Viability Study of the Planning Process’ (February 2017). Policy considerations relating to the impact of the removal of the Severn Bridge tolls, alongside wider economic aspirations (such as the Cardiff Capital Region City Deal and Welsh Government Metro proposals), and the need for these to align with housing provision will need to be reflected within</p>	<p>Comments noted. With regard to economic and market conditions it is recommended that a change be made to para. 2.1.4 (see Rep. no. 39.1).The RR acknowledges that there is a need to re-assess undelivered housing allocations. The Welsh Government has not yet responded to ‘Longitudinal Viability Study of the Planning Process’ (February 2017). It is difficult, therefore, to know how to address it at this stage. The matters referred to, e.g. the removal of the Severn Bridge tolls, are matters to be considered in any LDP Revision.</p>	<p>Amend para 2.1.4 as in Rep. No. 39.1.</p>

Rep No	Representor	Agree/Disagree/Neither Agree nor Disagree/Comment	Comment	LPA Response	Recommendation
			the LDP Review. Support the need to review existing Identified Industrial and Business sites, and the opportunity to consider whether any sites should be de-allocated or re-allocated for a different use. Support the Plan's renewable energy evidence base being updated and areas of search for local authority scale renewable energy being explored through this process.		
55.3	Abergavenny Transition Town (Late Rep)	Disagree	There is a complacency in the Draft Review when it states that all design and heritage policies have been functioning entirely effectively. A brief visit to local sites would demonstrate a breakdown of many of those policies. The beginnings of change are on the horizon with proper Pre App procedures with developers being piloted and conversations beginning on Urban Frameworks being drawn up on sites for the future and written into the LDP as guidance. So some re-writing of the LDP will be required to make sure that all carries through. It is welcome that proper visualisation of projects is now being expected by the Planning department.	Comments noted. They appear to relate to how existing policies are implemented but policy wording can be considered further in any LDP revision.	No change to the RR.
57.2	Usk Town Council (Late Rep)	Agree	Agree with the potential changes identified in the report.	Agreement noted.	No change to the RR.
60.3	St Arvans Community Council (Late Rep)	Agree		Agreement noted.	No change to the RR.

## Q5 (Section 5): Do you agree that the LDP needs to be revised? If so do you think that a short form procedure or full revision procedure should be followed?

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
1.7	Chepstow Society	Full	More effort needed to align with neighbouring authority plans. Nothing said in plan about consultation with FoDC or Gloucestershire CC. The SE corner of the County needs to consult with all of its neighbours.	It is noted that the respondent supports a Full revision of the LDP. Liasion with neighbouring authorities will be necessary in any LDP revision process.	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 revision or a full revision.
4.5	Heine Planning	Full	Fully support immediate and full review to ensure all housing needs are addressed but in particular those of Gypsy and Travellers. Clearly there is no justification for anything short of a full review.	It is noted that the respondent supports a Full revision of the LDP, specifically because of the need to address housing needs of gypsies and travellers.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
7.5	Mr Alan Horne	Full	<p>The balance between land allocated for employment and for homes should be reviewed. Land allocated for employment should take into account modern working practices especially home working and Ecommerce. Land allocated for employment, if close to existing employment sites, should be considered for affordable homes. This would also assist people to live closer to their work and reduce travel.</p>	<p>It is noted that the respondent supports a Full revision of the LDP., the main concern appearing to be the potential for deallocation of employment land. This will be a matter to be considered in any LDP revision.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
9.5	SA Brain & Co Ltd	Full	<p>Essential the LDP is reviewed to meet Welsh Government Regulations and ensure provision is made to extend the plan period beyond its expiry in 2021. A full review should take place because the existing strategy is not working, it is failing to deliver its housing strategy because of over reliance on strategic sites and under provision in other settlements, as well as there being a requirement for updated housing requirements and land allocations to the end of the revised plan period to 2036. Review will need to include provision for a realistic level of housing that will meet current and future housing requirements and ensure that there is adequate flexibility in the housing supply to maintain a 5 year supply of housing land. Support allocations of strategic sites and acknowledge their importance however, there is a need to utilise different sources to meet housing land supply and not only focus on the main towns but also allow allocations in the lower tier settlements.</p>	<p>It is noted that the respondent supports a Full revision of the LDP, considering that the existing LDP strategy is not working..</p>	<p>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 revision or a full revision.</p>



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
10.3	Natural Resources Wales	Full	Support the conclusions under section 5. A full revision appears logical and reasonable.	It is noted that the respondent supports a Full revision of the LDP	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
12.5	RPS Planning	Full	<p>Support given to the reasoning set out in support of the Full Review of the Plan. The 2016 and 2017 Annual Monitoring Reports provided the evidence in support of an early review of the LDP in order to address the shortfall in housing land supply and to identify and allocate additional sites. The review should support already allocated sites which are already delivering housing in accordance with their planning permissions so as to not frustrate their supply through reserved matters or discharge of conditions processes. It is considered sensible to undertake a full review of the LDP to ensure all strategies and policies are kept up to date, based on the latest evidence to support the future supply of housing. A pragmatic approach to housing land supply should also be factored into the Review which allows for planning permission to be achieved on preferred development sites in advance of the LDP's adoption to ensure a 5-year land supply can be achieved/maintained on adoption of the plan and during the plan period.</p>	<p>It is noted that the respondent supports a Full revision of the LDP, although the support of the existing LDP spatial strategy and promotion of a new site in Abergavenny might have suggested that a short form revision would meet the respondent's concerns.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
13.5	Ward Estates Ltd	Full	<p>Agree that it is essential that the LDP is reviewed to meet Welsh Government Regulations and to ensure that provision is made to extend the Plan Period beyond the current period which is due to expire in 2021. Also consider that a Full Review should take place because the existing strategy is not working as it is failing to deliver its housing strategy because of over reliance on strategic sites and because there will be a requirement for updated housing requirements and land allocations to the end of the revised plan period in 2036.</p>	<p>It is noted that the respondent supports a Full revision of the LDP.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
13.5		Full	<p>The LDP provides an overarching and comprehensive land use-planning framework for Monmouthshire and as part of that Strategy and objectives the delivery of housing is a crucial element for the Council. Progress on Strategic Sites is not being made nor delivered as anticipated in the adopted Plan and as a consequence there is a shortage in the 5 year housing land supply. The LDP Review will need to include a provision for a level of housing that will be realistic and appropriate to meet current and future housing requirements and ensure that there is adequate flexibility to maintain a 5 year supply of housing land.</p>		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
15.5		Full	Further justification for a MCC only LDP should be provided in light of WG Minister Lesley Griffiths letter issued in December 2017 regarding joint working with neighbouring authorities and the production of Strategic Development Plans. It is however considered that MCC needs to commence with a full review of the plan as soon as possible. MCC cannot afford to wait for joint working to put a plan in place given the current housing	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.
15.5	Bovis Homes (RPS)	Full	Support given to the reasoning for a Full Review of the Plan. The 2016 and 2017 Annual Monitoring Reports provided the evidence in support of an early review of the LDP in order to address the shortfall in housing land supply and to identify and allocate additional sites. The review should also support allocated sites which are already delivering housing in accordance with their planning permissions so as to not frustrate their supply through reserved matters or discharge of conditions processes.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
15.5		Full	Given the time it takes for LPAs to prepare and adopt LDP's, it is considered sensible to undertake a full review of the LDP to ensure all strategies and policies are kept up to date, based on the latest evidence to support the future supply of housing. A pragmatic approach to housing land supply should also be factored into the LDP Review allowing planning permission to be achieved on preferred development sites in advance of the LDP's adoption to ensure a 5-year land supply can be achieved/maintained on adoption of the plan and during the plan period.		
16.5		Full	Cannot support a short form revision based on a housing requirement derived from more recent population and household formation projections, as these are likely to be reflective of house price increases that are preventing new households being formed. Ought properly to be considered through updated housing market assessment work to inform a full revision of the Plan.		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
16.5		Full	The reduction and eventual removal of the Severn Bridge tolls will inevitably have an impact on the County generally, and Chepstow in particular, in terms of development pressures, given the proximity to Bristol and the wider South West region. Furthermore, the house price evidence clearly indicates that affordability in the County will progressively become a significant problem, especially for economically active younger people, if this is not addressed through additional housing supply.		
16.5		Full	Since adoption a number of legislative and policy changes have been made that alter the national, regional and local context to the Plan e.g. the Cardiff Capital Region and City Deal initiative. The resulting economic investment will provide a significant opportunity for Monmouthshire.		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
16.5	Bovis Homes (Walsingham Planning)	Full	Planning Policy Wales (November 2016) makes it clear at paragraph 2.12.1 that to ensure that the LDP is kept up to date an authority should commence a more thorough full review of its LDP at least once every four years following adoption.	It is noted that the respondent supports a Full revision of the LDP. The level of housing growth required will be a matter to be considered in any LDP Revision,	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 revision or a full revision.
16.5		Full	A full revision should be commenced so that a new adopted LDP is in place upon expiry of the current Plan in December 2021. The Review Report notes that Welsh Government officers have advised that they would not support the Council in undertaking a short form revision of the Plan.		



