

## APPENDIX 3



# Monmouthshire Replacement Local Development Plan 2018-2033

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

**Volume 8 – Affordable Housing**

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## Affordable Housing

### Strategic Policy S7 – Affordable Housing

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1196 / Torfaen County Borough Council / Support	The relatively high land values in Monmouthshire should assist in supporting the positive affordable housing target of 50% and ambition of exemplar zero carbon quality development; which are applauded. Torfaen would be interested in continuing to work with Monmouthshire to understand the details of the viability work that supports these ambitions and sharing knowledge and assumptions behind these targets.	Support welcomed.	No change required.
1356 / Welsh Government / Support	To address housing affordability, the Council will deliver 50% affordable housing on the new affordable housing-led allocations. The Welsh Government strongly supports affordable housing-led sites.	Support welcomed.	No change required.
1356 / Welsh Government / Comment	The Council has undertaken a Preliminary County-wide Viability Assessment. The affordable housing targets set out in Strategic Policy S7 of the Deposit Replacement LDP are derived from, and supported by the financial viability assessments undertaken by, or on behalf of the promoter(s) of each site allocated in the Deposit RLDP, all of which have been reviewed by BHL; and by the County wide high-level assessments. The Welsh Government supports this evidence base	<p>As noted, in accordance with Welsh Government guidance a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the</p>	No change required.

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	<p>approach. It will be for the Council to justify the robustness of its conclusions. Building on the evidence from the county wide and site-specific viability appraisals, Statements of Common Ground (SoCG) to demonstrate how public/private land can deliver this scale and mix of housing tenures and over what time period would be beneficial.</p>	<p>Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>Statements of Common Ground are being developed to inform the Examination process for allocated sites with site promoters as part of the submission documents and as evidence for examination.</p>	
1356 / Welsh Government / Support	<p>Encouraging to see that key background documents on issues including the Local Housing Market Assessment (LHMA), Strategic Site delivery and a high-level/site-specific viability appraisal have now been completed to 'front load' the process and inform the findings of the Deposit Plan.</p>	<p>Support welcomed.</p>	<p>No change required.</p>
1677 / Councillor Frances Taylor / Objection	<p>There is a quota for affordable housing, however, this does not disaggregate into quotas for providing homes for the over 50s or homes for life. The RLDP states that there is an ageing demographic yet there is no quota to ensure provision of suitable housing. There is a shortage of appropriate small scale locally sympathetic dwellings with on site community facilities. Developments ought to be located in existing communities so that residents can access local services.</p>	<p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. The RLDP seeks to ensure that new housing developments in both urban and rural areas incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of balanced communities. This includes specific consideration of the differing needs of our communities. Meeting the needs of an ageing population and those who want to live independently but require accessible or adapted accommodation is recognised in the RLDP policy framework, including policies H7 and H8.</p> <p>Policy S7 intentionally relates solely to affordable housing. However, paragraph 12.10.4 of the RLDP refers to a range of household types including older person households, as well as bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing noting these will be permitted within or adjacent to defined settlement boundaries. In accordance with Planning Policy Wales (2024), paragraph</p>	<p>No change required.</p>

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		<p>12.9.1 sets out the type of specialist housing Policy H7 refers to, this includes age-restricted general market housing, generally aimed at those over 55 as well as sheltered housing and residential care/nursing homes. This includes a specific criterion relating to access to shops, services and community facilities. Policy H7 also notes that where the proposed use falls within Use Class C3 the requirements of Policy S7 must be met.</p> <p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations included in the RLDP, and all other proposals for new housing development, must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements.</p>	
1677 / Councillor Frances Taylor / Objection	How will the Council ensure that priority is given to Monmouthshire residents with local connection for this affordable housing?	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	No change required.
1803 / Councillor Dr Louise Brown / Objection	Affordable housing suggests that 50% affordable for sites over 20, it is unlikely to be achieved but it is not clear why smaller sites are only being asked for 40%, with 1 to 4 homes only a financial contribution. 4 homes should require 2 to be affordable	1803 Cllr Dr Louise Brown Objection S7 Affordable housing policy suggests that 50% affordable homes will be required for sites over 20. This is unlikely to be achieved but it is not clear why smaller sites are only being asked for 40%, with 1 to 4 homes only a financial contribution. 4 homes should require 2 to be affordable and 3 homes 1 affordable and 1 to 2 homes a financial contribution. In accordance with Welsh Government guidance a High-Level Viability Assessment (HLVA) has	No change required.