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
20.5	Hallam Land Management (Asbri)	Full	<p>The LDP is in need of a review as the current plan will be time expired in 2021. The decision to start on the review process is therefore supported.</p> <p>The main priority should be to identify new sites in line with a strategy which continues to focus on the main towns with a proportionate distribution elsewhere. Ultimately it is likely that the Welsh Government will determine that a Full Review is required.</p>	<p>It is noted that the respondent supports a Full review of the LDP, although the support for the existing spatial strategy could suggest that a short form review might be appropriate.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
21.5	Hallam Land Management (Boyer)	Full	<p>Agree that it is essential that the LDP is reviewed to meet Welsh Government Regulations and to ensure that provision is made to extend the Plan Period beyond the current period which is due to expire in 2021. Also consider that a Full Review should take place because the existing strategy is not working as it is failing to deliver its housing strategy because of the over reliance on Strategic Sites and because there will be a requirement for updated housing requirements and land allocations to the end of the revised plan period in 2036. The Review will need to include a provision for a level of housing that will be realistic and appropriate to meet current and future housing requirements and ensure that there is adequate flexibility in the housing supply to maintain a 5 year supply of</p>	<p>It is noted that the respondent supports a Full revision of the LDP.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
21.5		Full	Whilst it is noted that there has been a failure in the Strategy the focus of delivering growth within the Main Towns should remain an essential priority for the revised LDP Strategy as part of the Full Review process. These Main Town areas provide an important role within Monmouthshire given they are the County's most sustainable settlements, where there is the greatest potential to support new housing, jobs, services, community facilities and public transport.	It is noted that the respondent supports the existing LDP's spatial strategy of focusing growth on the County's Main Towns.	No change to the RR.
22.5	Redrow Homes	Full	Fully support the full review to ensure all matters are appropriately considered to inform a development plan covering up to 2036.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
23.5	Richborough Estates (Turley)	Full	<p>Agree that the adopted LDP needs to be revised, also support a full revision of the LDP, rather than a 'selective review'. The adopted LDP has a relatively short plan period given the time required to progress through the various plan making stages, it is essential that the review process commences now. Without doing so, there is a likelihood that the Council will not be able to rely upon an up to date Development Plan after 2021. The need to review the LDP is supported by the Council's AMR (in both 2016 and 2017), which has recommended that the LDP is reviewed to address the shortfall in housing land supply and facilitate the identification/allocation of additional housing land.</p>	<p>It is noted that the respondent supports a Full revision of the LDP.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
23.5		Full	<p>Undertaking a full revision, rather than a 'Short Form' version, will ensure that the LDP considers, and addresses, all factors rather than focusing solely on housing supply. This is important given the interaction between housing supply and other aspects of the LDP. This includes policies ranging from the overall spatial strategy to economic aspirations, infrastructure requirements and environmental/landscape designations. As such, a piecemeal, 'short form' review would not be appropriate in this instance. A full review would provide an opportunity to address issues including a too short plan period and an over dependency on a limited number of strategic sites. A full review will also enable the LDP to reflect important contextual changes such as the Cardiff Capital Region City Deal and other economic/market influences.</p>		

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
24.5	Mrs Carolyn Ovenden	Full	In light of Severn Bridge toll-removal, Monmouthshire will be subject to great change in the next few years. A full review will take time and some of these changes will become more apparent by the time a full review is made. Then a new full LDP will not have to be subject to another costly interim review.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.
28.5	Llangybi Community Council	Full	The number of targets that are not being achieved are such that a full revision of the LDP is required.	It is noted that the respondent supports a Full review of the LDP.	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 revision or a full revision.
33.5	Abergavenny Town Council	Full	Do not consider that MCC has a choice if WG have advised that they will not support a short form revision	Comment noted.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
34.4	Barratt David Wilson Homes	Full	Support a full revision to define new, deliverable housing allocations that are financially viable. For the reasons outlined would resist a reduction of the overall housing target resulting from trend-based housing projections, particularly in light of wider policy aspirations of the Welsh Government and the Cardiff Capital Region. Would welcome the opportunity to discuss proposed housing allocations in terms of their viability and deliverability, this would help to ensure that future allocations are fit for purpose and make a meaningful contribution to the Council's overall housing target.	It is noted that the respondent supports a Full revision of the LDP. The level of housing growth required will be a matter to be considered in any LDP Revision	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
36.5	East Mon Industrial Holdings Ltd (WYG)	Full	<p>The end date of the current plan is 2021, as such, an adopted revised LDP will be required to be in place within 3-4 years. If a shortform review is undertaken this risks a significant and long-term policy vacuum.</p> <p>Furthermore, undertaking short-form revision is not appropriate as it will not be possible to restrict the review to identification of new sites in line with the existing strategy. Significant changes to the level and spatial distribution of growth will be required in order to prepare a deliverable plan to 2036. The extended plan period to 2036 is supported, and associated updated land requirements will result in substantive changes to the LDP Strategy, thereby necessitating full review.</p>	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
39.5	Home Builders Federation	Full	The reason for WG not being willing to support a short form revision to the plan should be included in the text. Support the plan being able to be revised as quickly as possible as this should help resolve the lack of a five year lands supply. However due to the number of issues identified in the report and the rapidly changing wider economic environment support a full revision of the plan.	<p>It is noted that the respondent supports a Full revision of the LDP. The Welsh Government (WG) has indicated in that it will not support a short form revision for the following reasons: 'The AMR indicates that the delivery of housing is falling well below the anticipated annual rate and the strategic sites are not being delivered as planned (in terms of timing). The combination of these two issues appear as going to the heart of the plan which would not merit a short form review procedure; A short form revisions would be a high risk strategy in terms procedurally, potentially raising questions of 'soundness' and placing adoption of the plan at high risk'.</p> <p>Nevertheless, the regulations allow for a short form revision and it is considered necessary for the RR to address this and leave the option open. To avoid unrealistic expectations it was considered necessary to flag up that a short form revision is unlikely to be acceptable to the WG.</p>	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
41.5	Philippa Cole	Full	It would be a duplication of resources to undertake a partial review at this time.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.
45.5	Bovis Homes Group (Lichfields)	Full	Consider that there should be a full review of the Local Plan in accordance with government guidance for a full review every four years. This will ensure that the review of the level of housing requirement is considered against other key factors such as an updated strategy that reflects the employment and economic growth aspirations from the regional City Deal.	It is noted that the respondent supports a Full revision of the LDP, although it a Full review that is required every four years. This Full review report will be making a recommendation on the next step to take - the form of revision that may be required.	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 revision or a full revision.
46.5	Llanover & Coldbrook Estate (LRM Planning)	Full	Agree that the plan needs to be reviewed and consider that due to the short timeframe left of the existing plan it is prudent to extend the period to 2036. Consider that given the timeframe involved and the future socio-economic well being of the Authority this requires a Full Revision.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
47.5	Taylor Wimpey (Turley)	Full	<p>There is no doubt that there is a need for a full review of the LDP. To underestimate the scale of revision needed to the plan, or to limit the scope of review could result in the need for further review sooner than would be necessary if the LDP were not properly reviewed now. That is not to say that any LDP review should not be expedited, given the importance of the issues to the ongoing health and success of the County and its main towns, and the significant under performance provided by the LDP since adoption. A piecemeal review is not appropriate, the interrelated nature of the policies that need to be reviewed, and consequences of the level of change required, is significant justification for the need to review the plan as a whole. This review should include amendments to Policy S1 regarding Development Boundaries, Policy S2 regarding the level of housing provision, Policy S3 regarding the identification of Strategic Housing Sites and Policy LC6 in respect of Green Wedges. Furthermore, the full review should learn the lessons experienced since the adoption of the current LDP, namely that it covers too short a plan period and has an over dependency on a limited number of strategic sites. The plan period should be at least until</p>	<p>It is noted that the respondent supports a Full revision of the LDP. The matters raised are matters to be considered in any LDP revision.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
			2036.		
48.5	Llanarth Estates (WPM Planning)	Full	It is considered that a full revision is required to enable the issues raised in this representation to be assessed fully and revised accordingly.	It is noted that the respondent supports a Full revision of the LDP.	RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision
52.5	Morris' of Usk (WPM Planning)	Full	It is considered that a full revision is required to enable the issues in housing delivery to be assessed fully and revised accordingly.	It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
53.5	Barton Willmore	Full	<p>A Full Revision of the LDP is required to address the shortfall of housing land supply caused by the failure to deliver the levels of housing growth set out in the Plan, and to facilitate the identification and allocation of additional housing land. The level and distribution of growth will need to have regard to the impacts of the removal of the Severn tolls, and to align with the significant economic aspirations for the region and Authority are .</p> <p>Notwithstanding this note that Lesley Griffiths AM recently wrote to the Council inviting a proposal for an SDP for the South East Wales region.</p> <p>Consider that a Full Revision to the LDP should be undertaken in addition to progressing a SDP. This would help deliver an effective decision making framework and facilitate acceptable development of strategic importance without leaving a policy vacuum.</p>	<p>It is noted that the respondent supports a Full revision of the LDP. The RR will be amended to further address the issues of joint working and the implications of a SDP, although the respondent appears to support the Council going ahead with a Full LDP review in advance of a SDP.</p>	<p>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 revision or a full revision. The RR to be amended to further address the issues of joint working and relationship with the SDP.</p>
56.4	Monmouth Town Council (Late Rep)	Full	<p>Given the above a full revision needs to be considered</p>	<p>It is noted that the respondent supports a Full revision of the LDP.</p>	<p>RR to be amended to make a recommendation on whether or not the LDP spatial strategy needs revising and to consider the implications for the form of any LDP revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
57.3	Usk Town Council (Late Rep)	Full		It is noted that the respondent supports a Full revision of the LDP.	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 revision or a full revision.
60.4	St Arvans Community Council (Late Rep)	No Revision	See previous answer on failed objectives.	It is noted that the respondent supports no revision of the LDP.	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 revision or a full revision.
2.3	Pontypool Park Estate	Short Form		It is noted that the respondent supports a short form revision of the LDP.	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 revision or a full revision.
3.5	Trustees of the Late Mrs H M Langham	Short Form	Policy SAH11 needs to be revised and the Plan's residential site allocation policies amended. Main Village allocations could then potentially be "viable and deliverable". Evidence suggests this is not the current case.	It is noted that the respondent supports a short form revision of the LDP, the main concern appearing to be the failure of Main Village sites to come forward.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
11.5	Mr Paul Cawley	Short Form	Will allow the Authority to consider and supplement the LDP with new sites resolving many of the issues the Authority currently has in respect of the target of 4500 dwelling by 2021.	It is noted that the respondent supports a short form revision of the LDP, although this seems to contradict the respondent's view that the spatial strategy needs revising, which is unlikely to be appropriate for a short form revision. A short form revision would have to extend beyond 2021 as there is a requirement to have a 10 year plan period at adoption.	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 revision or a full revision.
26.5	Cllr Louise Brown	Short Form	If the population projections are lowered as 2008 figures are too high then instead of just a 4 year supply this may then bring it in line with a 5 year supply without the necessity for a full revision, so a short revision would do and would mean that the allocated sites were sufficient without looking for additional sites.	It is noted that the respondent supports a short form revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
31.5	Mr Adrian Lewis	Short Form	Revision for population growth and housing demand and distribution of affordable homes. It would help residents to understand the split within affordable homes such as tenants that have a vested interest in the value of the property and those who are on rental paid by welfare or otherwise. The largest anti-social issue, as I understand it, come from the latter group. Increasing their number will effectively be against the LDP vision that people live in more inclusive, cohesive, prosperous and vibrant communities. The greater the concentration of rental homes has the potential to create a 'ghetto' environment of anti-social behaviour.	It is noted that the respondent supports a short form revision of the LDP. The Affordable Housing SPG sets out details of the type of affordable housing preferred in Monmouthshire, which is 'tenure neutral' offering flexibility between social rent and low home ownership.	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 revision or a full revision.
32.5	Mr Rees Williams	Short Form	The majority findings are acceptable but again housing / land requirements need correction.	It is noted that the respondent supports a short form revision of the LDP to deal with the housing supply situation.	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 revision or a full revision.



Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
37.5	Abergavenny & District Civic Society	Short Form	<p>Extension of the plan to 2026 appears to be adequate at present, if Welsh Government will allow this. A short revision is unlikely to require substantial allocations of new housing land or a new spatial strategy, but it may enable some other revisions and would avoid a policy vacuum. It also provides breathing space for regional and inter-regional needs to be assessed, including those arising from the removal of Severn bridge tolls, and possibly for a modified spatial strategy to be put forward in a subsequent full revision. Note that the council is expected to respond on joint LDP revision with neighbouring authorities and a SE Wales Strategic Development Plan. Considerations of cost, capacity and speed underlie the Secretary's invitation. The draft Review deals with such considerations rather inadequately: the justifications for rejecting joint planning with neighbouring authorities are limited and rather weak, failing to address the fact that local housing market areas cross boundaries. Furthermore, the report does not explain the reasoning behind the Welsh Government advice that a short revision would not be supported. Due to the political and practical challenges of collaboration do not believe that a joint LDP revision</p>	<p>It is noted that the respondent supports a short form revision of the LDP. The RR will be amended to further address the issues of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.</p>	<p>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 revision or a full revision. The RR to be amended to further address the issues of joint working etc.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
			<p>could be adopted in time to avoid a policy vacuum after 2021, and therefore support a speedy short revision to extend the Monmouthshire LDP to 2026. This would allow time to make progress on a SE Wales Strategic Development Plan providing a context for a joint LDP with neighbouring authorities extending to 2036. However, fear that a joint LDP will be less tuned to the needs of Monmouthshire's towns and countryside and that the people of the county will have less influence on the plan's policies and proposals. Place Plans for towns and villages will be more important .</p>		
40.5	Magor with Undy Community Council	Short Form	<p>As the objectives of the LDP already meet or are compatible with the Well-Being of Future Generations Act and the Local Well-Being Plan, the short form revision will allow the Authority to fast-track consideration of, and supplement the LDP with new sites resolving many of the issues they currently have in respect of the target of 4500 dwellings by 2021</p>	<p>It is noted that the respondent supports a short form revision of the LDP. However, the respondent considers that the spatial strategy should be revised which would require a full revision.</p>	<p>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 revision or a full revision.</p>