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	and 3 homes 1 affordable and 1 to 2 homes a financial contribution.	<p>been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP consultation stage. The policy approach set out in Policy S7 reflects the evidence set out in the HLVA. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire. Paragraph 13.1.10 of the Plan provides a summary of the conclusions of the HLVA and paragraph 13.1.12 provides details of the mechanism of financial contributions.</p> <p>Section 6 of the HLVA provides detail in relation to small windfall sites i.e. less than 20 homes. It is recognised in Paragraph 6.8 of the HLVA that a lower proportion of affordable housing is viable on smaller sites than on larger sites given the economies of scale that can apply to larger sites. Paragraphs 6.9 to 6.11 of the HLVA conclude that it should be viable for sites of less than 5 homes to provide financial contributions for affordable housing off-site. It is, therefore, not considered appropriate to require affordable housing on-site for sites of less than 5 homes.</p> <p>Further detail on financial contributions will be set out in the Affordable Housing supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan. None. No change required.</p>	
1803 / Councillor Dr Louise Brown / Objection	There should be policies to stop a developer going for a lower amount at the start and then adding to it later. For example, on 5 homes they would go for 4 on this policy and then add one later. Needs to have a cumulative impact policy, so that phasing of development has the same impact in terms of affordable housing or contribution towards it.	In accordance with Welsh Government guidance set out in PPW (2024) LPAs must make the most efficient use of land and buildings in their areas. Policy S7 includes a paragraph to reflect this noting that all proposals must meet national guidance in relation to the most efficient use of land and that sites should not be subdivided or phased in an attempt to avoid on-site provision of affordable homes. Supporting paragraph 13.1.13 elaborates on this point, noting affordable housing will be required on sites below the thresholds if the Council considers there has been a deliberate attempt to subdivide or phase the site or reduce the density of the site in an attempt to avoid the threshold.	No change required.

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		<p>Further detail on such an approach will be set out in the Affordable Housing supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p> <p>It is considered that points raised are appropriately addressed in Strategic Policy S7 and supporting text. and it is not, therefore considered necessary to amend the wording of the policy as suggested.</p>	
2489 / Councillor Lisa Dymock / Objection	<p>Lack of clarity on how ambitious affordable housing targets will be met. Affordable housing proposals may not align with the specific needs of local residents. Greater affordable housing will place further strain on already over-stretched infrastructure</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP consultation stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the</p>	No change required.

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		<p>Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>Regarding the alignment of affordable housing with the specific needs of local residents, Monmouthshire County Council operates a local connections policy which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team. The Council's Housing Team also provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p> <p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable developments that provide well-connected and balanced communities. Any site specific infrastructure requirements are set out within the individual site allocation policies and are reflected in the Infrastructure Delivery Plan.</p>	
2505 / Councillor Steven Garratt / Support	We need to ensure all residents can access good quality and affordable homes.	Support welcomed.	No change required.
3118 / Councillor Meirion Howells / Support	Fully support and welcome that the Council is committed to ensuring that 50% of the	Support welcomed.	No change required.

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	<p>homes constructed on new site allocations will be for affordable housing. However I acknowledge the planned development target of 1,153 affordable homes is below the predicted Local Housing Market Assessment figure of 3,085. I understand that the High-Level Affordable Housing Viability Study demonstrates that on-site provision of 50% affordable homes is achievable.</p>		
1056 / Abergavenny Town Council / Support	Fully supportive of the affordable housing allocation for the sites in Abergavenny.	Support welcomed.	No change required.
1106 / Llanarth Fawr Community Council / Objection	<p>There is an absence of credible viability technical data to evidence that 50% affordable housing will be delivered, and without guaranteed delivery of 50% affordable housing, there is not justification for the RLDP exceeding the WG housing target of 4,275 homes plus an appropriate flexibility allowance.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In conformity with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable</p>	No change required.

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		<p>homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
1255 / Home Builders Federation (HBF) / Objection	phrase 'meet national policy guidance in relation to the most efficient use of land' considered too vague and also unnecessary.	<p>In paragraph 4.2.23 of Planning Policy Wales (2024) Welsh Government refer to LPA's needing to ensure through development plans and the development management process that they make the most efficient use of land and buildings in their areas.</p> <p>As set out in supporting paragraph 13.1.13 of the Deposit RLDP, it is considered necessary to include a reference to the most efficient use of land to avoid circumstances where deliberate attempts are made to reduce the density of sites to avoid affordable housing thresholds. It is not, therefore, considered appropriate to amend the wording of the policy as suggested.</p> <p>Further detail on The Plan's affordable housing policy framework will be set out within supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p>	No change required.
1367 / Abergavenny and District Civic Society / Comment	The official definition of 'affordable housing' is no doubt contained in Welsh Government guidance, however, some definition would be helpful clarification in this section.	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity.</p> <p>In addition to this, Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This is in</p>	No change required.