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
50.5	Mrs Evelyn Birden (Newland Rennie)	Short Form	In the main the policies remain relevant subject to comments made.	It is noted that the respondent supports a short form revision of the LDP.	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 revision or a full revision.
51.5	Dr David Rosser (Newland Rennie)	Short Form		It is noted that the respondent supports a short form revision of the LDP.	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
55.4	Abergavenny Transition Town (Late Rep)	Short Form	LDP needs some revision. It is reported that Welsh Government (WG) suggests a Short Review is not acceptable but no rationale is given for that position. This needs to be made explicit for it to be considered. Aware of WG's merger/ joint-working pressures for the 22 authorities in Wales. The decision of whether to go for a Short or Full Revision has to be taken in the light of this ongoing policy debate and its likely timescale of resolution. Also the ending of the Severn Bridge Tolls, and the roll out of the Metro project will inevitably have considerable mid-term impacts on the county. These need to be mapped, researched and understood on a regional basis, but this will take time. Equally there is work to do on a South East Wales Strategic Development Plan, another joint venture which also takes time.	<p>It is noted that the respondent supports a Full revision of the LDP. The Welsh Government (WG) has indicated in that it will not support a short form revision for the following reasons: 'The AMR indicates that the delivery of housing is falling well below the anticipated annual rate and the strategic sites are not being delivered as planned (in terms of timing). The combination of these two issues appear as going to the heart of the plan which would not merit a short form review procedure; A short form revisions would be a high risk strategy in terms procedurally, potentially raising questions of 'soundness' and placing adoption of the plan at high risk'.</p> <p>Nevertheless, the regulations allow for a short form revision and it is considered necessary for the RR to address this and leave the option open. To avoid unrealistic expectations it was considered necessary to flag up that a short form revision is unlikely to be acceptable to the WG.</p>	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 revision or a full revision.

Rep No	Representor	No Revision/Short Form/Full	Comment	LPA Response	Recommendation
55.4		Short Form	<p>Not convinced by the rather weak arguments against joint planning with adjacent authorities in the Draft Review, given that many of the forces at work do not respect county boundaries . Should some collaborative planning work inevitably be done at a more regional level at some point in the future, this will necessitate an urgent putting in place of mechanisms to protect 'localism' now, in the short term. As the centre of policy decision-making on planning inevitably moves to a more strategic level, before such merger work comes about, proper Place Plans, Urban frameworks for sites in main settlements, more town-by-town careful analysis of employment and housing needs, more town visions, urgently have to be put in place to ensure a sound civic ownership. This can be done by a Short, focussed, Review process. It will also allow some of the recent submissions on the MCC Well Being Plan, that have been sent in parallel to this process, to be considered in the light of the above. All these things lead to the conclusion that a Short Review is the best option, so that some critical new policies could be put in place quickly, and this would avoid a potential policy vacuum after 2021. The Short review would take us up to 2026 and a Full Review with the</p>	<p>The RR will be amended to further address the issues of joint working, regional planning etc. Procedures for community participation in any LDP review remain to be determined. To be adopted as Supplementary Planning Guidance (SPG) a Place Plan would need to support and expand on policies in an adopted development plan – ‘a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances or areas.’ (PPW, ed. 9, para. 2.3.1 . This suggests a sequential approach – an adopted LDP is followed by an adopted SPG. To be adopted as SPG a Place Plan would also need to focus on spatial matters. The relationship between any Place Plan and a revised LDP, therefore, is a matter that would require careful consideration. Whether or not the revision is a short form or full is not felt to have any implications for any such relationship, as the LDP will need to cover County wide matters, irrespective of any Place Plan production in particular communities. It would not be possible for a short form revision to cover up to 2026 as there is a requirement to ensure that there is 10 years of the plan period remaining on adoption.</p>	<p>The RR to be amended to further address the issues of joint working, relationship to regional planning etc.</p>

<b>Rep No</b>	<b>Representor</b>	<b>No Revision/Short Form/Full</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
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			other bigger picture matters clearer and resolved, could then take us through to 2036.		
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## Further Comments

Rep No	Representor	Comment	LPA Response	Recommendation
1.8	Chepstow Society	Publicity about plan and its effects has been weak. Things need to happen in the Chepstow/Caldicot area of the County as the removal of the tolls is an opportunity that should be taken up. Must be ready for an influx of new people and traffic.	Comment noted. These are matters that will be considered in any LDP revision. Consultation on the Draft Review Report is not a statutory requirement, however, we will seek to engage with communities as part of any plan revision.	No change to the RR.
3.6	Trustees of the Late Mrs H M Langham	Previous comments made in response to consultation on the Affordable Housing SPG highlight and reinforce the problems in delivery of Main Village sites. Their potential development requires amendment of Policy SAH11. The "pragmatic" approach to departure applications referred to in 3.2 .19 should be used in Main Villages, with each site considered on its merits and not bound by current policy constraints. Anxious to promote allocated site SAH11(xi) but site is not "viable and deliverable" for developers.	Comment noted. The RR acknowledges (para 3.3 .8) that there is a need to consider revisions to the rural housing policies and/or how they are implemented, although within a general context that the primary aim of the Main Village allocations is to make provision of affordable housing for local people living in the rural parts of the County. The suitability of any specific site for re-allocation or de-allocation will be a matter for any LDP revision.	No change to the RR.
4.6	Heine Planning	Council recognise policy was not informed by an up to date need assessment but fail to mention the additional site at Llancayo, since dismissed on appeal but the need for the family was acknowledged. Need to address their needs and possibly those of others whose needs were not identified including possible in migration. Clear guidelines needed of the process and timetable for new site provision.	Comments noted. The RR recognises that any LDP revision will need to give further consideration to addressing any unmet need for the provision of gypsy and traveller sites.	Paragraph 3.3.13 of the RR to be amended to refer to Llancayo.

Rep No	Representor	Comment	LPA Response	Recommendation
5.1	Tintern Community Council	Pleased to note the proposed changes in criteria with regard to housing policies, have previously highlighted several sites within the community council area which were felt to be appropriate for low-cost housing. These were discounted for various reasons but may be suitable in future if conditions have been relaxed.	Comment noted, although if the sites referred to were discounted because of detailed planning reasons then any LDP revision is unlikely to alter the position. The suitability, or otherwise, of any potential candidate site would be a matter for any LDP revision.	No change to the RR.
7.6	Mr Alan Horne	Consideration should be given to a wholesale review as to how the key objectives are met. The criteria for allocating employment land and land for homes should be reviewed. Over the past 10 years there has been a radical change in how we live our lives with the widespread delivery of broadband communications and access to the internet. The revised LDP has to step back and recognize the reality of modern living. It has to give planners flexibility to make changes in allocation of land to suit the needs of the local community, advances in technology and changes in working practices.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
9.6	SA Brain & Co Ltd	Do not consider that the Council should place too much reliance on the 2011 and 2014 projections there is a need to take an optimistic approach to population given the likely growth anticipated for Monmouthshire due to the abolition of the Severn Bridge Toll and the work being undertaken via the Cardiff Capital City Region Deal and, as such, should form part of the local housing market assessment.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.	No change to the RR.