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		accordance with the definition in Welsh Government's Planning Policy Wales (2024).	
2532 / Cwmpas Community Housing / Objection	Community led affordable housing has direct relevance and contribution to the policy. Direct and overt reference to community led housing could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Monmouthshire.	<p>Any proposals for community-led affordable housing will be considered on a site-by-site basis. National planning policy guidance set out in Planning Policy Wales (2024) refers to affordable housing that is owned by community-led housing organisations where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. As it is set out in national guidance it is not considered necessary to refer directly to this type of housing in Strategic Policy S7. Any planning applications for any such proposals must adhere to Strategic Policy S7 as well as other policies set out within the RLDP.</p> <p>It is not, therefore, considered appropriate to amend the policy as suggested.</p>	No change required.
2548 / Shirenewton Community Council / Objection	Policies should provide that affordable housing development cannot proceed without a housing association and its funding being place. Without this in place the sale and occupation of the affordable housing is at risk as will be the bankruptcy of the developer.	<p>Supporting paragraph 13.1.8 to Strategic Policy S7 provides detail of how affordable housing will be managed, noting that the Council requires affordable housing to be managed by a Registered Social Landlord approved for development, or by the Local Authority</p> <p>to ensure that dwellings remain affordable in perpetuity. Section 106 agreements will be utilised at the planning application stage to secure affordable housing.</p>	No change required.
3454 / Chepstow Society / Comment	Want to be assured that affordable housing remains accessible and affordable to that community sector and does not transform to unaffordable being sold off. It is not clear if there is any provision for affordable rental property	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In contrast, market house prices are determined by a range of market factors.</p> <p>In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford</p>	No change required.

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		market housing, both on first occupation and for subsequent occupiers. This is in accordance with the definition in Welsh Government's Planning Policy Wales (2024).	
3591 / Monmouth Town Council / Support	Support affordable housing in Monmouth.	Support welcomed.	No change required.
3602 / Llanbadoc Community Council / Objection	Concerns that the policy is unachievable based on the 50% rule. This is too high as a percentage so is deemed undesirable for developers to adopt as this affects the profit available. This could affect the viability of the plan overall, unless a different percentage option can be made available.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy.</p>	No change required.

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		Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.	
3902 / Usk Civic Society / Support	Supports the policy of providing a high proportion of affordable housing in any new development.	Support welcomed.	No change required.
3562 / Gateway to Wales Action Group / Objection	State if affordable housing is needed should build affordable housing only and allocate sites for housing associations. Suggest 50% affordable housing is not sustainable for the developer. State there is no example in Wales of this level of social housing being achieved.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework, with the provision of essential affordable housing at pace and scale being a fundamental objective.</p> <p>While there may be no examples to date in Wales of any local authorities delivering 50% affordable housing on all of their allocated housing sites, Welsh Government support this approach. In their representation on the Deposit RLDP WG note that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p>	No change required.

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		<p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan. As a result, this evidence confirms the allocated sites can be delivered at a rate of 50% affordable housing.</p>	
3562 / Gateway to Wales Action Group / Objection	<p>Suggest only 4% of those on the social housing waiting list seek shared equity properties not 17% proposed, suggest developing a site with wrong parameters will lead to issues with developers.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>As noted in paragraph 13.1.3 the LHMA identifies the greatest need is for social rent homes but that there is also a need for low cost home ownership and intermediate rent homes. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p> <p>Site promoters for site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. The Housing team provided site promoters with an indicative housing mix to support their FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	No change required.
3562 / Gateway to Wales Action Group / Objection	<p>Concern 50% affordable housing is not realistic and that unexpected costs may appear such as sewer upgrades, mitigation measures for the Greater Horseshoe Bats, screening costs to hide the development from the Scheduled Ancient Monument and National Landscape, extra drainage costs because SuDs not effective on Phosphates and extra costs from making</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	No change required.

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	<p>houses Carbon neutral. Suggest developers can use viability assessments to keep profits to 20% and that in the past Monmouthshire County Council has accepted lower percentages.</p>	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy.</p> <p>Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan. This is a set change in approach from the first iteration of LDPs.</p>	
1301 / Melin Homes / Support	<p>Supportive of the aspiration to provide 50% affordable housing on allocations. As part of the new settlement (CS0224) proposal have demonstrated that 50% of housing can be affordable, including specific provision for key workers. Working with delivery partners Tirion, Melin and Candleston to lead on a model for delivery. They have proven track records of</p>	<p>Support welcomed.</p> <p>Comments on alternative sites are provided in the relevant section of the Report.</p>	No change required.