<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
10.4	Natural Resources Wales	Section 4 – Evidence Base Studies, recommend that Dwr Cymru/Welsh Water (DCWW) are consulted to ensure the provision of foul drainage to mains public sewer on allocated sites is feasible within their AMP programme. This will help prevent delays which have been experienced within the current LDP sites when connecting to the mains public sewer. Also recommend consideration is given to whether a Strategic Flood Consequences Assessment is required in accordance with section 10 of TAN15. This can assess risks and consequences of flooding across allocated sites. There is new flood data available which has been published since the adoption of the current LDP	Comments noted and will be considered in preparing evidence base for any LDP revision.	No change to the RR.
11.6	Mr Paul Cawley	Welcome the Short Form Review as it will allow landowners and developers the ability to offer up within a reasonable time-frame available land for development especially for the development of smaller clusters of dwellings eg 10 – 20. I have land available on the edge of a village development boundary for inclusion in the LDP for development	It is noted that the respondent supports a short form revision of the LDP, although this seems to contradict the respondent's view that the spatial strategy needs revising, which is unlikely to be appropriate for a short form revision. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision, although it is acknowledged that a short form revision is likely to enable such sites to be brought forward more quickly.	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 revision or a full revision.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
13.6	Ward Estates Ltd	<p>Consider that the Council should not place too much reliance on the 2011 and 2014 projections which reflect lower household formation rates during a period of recession. It is likely that the plan period will be extended to 2036 and it will be necessary to take into account a revised Local Housing Market Assessment, the Cardiff Capital Region City Deal and Future Monmouth. It is also likely that with the abolition of the Severn Bridge Toll the County will become a more popular place to live with higher levels of in migration. If insufficient account is taken of this pressure house prices will rise at a disproportionate rate and make it more difficult for local people to afford housing. The LDP Housing Requirement will therefore need to take a wide range of factors into consideration and not rely solely on the latest household projections.</p>	<p>Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections will be a matter to be considered in any LDP revision.</p>	<p>No change to the RR.</p>
14.1		<p>With regard to the specific corporate plans, strategies and priorities, given the close geographical relationship with neighbouring Local Authorities there is insufficient evidence currently expressed as to why a wider approach to planning cannot accommodate differences and commonalities. Considering issues on a wider basis could place the authority in a much stronger position to resolve planning issues and better reflect how people and businesses operate on a daily basis</p>		

Rep No	Representor	Comment	LPA Response	Recommendation
14.1		<p>In terms of plan preparation timing, all parties already benefit from an adopted LDP. Neither authority is starting from scratch, rather updating the existing evidence and ensuring that a combined strategy reflects the wider geographical area. It remains unclear as to why this would require an elongated preparation time, even taking into account a slightly modified governance structure. Efficiencies should also be reflected in a governance approach. Again, this area will require further explanation and evidence as to why a Joint LDP is not appropriate</p>		
14.1		<p>Currently consider the Review Report inadequate regarding the evidence to support progressing a replacement LDP on an individual basis.</p>		

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
14.1	Welsh Government	In light of the recent Written Statement and the letter from Lesley Griffiths AM, specific to Monmouthshire, wish to draw attention to the need to provide a robust analysis of the benefits of preparing a Joint LDP. Note that already undertake a large degree of joint working on the evidence base transcending administrative boundaries, but not clear why this cannot be translated into a Joint LDP. The ability to prepare a more holistic and consistent policy approach, following a single administrative process, should offer the ability to make a more effective and efficient use of resources and provide better planning outcomes across the wider area. If wish to retain single LDP approach a much more robust analysis illustrating clearly why such an approach would be more prudent than preparing a Joint LDP, both in terms of resource requirements and planning outcomes is required.	Comments noted. The written statement and letter from the Cabinet Secretary for Energy, Planning and Rural Affairs was received after the Draft Review Report was published for consultation. This matters contained in the written statement and letter will be addressed in the Review Report,	The RR to be amended to address the issues raised by WG.
16.6	Bovis Homes (Walsingham Planning)	In the context of a full revision of the LDP, which will need to identify new sites for housing, submit proposals to demonstrate that there is a robust planning case for the removal of the Green Wedge in respect of land to the west of Chepstow (to north of the A48) and the allocation of land as a strategic housing site.	The suitability, or otherwise, of any potential candidate site will be a matter for any LDP Revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
17.1	Goetre Fawr Community Council	There is much talk about other national plans in the document and a sense that there is lots of expansion of housing planned. The one area it appears to lack substance in is protection of the natural environment rather than exploiting what it has to offer which are two different things. Rural life is altering beyond most peoples expectations, there is little thought to accommodate those people who may not wish to be online for services. The sort of people who live in the village. What is in the plan that gives a 'quality' to a life lived in wales? The only focus is building more and more homes with little correlation to the resulting impact on health and social care services that will be required and education. Would like to see more emphasis on protecting the environment and reducing waste for future generations.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
18.1	Ministry of Defence	No specific comment to make	Noted.	No change to the RR.
19.1	National Grid	No comment to make	Noted.	No change to the RR.
20.6	Hallam Land Management (Asbri)	With regard to Section 4, the need to undertake urban capacity studies is of particular importance. Such studies should consider the capacity for growth of the main towns, with reference to the constraints which apply, and identify appropriate 'preferred directions' where future housing development should be accommodated. This could form a basis for the release of sites coming forward in advance of the replacement LDP and would inform the assessment of Candidate site submissions.	Comment noted. These are matters that will be considered in the preparation of the evidence base for any LDP revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
21.6	Hallam Land Management (Boyer)	The Consultation Document refers to the WG Household and Population projections with the latest forecasts showing much lower levels of growth than the 2008 projection on which the LDP is based. The latest household projections are based on a short term trend of 5 years where households have formed a much lower level than anticipated therefore do not consider that the Council should place too much reliance on the 2011 and 2014 projections which reflect lower household formation rates during a period of recession. It is likely that the plan period will be extended to 2036 and it will be necessary to take into account a revised Local Housing Market Assessment, the Cardiff Capital Region City Deal, Future Monmouth and abolition of the Severn Bridge Tolls the LDP Housing Requirement will therefore need to take a wide range of factors into consideration and not rely solely on the latest household projections.	Comment noted. The appropriateness, or otherwise, of the more recent Welsh Government population and household projections, together with contextual issues such as City Deal and the abolition of the Severn Bridge charges, will be matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
22.6	Redrow Homes	The Review Report recognises that housing completions in Monmouthshire since 1981 have varied with a notably lower rate in the last 10 years. The significant factor being the recession and peoples' ability to get on the housing ladder, households increasing in size etc. It would be dangerous to set a lower housing requirement without considering the realistic impacts of the economic climate over this period and looking forward. Nearby authorities have seen a surge in completions in recent years because deliverable sites were allocated in their development plans. The employment requirements and job delivery needs to be carefully considered with housing requirements. A knock-on effect of not setting a realistic housing requirement would be further difficulty to deliver much needed affordable homes given the correlation with private housebuilders developing strategic allocations.	Comments noted. The future level of housing growth will be a matter for any LDP revision.	No change to the RR.
22.6		Agree that preparing a joint LDP with neighbouring authorities would not be efficient or appropriate. An SDP will provide the suitable regional consideration as the direct tier of plan direction above that of LDPs. The introduction of the SDP may allow further collaborative working in future LDPs but undertaking joint LDPs now is highly likely to delay getting appropriate plan-led controls in place to guide development locally.	Comments noted. The RR will be amended to further address the issue of joint working etc., although the respondent appears to support the Council's current position that a joint plan is not appropriate at the present time.	The RR to be amended to further address the issues of joint working etc.

Rep No	Representor	Comment	LPA Response	Recommendation
23.6	Richborough Estates (Turley)	<p>Whilst we support a review of the housing requirement, it is important that the failure of the existing strategy to deliver sufficient housing growth is not seen as justifying a reduced future housing requirement. The appropriate housing requirement for the extended plan period should be based on a detailed and up to date evidence base. This evidence base should not rely solely on levels of projected household growth suggested by the latest 2014-based household projections as the projections for Monmouthshire are likely to significantly underestimate likely future household growth. Due consideration should be given to projections which account for longer term trends. It is also important that the housing requirement reflects wider economic drivers and aspirations (including the Cardiff Capital Region and City Deal).</p>	<p>The future level of housing growth will be a matter for any LDP revision. There is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates.</p>	No change to the RR.
23.6		<p>The LDP Review is being progressed in the context of the failure of the existing plan to deliver sufficient levels of housing (both market and affordable). Given the timescales for completing the LDP Review, it is important that the Council maintains its pragmatic approach to determining residential applications, this approach will make an important contribution to housing supply in the interim period.</p>	Comment noted.	No change to the RR.