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	delivering a wide range of quality homes catering for all.		
1467 / Hallam Land / Comment	Acknowledge the need to accelerate delivery of affordable housing in response to local need however in unique situations such as Land at Rockfield Road which would essentially be the second phase of an outline application, it would be appropriate to have regard what is to be delivered.	<p>It is acknowledged that HA6 Land at Rockfield Road could be considered a second phase of development, however, an outline planning application has not been approved on this site (DC/2016/00870 has not been determined).</p> <p>It is recognised that the adjacent site has extant planning permission for 70 homes, including the provision of 35% on-site affordable homes which was determined in accordance with the Adopted Local Development Plan policy framework. However, all site allocations must comply with the RLDP's 50% affordable housing policy requirement to deliver much needed affordable housing in the settlement</p> <p>This site has completed a site specific financial viability assessment (FVA) to support the proposal and identifies the site is viable based on the 50% affordable housing requirement, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	No change required.
1480 / Edenstone Homes / Comment	Acknowledge the County's need to accelerate the delivery of affordable homes and are committed to working collaboratively with the Council. Edenstone Homes has previously highlighted that the quantum of affordable housing for each site should be determined by the outcome of the accompanying viability assessments in accordance with paragraph 4.2.31 of PPW. Evidence submitted to demonstrate that HA5 remains deliverable in accordance with policy S7.	<p>Welcome Edenstone Homes' commitment to working collaboratively with the Council to accelerate the delivery of affordable homes. In accordance with Welsh Government guidance a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations, including in relation to Land at Penlanlas, Abergavenny (Policy HA5), have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this</p>	No change required.

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		<p>assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>It is noted that the site promoters have reaffirmed that HA5 Land at Penlanlas Farm, Abergavenny remains deliverable in accordance with Policy S7.</p>	
1493 / Vistry Homes Limited / Objection	<p>Difficult to believe that site allocations in the RLDP will provide 50% affordable housing when the strategic site in the adopted LDP were not able to meet a lower requirement of 35%. Concerned that the viability assessment has not been robustly evidenced and is reliant on overly optimistic assumptions. Overall housing level of growth should be increased to allow overall affordable housing need to be met via a lower affordable housing requirement as a percentage of allocated sites.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. Welsh Government's requirement to demonstrate site viability and deliverability as a fundamental part of the RLDP process assists in frontloading plan preparation to inform the delivery of site allocations within the Plan. This is a set change in approach from the first iteration of LDPs.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		It is, therefore, not considered necessary to increase the level of housing growth to accommodate a lower affordable housing requirement as suggested in the representation.	
1503 / Redrow Homes (South Wales) Limited / Objection	<p>While it is understood it is a core RLDP objective to deliver much needed affordable homes Policy S7 must allow for viability to be considered. Could jeopardise the delivery of entire allocations which could result in a reduction in the delivery of market and affordable homes across the primary settlements in Monmouthshire. State there must be some flexibility to ensure necessary new homes are built. Suggest the blanket approach to 50% affordable requirement across site allocations fails to take into account the unique technical complexities of individual allocations that are required to be overcome before sites can be delivered in contrast to PPW paragraph 4.2.32. Request insertion of (subject to viability) throughout Policy S7.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework. Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>Paragraph 4.2.32 of PPW refers to consideration of viability when affordable housing thresholds/site-specific targets are set. As indicated above, the site specific</p>	No change required.

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		<p>FVAs show the allocated sites are deliverable based on 50% and other key requirements and as such this paragraph is considered to be complied with.</p> <p>In view of the above, it is not considered appropriate/necessary to include reference to 'subject to viability' in Policy S7.</p>	
1663 / Richborough / Objection	<p>Support the identification of a range of means to achieve the affordable housing target for the plan period. Note S7 should however be amended to include reference to the potential need for affordable homes to be provided off-site or a financial contribution in lieu of on-site provision as this is noted in the supporting text but not the policy itself.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The preference of the Council is for affordable homes to be provided on-site. Paragraph 13.1.11 refers to exceptional circumstances where affordable housing cannot be provided on-site, noting this might occur in situations where the management of affordable housing cannot be secured. This could be due to proposed uses such as sheltered housing or retirement home schemes. Paragraph 13.1.12 elaborates further noting this does not apply to strategic site allocations whereby 50% affordable housing must be included on all new site allocations on-site. This approach will be reinforced through Affordable Housing supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p> <p>It is considered the addition of the suggested wording into the policy would dilute what the Council is trying to achieve. The supporting paragraphs clearly state the exceptional circumstances do not apply to all sites and cannot be applied across the affordable housing policy framework as a whole. It is not, therefore considered appropriate to amend the wording of the policy as suggested.</p>	No change required.
1663 / Richborough / Objection	<p>Refers to supporting paragraph 13.1.16 noting this recognises there may be instances where viability makes it difficult to achieve the full affordable housing requirements. Suggest the supporting text recognises the Council may be willing to negotiate on the number of affordable homes to be provided but state this is not referenced in the policy wording itself.</p>	<p>Supporting paragraph 13.1.16 refers specifically to brownfield sites setting out situations that may occur given the potential for abnormal costs. The circumstances set out in 13.1.16 will not apply in the majority of cases and consequently cannot be applied across the affordable housing policy framework as a whole. It is not, therefore considered appropriate to amend the wording of the policy as suggested.</p> <p>Regarding allocated sites specifically, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable</p>	No change required.

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		<p>housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform the delivery of site allocations within the Plan. Paragraph 13.1.16 notes that it is a recognised principle that abnormal costs associated with a development should generally be reflected in the value paid to the landowner. Any abnormal costs associated with the allocated sites should be reflected in the FVA's produced to date.</p>	
1683 / Llanarth Estates / Support	<p>Supportive of the aspiration to provide 50% affordable housing on allocations. As part of the new settlement (CS0224) proposal have demonstrated that 50% of housing can be affordable, including specific provision for key workers. Working with delivery partners Tirion, Melin and Candleston to lead on a model for delivery. They have proven track records of delivering a wide range of quality homes catering for all.</p>	<p>Support welcomed.</p> <p>Comments on alternative sites are provided in the relevant section of the Report.</p>	No change required.
1694 / The Stantonbury Building and Development Company / Objection	<p>The Plan is not meeting the full need for affordable housing within Monmouthshire and should be revised, increasing both the affordable housing target and the overall housing target, given that the main delivery mechanism is via site allocations. Policy S7 should include a revised affordable housing target of 3,085 as a minimum.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>If the affordable housing target was increased a higher percentage of affordable homes would need to be included on site allocations which could affect deliverability and viability as the Growth Strategy is set in Strategic Policy S1 and considered to be the most appropriate level for Monmouthshire. It is not, therefore considered appropriate to amend the wording of the policy as suggested.</p>	No change required.
1736 / Bellway Homes / Objection	<p>The delivery of 50% affordable homes on larger scale new allocations, such as East Abergavenny, will require financial</p>	<p>In accordance with Welsh Government guidance a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates</p>	No change required.

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	<p>assistance from Welsh Government. Still consider that, without the intervention of the Welsh Government, the affordable housing threshold of 50% will significantly impact site viability which runs the risk of residential sites becoming undeliverable.</p>	<p>that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
1948 / Edward Rogers / Objection	<p>Must be balanced with viability and deliverability. The 50% target is restrictive and impacts the financial viability of schemes - this has been seen in Oxford City Council which previously adopted 50% but now looking to reduce to 40%. Suggest Monmouthshire typically sees lower values than Oxford City Council, suggest the threshold should be no higher than the adopted LDP.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which is included within the background evidence reported at the Deposit RLDP consultation stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>Every Local Planning Authority has their own particular circumstances and cannot be directly compared. The viability assessments undertaken to support the RLDP are specific to Monmouthshire and, therefore, both the HLVA and site-specific Financial Viability Assessments appropriately reflect relevant land values in Monmouthshire.</p>	
1965 / Monmouthshire Housing Association (MHA) / Support	In principle, MHA support the housing policies set out in the Deposit RLDP.	Support welcomed.	No change required.
2951 / Tirion Homes / Support	Supportive of the aspiration to provide 50% affordable housing on allocations. As part of the new settlement (CS0224) proposal have demonstrated that 50% of housing can be affordable, including specific provision for key workers. Working with delivery partners Tirion, Melin and Candleston to lead on a model for delivery. They have proven track records of delivering a wide range of quality homes catering for all.	Support welcomed.	No change required.
2952 / Candleston Homes / Support	Supportive of the aspiration to provide 50% affordable housing on allocations. As part of the new settlement (CS0224) proposal have demonstrated that 50% of housing can be affordable, including specific provision for key workers. Working with delivery partners Tirion, Melin and Candleston to lead on a model for delivery. They have proven track records of	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	delivering a wide range of quality homes catering for all.		
2954 / Sero / Support	Supportive of the aspiration to provide 50% affordable housing on allocations. As part of the new settlement (CS0224) proposal have demonstrated that 50% of housing can be affordable, including specific provision for key workers. Working with delivery partners Tirion, Melin and Candleston to lead on a model for delivery. They have proven track records of delivering a wide range of quality homes catering for all.	Support welcomed.	No change required.
1366 / Carney Sweeney Ltd / Objection	Policy should note that contributions required in relation sites of 1 to 4 homes, are subject to financial viability of the proposed scheme. Furthermore, the Affordable Housing SPG is, naturally, supplementary to the current LDP, not the RLDP. We therefore reserve our position on this until such time as the new SPG is drafted and consulted on.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>In accordance with Welsh Government Guidance set out in paragraph 4.2.31 of Planning Policy Wales (2024), development plans should include either site thresholds or a combination of thresholds and site specific targets for affordable housing for both allocated and unallocated sites. PPW goes on further in paragraph 4.3.32 to note that for sites that fall below the threshold for on-site provision LPAs may secure commuted sums solely for facilitating or providing affordable housing using Section 106 agreements. It is noted that the LPA must consider site viability to ensure sites remain deliverable. Accordingly, paragraph 13.1.12 of the Deposit RLDP provides detail on affordable housing contributions in lieu of on-site affordable housing provision.</p> <p>The adopted LDP supplementary planning guidance (SPG) will not be rolled forward as policies relating to Affordable Housing have changed in the RLDP to reflect an updated evidence base and policy position. Further detail on The Plan's affordable housing policy framework will be set out within SPG associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan. This will be subject to a</p>	No change required.