Rep No	Representor	Comment	LPA Response	Recommendation
24.6	Mrs Carolyn Ovenden	<p>The proposal to extend the period of the Plan to 2036 is ridiculous. It is impossible to know the nation's circumstances in 18 years time. Specifically why give glamping so much consideration it will probably be out of date in 18 years time. Renewable energy policies need to be under constant review, not re-assessed only when an LDP is being drawn up. The current waste disposable plan is already out of date. Can future housing requirement really be assessed at present, the original LDP got it wrong and there is current potential for great change. The results of this review will not enhance the heritage and countryside of Monmouthshire by suggesting that house-building will take place on previously-designated green spaces and by taking amenity land. Has the Historic Environment Act 2016 been fully considered. Why delete the flood risk policy, it is vital to have one specifically for Monmouthshire's many endangered low-lying areas, which national policy appears to pay little attention to. Telecommunications do not function effectively throughout the county. Many public rights of way need evaluating. Who comprises the Officer Working Group and will any minor amendments they deem necessary be placed in the public domain.</p>	<p>It is recommended that a revised Plan period should cover a period of 15 years with a start date of 2018. This allows four years for Plan preparation and ensures the required ten year period from the date of Plan adoption. This would result in a Plan running from 2018 to 2033, which aligns with Torfaen's proposals and enables a consistent (and where appropriate, joint) evidence base with collaborative working. However, this end date may require amending to align with the SDP. The other issues raised are matters generally to be considered in any LDP revision. The suggested removal of Policy SD3 is in accordance with generally accepted practice that LDP policy should not repeat national planning policy and should be in consistent with it. Sufficient control over development in flood risk areas is provided by Technical Advice Note 15. The current LDP policy is not consistent with national policy - in some aspects it is more lenient and in others it is stricter. This inconsistency is not a satisfactory situation. Any proposed revisions to LDP policies will be subject to public consultation.</p>	<p>RR to be amended to clarify the proposed plan period.</p>
26.6		<p>The Welsh Government, MCC, Forest of Dean and Gloucestershire and the Health Board need to urgently get together to resolve the infrastructure problems of Chepstow which are only likely to get much worse once the Severn Bridge tolls go at the start of 2019 and there is a 20% increase in Chepstow traffic.</p>	<p>Comment noted. This would be a matter for any LDP revision. Liaison with neighbouring authorities will be necessary in any LDP revision process. The Welsh Government Highways Division is also consulted on matters relating to the A48 Trunk Road and associated development.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
26.6		The policy side of the LDP needs to include a halt on development where it will impact air quality.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6		The LDP should place a moratorium on building in Chepstow and surrounding area until the proper infrastructure is in place in terms of roads, primary schools and over stretched GP services.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6		No account is taken in this LDP review of the need to consider the neighbouring authorities . Building in Gloucestershire is having a significant impact on the infrastructure in Chepstow and account needs to be taken of their building programmes, not only currently but in future as well. Any LDP is short sighted if it just considers the South Wales area. It is vitally important that Monmouthshire considers the surrounding English Counties in its LDP.	Comment noted. Liaison with neighbouring authorities will be necessary in any LDP revision process.	No change to the RR.
26.6		Employment land allocation needs to be further considered in relation to attracting new businesses across the whole of Monmouthshire.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.
26.6	Cllr Louise Brown	Strongly disagree with any additions to sites in main villages and do not believe that there is any need for additional sites beyond those already in the LDP.	Comment noted. The location and scale of any new housing allocations would be a matter for any LDP revision.	No change to the RR.
26.6		There is insufficient infrastructure in Chepstow and surrounding areas to allow for any further development.	Comment noted. This would be a matter for any LDP revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
27.1	Gareth Smith	Strongly object to any amendments which would increase the number of general market and affordable housing on the Crick Road development site. It would be unjust to impose further obligations on the Crick Road development as a result of the Council's failure to ensure that other development sites fulfilled their quotas of general market and affordable homes. There appears to be no changes to existing infrastructure and no additional infrastructure to support the development as it stands let alone any further increase in housing numbers.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
28.6	Llangybi Community Council	It is clear that the suitability of some housing sites need to be reassessed. For example, since Llangybi was assessed as a main village suitable for a development of 10 houses, it no longer has a shop/post office and the bus service has been significantly reduced. In addition, approval has been given for a separate development of 8 dwellings on a site in the village, putting additional pressure on the village infrastructure.	Comment noted. The suitability of any specific site for re-allocation or de-allocation will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
29.1	Monmouth 2020 Vision Group	Find the report well written, informative, balanced and objective in its review of the operation of the LDP. On the question of a full or short form revision, there are five reasons to suggest a full revision of the LDP. However, say it is essential to have effective community participation in any revision and are very concerned that the long timescale to take a fully revised LDP to adoption will make it extremely difficult for the community participation in the process to be effective. If the following changes can be addressed without fundamentally altering the overall direction of the Adopted Plan, then a short form revision over a much shorter timescale is preferable from a community point of view.	It is noted that the respondent does not express a specific preference between full or short form LDP revision, being influenced by opportunities for community participation. In this respect, a longer time period does allow more time for pre-deposit participation and enable 'front loading' in terms of community involvement in the LDP. After this stage, the regulations require more formal consultation processes that will, of necessity, be time restricted.	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 revision or a full revision.
29.1		1. Population & Housing Growth & Land Supply - The Draft Review finding is that projected population growth and housing growth by 2021 is now estimated to be less than anticipated when the LDP evidence base was drawn up. Given the ending of the Severn Bridge charges in 2019 these projections need to be revised. It is difficult to understand whether the Draft Review is saying that as a consequence total land supply for housing will also need to be revised or not, either because of increased demand and/or because of the need to increase land supply to make up for the slowness of housing completions on the existing supply.	Comment noted. The fact that the current LDP is not meeting its housing targets is a justification for LDP revision. Any such revision, however, would take into account new population projections and contextual changes, such as the lowering of the Severn Bridge charges, as referred to by the respondent. There will be a need to consider whether the existing housing targets are appropriate and how they reflect emerging trends, economic growth and aspirations. This will be a matter for any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		<p>2. Spatial distribution of housing growth and site selection - It is very important for communities to be involved in any changes in the selection of sites. In Monmouth the LDP spatial strategy appears to be on plan. There is a strong community wish to be involved in any revision of both the total housing growth in the town and the selection of sites. This must include an appraisal of the limits of growth of the town if it is to be a socially cohesive town of sustainable neighbourhoods around a network of active travel routes for school, work, leisure and shopping, rather than become a dormitory town based on high levels of commuting by car. The LDP revision must look at options for spatial distribution of whatever growth is required, including the option of providing for the development of a self-sustaining new settlement within the County.</p>	<p>Comments noted. These will be matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>
29.1		<p>3. Essential infrastructure - Whatever spatial distribution option is decided, a revised LDP must provide for any new housing growth to be matched by growth in the supply of employment, transport, education and health services and utility services.</p>	<p>Comments noted. These will be matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		<p>4. Well-Being Objectives - There is a legal requirement for all public authority service providers to take reasonable steps to maximise their contribution to the local well-being objectives. Maximising the contribution of land use policies and programmes to the local WB objectives requires a revision of the LDP. This duty goes beyond just finding a coincidence of “purpose and objectives” between the LDP and the WB Plan (3.1 .13) and requires the LDP to demonstrate in practical terms exactly how it will maximise its contribution to delivering the local WB objectives and the 17 steps set out in the PSB Draft WB Plan. To take just two examples, where does the LDP make any reference to (a) changing housing spatial standards and play provision to ensure the local WB objective to “provide children and young people with the best possible start in life” and (b) planning for renewable energy in housing developments such solar panels or other technologies, to ensure the local WB objective to “protect and enhance the resilience of the natural environment whilst mitigating the impact of climate change”?</p>	<p>Comment noted. The need for the any revised LDP to contribute to delivering Local Well-being objectives is recognised.</p>	<p>No change to the RR.</p>