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		separate consultation and there will be opportunity to comment on this as noted. It is not, therefore, considered appropriate to amend the wording of the policy as suggested.	
1383 / Taylor Wimpey / Comment	<p>Acknowledge the County's affordable housing requirement and more than willing to collaboratively work with the Council to help meet this need. At previous stages of the plan Taylor Wimpey highlighted that the quantum of affordable housing for each site should be determined by the outcome of accompanying viability assessments in accordance with paragraph 4.2.31 of PPW. While note viability evidence has been submitted and cannot disagree with the evidence provided by developers/landowners envisage the delivery of 50% affordable homes will require financial assistance from WG for it to be realistic. Taylor Wimpey therefore consider without the intervention of the WG the threshold of 50% will significantly impact site viability which runs the risk of residential sites becoming undeliverable.</p>	<p>In accordance with Welsh Government guidance a High-Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	No change required.
1410 / Mr Kevin Hall / Objection	<p>Affordable housing is required but doubt that these homes will be affordable and will go to locals.</p>	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity.</p> <p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however,</p>	No change required.

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		<p>exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	
1646 / Mr Brian Williams / Comment	<p>Policy S7 - broadly agree but given the locations chosen for the majority of new housing I'm not sure how (other than social housing) prices will be kept 'affordable' in the medium to longer term.</p>	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In contrast, market house prices are determined by a range of market factors.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. Reflecting this, Policy H8 (Housing Mix) seeks to ensure that new housing developments of 10 or more homes provide an appropriate range and mix of house types, tenure and size to assist in addressing our issues and objectives relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key</p> <p>to this, we need to therefore ensure we unlock opportunities for a range of homes, both</p> <p>size and type, to meet their needs as well as the needs of the older population.</p>	No change required.
1779 / Mrs Sandra Lloyd / Objection	<p>Para 13.1.6 includes Low Cost Home Ownership under Affordable Housing that means no protection on share equity homes. Rent increases uncontrollably and makes it unaffordable. Measures need to be put in place to prevent this.</p>	<p>Paragraph 13.1.6 of the Deposit RLDP provides a definition of Low Cost Home Ownership which correctly refers to both shared equity and shared ownership. Paragraph 13.1.7 notes that the delivery option preferred by Monmouthshire County Council will be set out in the Affordable Housing supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an</p>	No change required.

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		<p>Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p> <p>It is recognised that shared ownership homes include rents paid on top of mortgage payments and could therefore impact on affordability of such low cost affordable homes. The decision of the type and mix of affordable housing on any sites, however, sits outside the Planning process and is determined by Monmouthshire County Council's Housing Team. It should be noted that shared equity homes which involves a Registered Social Landlord providing an interest free equity loan to the home occupier is the Council's preferred Low Cost Home ownership mechanism.</p>	
1816 / Dr. Gary C. Smith / Support	Supports policy.	Support welcomed.	No change required.
1939 / Mr Matthew Hayes / Objection	No public transport infrastructure suitable to support these developments	It is not clear from the comments made which specific policy this relates to. Policy S7 provides the overall affordable housing target and approach to how this will be delivered, it does not refer specifically to any sites. Therefore, the Council is unable to respond to this representation.	No change required.
1999 / Mr Thomas Benson / Support	We should try to build as many affordable homes as possible.	Support welcomed.	No change required.
2324 / Mrs Susan Sandford / Objection	Need for new affordable homes does not seem apparent on the ground in Chepstow - only 26 out of 345 of the homes were affordable in the newly built Brunel Quarter - a brownfield site. Why do you need a greenfield site to build affordable homes	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Paragraph 3.1.6 of the RLDP refers to the site search sequence outlined in PPW (2024) which prioritises the use of suitable and sustainable previously developed land before considering greenfield sites. While there is a preference for maximising opportunities for development on previously developed land it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire. Further details on the RLDP Spatial Strategy are set out in the relevant section of the Consultation Report.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. Welsh Government's requirement to demonstrate site viability and deliverability as a fundamental part of the RLDP process assists in frontloading plan preparation to inform the delivery of site allocations within the Plan. This is a set change in approach from the first iteration of LDPs.</p>	
2616 / Mrs Sarah Turner / Objection	<p>Concern that the issue of local homes for local people has not been addressed on previous developments.</p>	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p> <p>The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes.</p>	No change required.
2684 / Dr Hopkins / Objection	<p>Affordable housing is a necessity but a more considered and detailed plan is required.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision</p>	No change required.