Rep No	Representor	Comment	LPA Response	Recommendation
29.1		<p>5. Place Plans - The Planning (Wales) Act 2015 introduced the option for planning authorities and community councils to produce Place Plans as supplementary detail within the strategic policies of the LDP. Beyond strategic housing sites and strategic policies for place-making, the current LDP does not deal with settlements in a holistic or detailed way. The Monmouth 2020Vision Group is looking at Monmouth as a whole economic, social and environmental place, setting out future options and the ways to deliver a chosen option, based on public participation. This will provide a base for the production of a Place Plan to be produced by the Town Council. It may be that as supplementary guidance to the LDP the production of a Place Plan requires only a short-form revision of the LDP?</p>	<p>Comment noted. Procedures for community participation in any LDP revision remain to be determined. To be adopted as Supplementary Planning Guidance (SPG) a Place Plan would need to support and expand on policies in an adopted development plan – ‘a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances or areas.’ (PPW, ed. 9, para. 2.3.1 ). This suggests a sequential approach – an adopted LDP is followed by an adopted SPG. To be adopted as SPG a Place Plan would also need to focus on spatial matters. The relationship between any Place Plan and a revised LDP, therefore, is a matter that would require careful consideration. Whether or not the revision is a short form or full is not felt to have any implications for any such relationship, as the LDP will need to cover County wide matters, irrespective of any Place Plan production in particular communities.</p>	No change to the RR.
30.3	Monmouth Chamber of Commerce	<p>Have concerns about Natural Resources Wales document TAN15 seemingly stopping all commercial development in the flood plain. Will be lobbying NRW when TAN15 comes up for consultation later in the year and will support any changes, which make it more like the more flexible English document PPG25.</p>	<p>Comment noted. This is a matter for national policy.</p>	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
32.6	Mr Rees Williams	The UDP/LDP process has been ongoing since 1999, with a Public Inquiry in 2004 and then followed by 10 years before the LDP was adopted in 2014. Further reforms are now proposed which according to the LDP Draft Review could take the programme up to 2036. Monmouthshire County Council set themselves exceptionally low targets which they consistently fail to achieve, and will continue to do so.	Comment noted. The level of housing growth required will be a matter to be considered in any LDP Revision.	No change to the RR.
33.6	Abergavenny Town Council	Would like to draw attention to the work of Team Abergavenny and the recent publication of North Monmouthshire Community Plan. This group together with the Town Council should be key stakeholders during the revision of the LDP.	Comment noted. Procedures for community participation in any LDP revision remain to be determined, although the importance of the Abergavenny Town Council and Team Abergavenny is recognised.	No change to the RR.
35.1	Dwr Cymru Welsh Water	Capital investment in water and sewerage infrastructure is managed in 5 year Asset Management Plans (AMP). The current AMP, AMP 6, runs from April 2015 to March 2020 and AMP7 will run from April 2020 to March 2025. The AMP, along with delivering essential investment in infrastructure from an operational and maintenance perspective, seeks to ensure appropriate large scale investment is undertaken to provide capacity for new development and growth. Would encourage continued engagement as the Council progress the first review of the LDP in line with advice contained within the LDP Manual. This will enable information on the capabilities of the infrastructure to accommodate growth to help inform the revision of the LDP.	Comment noted. The respondent will be engaged throughout any LDP revision process. The importance of necessary water and sewerage infrastructure is recognised.	No change to the RR.



Rep No	Representor	Comment	LPA Response	Recommendation
37.6	Abergavenny & District Civic Society	Would have been helpful to explain that the 'review' is only an assessment of the performance of the present plan and that this will lead into plan 'revision'.	The scope for confusion over the terms 'review' and 'revision' is acknowledged. The RR does try to distinguish between the full review now being carried out - to be followed by a LDP revision if considered necessary.	RR to be amended to provide further clarification over 'review' and 'revision'.
38.1	Edenstone Homes	<p>Comment that:</p> <p style="text-align: right;">SAH11 (xv)</p> <p>Land adjacent to Trellech School – 15 units have already been successfully delivered in 2016/2017. The balance of the allocated site has the potential for 10-15 additional units and should be allocated in the plan review.</p> <p>SAH8 Tudor Road, Wyesham – The site is allocated for 35 units although pre-application discussions have shown that the capacity of the site is much greater. The site should be re-allocated in the plan review for circa 65 units.</p> <p>Major's Barn, Abergavenny – This site comprises land off Old Hereford Road and land off Hillside. The site should be allocated in the plan review for circa 250 units.</p>	The suitability, or otherwise, of any potential candidate site or of changes to existing site allocations will be matters to be considered in any LDP revision.	No change to the RR.
39.6	Home Builders Federation	4.2 The list should include a 'review of existing sites deliverability'. Appendix 1 Table 4 (and others) would benefit from a colour coded system to identify those built or being built, those with planning but not started and those without planning.	It will be necessary to consider the deliverability of existing and proposed sites. This will be done as part of the candidate site assessment process in any LDP revision.	RR Table 4 (Appendix 1) to be colour coded for ease of reference.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
42.4	Stephen Arnell	Consider that the LDP is no longer fit for purpose. It still wrongly interprets 'sustainability' by distributing residential development predominantly around towns because of their transport links and services, and to reduce reliance on the private motor car. This is out of date, it takes no account of current and future changes in technology, e.g. polluting cars being replaced by electric/hybrid/hydrogen fuel cell cars, banning new petrol and diesel cars by 2040, increasing electricity generation from renewables, the internet and its effect on the way we work and shop. These advances allow a more even distribution of residential development between towns and villages meaning more choice, which will be necessary to help attract inward investment when the Severn Bridge Tolls are abolished at the end of 2018 and help sustain the local village schools etc. The LDP Review must take account of the effects of these and any other changes that can be reasonably foreseen on its vision and policies.	Comments noted. These are matters to be considered in any LDP revision.	No change to the RR.
43.1	The Coal Authority	Monmouthshire County Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 1.25% of the Council area. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.	Comments noted. It is assumed that the respondent is referring to the Monmouthshire County Council administrative area rather than the local planning authority area. This matter will be clarified with the respondent.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
43.1		Note that this is an early stage in the review process and have no specific comments to make on the contents of the report. The Coal Authority provides downloadable data to the LPA in respect of Surface Coal Resource and Development Risk plans, this data is updated annually, would expect the LPA to assess any future allocations against this data in order to identify any areas of risk, resource or constraint, early in the process	Comments noted.	No change to the RR.
43.1		<p>Monmouthshire County Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Within the Monmouthshire County Council area there are approximately 181 recorded mine entries and around 23 coal mining related hazards have been reported to The Coal Authority. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable</p>	Comments noted. It is assumed that the respondent is referring to the Monmouthshire County Council administrative area rather than the local planning authority area. This matter will be clarified with the respondent.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
44.1	Theatres Trust	<p>Strongly recommend that the new LDP explicitly supports arts and culture at all levels to benefit the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Recommend the inclusion of policies which protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments. Culture is included as a well-being goal within the Well-being of Future Generations Act 2015 and thus should be reflected within Monmouthshire's Local Well-being Plan. In turn, paragraph 2.1.7 of Planning Policy Wales Edition 9 (November 2016) states this should provide the overarching strategic framework for other plans and strategies including the LDP. Culture and community facilities helps develop a sense of place and makes communities unique and special. It contributes to the vibrancy of town centres, the tourist and night time economy and supports the day to day needs of local communities and helps promote well-being and improve quality of life. There is a growing awareness of the role that the arts and culture play in attracting and retaining residents and a skilled workforce.</p>	<p>Comments noted. These are matters to be considered in any LDP revision.</p>	<p>No change to the RR.</p>

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
45.6	Bovis Homes Group (Lichfields)	Consider that it is important that the review of existing housing site allocations is undertaken with regard to the specific reasons as to why each individual allocation has not come forward. The proposed housing allocation known as Land at Vinegar Hill, Undy (allocation reference SAH6) has been delayed due to the Welsh Government's (WG) proposal to create a M4 relief road around Newport. Reaching agreement with the WG has resulted in delays with progressing a planning application at the site. However agreement now ensures that the housing allocation can be delivered in the short term (next 5 years) and make a meaningful contribution towards meeting the Council's housing need.	The RR acknowledges that there is a need to re-assess undelivered housing allocations and the respondent's site specific comments are noted. This will be a matter for any LDP revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
46.6	Llanover & Coldbrook Estate (LRM Planning)	The existing approach to development at settlements has been overly restrictive and it is likely that it will need to be refined with growth being encouraged in a wider range of settlements in order provide an appropriate and deliverable supply of land for housing. The list of settlements where growth is to be encouraged is likely to need to increase to ensure a robust supply pool, there may have been changes to settlements that would have improved their level of sustainability and it is important that housing is facilitated at such locations in order to sustain the long term economic viability of these villages. It is fundamentally important to define an adequate and continuous supply of available and suitable land to meet the needs of the Plan area: 1. immediate deliverable sites of 15 to 150 dwellings (approximately), that would be achievable within the 5 year period and help to remedy any short term deficiencies; and 2. larger longer term allocations extensions – that would deliver in the new plan period (2021 to 2036). It will also be important to ensure that opportunities for other uses such as employment are identified in order to help improve the sustainability of settlements.	Comment noted. The RR recognises that there is a need to increase the supply of housing land. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
47.6	Taylor Wimpey (Turley)	The submission is accompanied by a Housing Provision Technical Document, although it is recognised that the Council is at a very early stage in developing evidence on the scale of housing need in Monmouthshire, and its translation into a level of housing growth to be accommodated through the LDP Review and it is appreciated that as part of this consultation, the Council has not updated any of the key parts of its evidence base. It is strongly agreed that the Council will need to prepare a detailed needs assessment to inform the LDP Review.	Noted. The level of housing growth required will be a matter to be considered in any LDP Revision	No change to the RR.
48.6	Llanarth Estates (WPM Planning)	The current LDP and Draft Report does not give sufficient consideration to the rural communities within Monmouthshire. The respondent owns significant amounts of land around Llanarth that are considered suitable for development.	Comment noted. The RR recognises that the spatial strategy may need revising. This could include a reconsideration of the approach to rural areas. The suitability, or otherwise, of any potential candidate site or of any village to accommodate development will be matters to be considered in any LDP revision.	No change to the RR.

Rep No	Representor	Comment	LPA Response	Recommendation
49.1	Cadw	In general the review shows that good progress is being made but several key policy indicator targets and monitoring outcomes relating to housing provision are not currently being achieved. In regard to the Historic Environment there are currently 4 LDP policies and the review indicates that all are functioning effectively, although it is considered that minor amendments may be made to two of them. However the LDP was adopted before the Historic Environment Act was enacted in 2016 and the resultant changes to Planning Policy Wales were made. There is therefore a need for the Historic Environment Policies to be reviewed and a consideration of the need for new or amended policies to be devised in particular in regard to Building of Local Interest and Historic Landscapes.	Comments noted. The RR identifies the change in context arising from the Historic Environment (Wales) Act 2016. Any required policy changes would be a matter for any LDP revision.	Appendix 1, Table 2 Review of Development Management Policies to be amended to clarify that consideration will be given to the need to revise heritage policies in light of the Historic Environment Act.
50.6	Mrs Evelyn Birden (Newland Rennie)	In relation to affordable housing section 3.3 .5 states allocation policies require amendment and 3.3 .9 refers to lack of relevance in current policy to minor villages. Reference is made to land previously put forward in Tredunnock that is considered suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
51.6	Dr David Rosser (Newland Rennie)	Reference is made to land in Usk that the respondent considers suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.
52.6	Morris' of Usk (WPM Planning)	Reference is made to land in Llangybi that the respondent considers suitable for development.	The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.



Rep No	Representor	Comment	LPA Response	Recommendation
53.6	Barton Willmore	Support the Council's pragmatic approach to the determination of residential development sites where they are a departure from the LDP but are otherwise acceptable in planning terms . Note that the Council make reference to the 'past build rates' to calculate housing land supply within the Draft Review Report. TAN 1 is clear that LPAs should base the five year housing land calculations on the 'residual method', and would accordingly advise caution in using 'past build rates' to illustrate the Authority's supply position as this can be misleading to those reading the Report.	It considered reasonable to indicate that there is a need to consider whether the targets are appropriate in the light of, for example, the more recent Welsh Government population and household projections, the methodology for calculating a 5-year housing supply and past building rates. These are factors that suggest that the LDP needs revising, along with the fact that the current LDP is not meeting its targets or achieving a 5-year housing supply, which may necessitate additional site allocations. The future level of housing growth will be a matter for any LDP revision.	No change to the RR.
54.1	Cllr Val Smith	Do not consider proposals to develop land at Chepstow Road Raglan appropriate as construction of roads houses and domestic paraphernalia will impede natural drainage . Need to maximise capital receipts should not drive inappropriate planning proposals. Development would generate additional traffic congestion but also bring commercial enterprises and funds for community initiatives. Development of an alternative site would be more appropriate.	Comment noted. This is not a matter for the LDP revision as the site is an existing allocation in the adopted LDP and is likely to be subject of a planning application in the near future, the pre-application consultation already having taken place. These are detailed matters that would be appropriately considered under any future planning application for the development of this allocated LDP site. G302	No change to the RR.
54.2	Cllr Val Smith	Development of the Caerwent military base would be in line with Future Generations aspirations and be an opportunity to lead the way with innovative design, a different approach to peppering development across Monmouthshire.	Comment noted. The suitability, or otherwise, of any potential candidate site will be a matter to be considered in any LDP revision.	No change to the RR.

<b>Rep No</b>	<b>Representor</b>	<b>Comment</b>	<b>LPA Response</b>	<b>Recommendation</b>
58.1	Llanover Community Council (Late Rep)	Ask that the Council reconsider the proposal that land forming part of Glanus Farm, Llanfair Kilgeddin be approved as potential development land. Understand that the Inspector only agreed to it being included on the basis that the village had a Primary School. That is no longer the case. Indeed, it is anticipated that the owner of the land on which the former school is located will shortly apply for planning permission for a small development within the former school grounds. Being Infill that development will be more acceptable than the one approved in the LDP and there is no requirement for two new housing developments in the village.	The RR acknowledges that during any LDP revision process there will be a need to re-assess undelivered housing allocations that have not obtained planning permission .	No change to the RR.
59.1	R Illsley (Late Rep)	Concerned that there is a possibility of extra homes on the Crick Road site. Existing infrastructure will be swamped by new build on Crick Road and Sudbrook without additional housing.	This is not a matter for the LDP review or any future LDP revision but a detailed matter that would be appropriately considered under any future planning application for the development of this allocated LDP site.	No change to the RR.
60.5	St Arvans Community Council (Late Rep)	It is difficult to see what any Review would achieve unless and until the current LDP has run nearer its course and financial restrictions ease.	Comment noted.	No change to the RR.