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		<p>of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>The Plan's affordable housing policy framework accords with national planning policy and is based on robust and credible evidence.</p>	
2706 / Miss Anna Chapman / Objection	Affordable housing sounds good but won't work because demanding too much pressure on Chepstow.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable housing developments that provide well-connected and balanced communities. Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan.</p>	No change required.
2739 / Janine Amos / Objection	Plan should specify how the affordable housing would be allocated.	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.	
2760 / Dr Geoff & Mrs Louise Walker / Objection	Whilst we are not against the aspiration to achieve as high a proportion of affordable dwellings as possible, how realistic is 50%?	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	No change required.
2815 / Mr Martin Murkin / Objection	Affordable housing should be defined with actual figures. It is nonsense that 3 figure numbers are affordable.	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>includes low cost home ownership. In contrast, market house prices are determined by a range of market factors.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. As such the Deposit RLDP includes a Housing Mix Policy (Policy H8). The intention of the housing mix policy is to go further than affordable housing alone in addressing our issues and objectives relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs as well as the needs of the older population.</p>	
2820 / Mr Peter Frood / Objection	Affordable housing is no substitute for the provision of good quality public rented housing.	<p>Comment noted, unfortunately the provision of public rented homes is outside of the control of the Local Planning Authority. Should anything change in this respect in the future Strategic Policy S7 would nevertheless support such an approach.</p> <p>Supporting paragraph 13.1.8 to Strategic Policy S7 recognises this and provides detail of how affordable housing will be managed noting that the Council requires affordable housing to be managed by a Registered Social Landlord approved for development, or by the Local Authority to ensure that dwellings remain affordable in perpetuity. Section 106 agreements will be utilised at the planning application stage to secure affordable housing.</p>	No change required.
2993 / Mr Gareth Peel / Comment	Ensure that any affordable housing has a local connection clause.	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.	
3063 / Mr Peter Hudson / Support	Support the need for affordable housing. There needs to be an appropriate mix of housing - primarily 1-2 bedroom houses- due to demographics.	Support welcomed. As noted in paragraph 13.1.4 the LHMA identifies the greatest social rent need is for one-bed homes. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.	No change required.
3075 / Mr David Neal / Objection	Affordable housing should be targeted towards Monmouthshire residents, especially those who have been on the wait list for unacceptable periods of time.	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.  The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.	No change required.
3215 / Jonathan (Jonty) Pearce / Objection	Do not believe that 50% Affordable Housing could be delivered.	The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.  Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.  In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the	No change required.

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		<p>delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3278 / Miss Susan Griffiths / Objection	No more housing	<p>In accordance with Welsh Government guidance set out in Planning Policy Wales (2024) the planning system must identify a supply of land to support the delivery of the housing requirement to meet the different needs of communities across all tenures. The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p>	No change required.
3319 / Nr A Andrew Hubert von Staufer / Objection	<p>Homeless people need homes. Compromises have to be made and officials have to be brave enough to tell their political masters they are wrong!</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>As noted in paragraph 13.1.4 the LHMA identifies the greatest social rent need is for one-bed homes which has been influenced by the significant increase in homelessness presentations since the COVID pandemic. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met. The Council's Housing Team have their own plans and policies in</p>	No change required.

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		place in relation to homelessness including a Rapid Rehousing Transition Plan which identifies four priority areas to prevent homelessness at the earliest opportunity.	
3321 / Mrs Abbie Boodeny / Objection	Objects to the affordable housing approach. Affordable housing needs strict rules/enforcement.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity.</p> <p>In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This is in accordance with the definition in Welsh Government's Planning Policy Wales (2024).</p>	No change required.
3323 / Mrs Angela Harries / Objection	Affordable to whom?	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this includes low cost home ownership. In contrast, market house prices are determined by a range of market factors.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. As such the Deposit RLDP includes a Housing Mix Policy (Policy H8). The intention of the housing mix policy is</p>	No change required.

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		to go further than affordable housing alone in addressing our issues and objectives relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs as well as the needs of the older population.	
3336 / Mrs Carolyn Chapman / Objection	MCC have not presented what they consider a strong case for the need for 50% of new build to be affordable housing. MCC also have a duty of care and should not further compromise the well-being individuals by housing them in a such a high risk environment as adjacent to an area that is recognised as being blighted by high levels of carbon emissions, further compromise their health from the negative effects of both air and noise pollution.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	No change required.

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		<p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable housing developments that provide well-connected and balanced communities. Any site specific requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan.</p>	
3340 / Mrs Cheryl Cummings / Objection	Social housing target of 50% is not achievable. Only 10% is realistic	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the</p>	No change required.

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		Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.	
3358 / Mr Craig Wooler / Objection	So called affordable housing schemes are not truly affordable to normal working people.	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this includes low cost home ownership. In contrast, market house prices are determined by a range of market factors.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. As such the Deposit RLDP includes a Housing Mix Policy (Policy H8). The intention of the housing mix policy is to go further than affordable housing alone in addressing our issues and objectives relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs as well as the needs of the older population.</p>	No change required.
3370 / Ms Deborah Hayler / Objection	Affordable housing should be offered to current residents and the young requiring support to get on the property ladder before opening up to residents outside of the housing catchment area.	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.	No change required.

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		The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.	
3376 / Mrs Diane Cox / Support	We need more housing for local people who were born here and cannot afford to buy one of these new houses that keep being built.	<p>Support welcomed. Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	No change required.
3390 / Mr Craig / Objection	Such a concentration of affordable housing has a potential for an increase in local crime and pollution in the area.	<p>There is no evidence to back this assumption. As noted in supporting paragraph 13.1.1 good quality affordable homes are important in achieving poverty reduction, equitable prosperity and supporting the best start in life.</p> <p>Strategic Policy S3 relating to sustainable placemaking and high-quality design and Policy PM1 Creating well-designed places also include criterion to ensure safe and inclusive design and safe, secure and accessible environments for all members of the community.</p>	No change required.
3423 / Mr Martin Bodle / Objection	The proportion of social housing on the development is 50/50. This proportion is above previous social/private housing. A ratio of 75/25 is the normal	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that</p>	No change required.

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		<p>Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3436 / Mr Christopher Banner / Objection	You will do whatever you want and ignore what people wish.	It is not clear from the comments made which specific policy this relates to. Therefore, the Council is unable to respond to this representation.	No change required.
3438 / Docter Alan Hudson / Objection	Would the council define what is an affordable home?	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity.</p> <p>In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure</p>	No change required.

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		mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This is in accordance with the definition in Welsh Government's Planning Policy Wales (2024).	
3443 / Mr Gary Rockliffe Fidler-Fidler / Objection	Concerns re antisocial behaviour	<p>There is no evidence to back this assumption. As noted in supporting paragraph 13.1.1 good quality affordable homes are important in achieving poverty reduction, equitable prosperity and supporting the best start in life.</p> <p>Strategic Policy S3 relating to sustainable placemaking and high-quality design and Policy PM1 Creating well-designed places also include criterion to ensure safe and inclusive design and safe, secure and accessible environments for all members of the community.</p>	No change required.
3469 / Mr Andrew Orrell / Objection	There are no jobs here, so if you need an affordable house - then you need to be able to afford to use a car all the time, for everything.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable housing developments that provide well-connected and balanced communities. Any site specific infrastructure requirements such as improvement to public transport or active travel are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan.</p>	No change required.
3472 / Andy Raynor / Objection	Doubt that 50% affordable homes is achievable; objective appears unreasonable. Unclear how affordable homes will be managed by RSLs and who will retain ownership. No assurance that RSLs are willing to take on the proposed affordable properties.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p> <p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity.</p> <p>In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. This is in accordance with the definition in Welsh Government's Planning Policy Wales (2024).</p>	

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3492 / Claire Richards / Comment	What priority will be given to Monmouthshire residents for Affordable Housing? Will there be a residency requirement?	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	No change required.
3492 / Claire Richards / Objection	What protection will be afforded shared equity homes to prevent the rent, for the rental portion, increasing uncontrollably and making living in these properties unaffordable.	<p>Paragraph 13.1.6 provides a definition of Low Cost Home Ownership which correctly refers to both shared equity and shared ownership. Paragraph 13.1.7 notes that the delivery option preferred by Monmouthshire County Council will be set out in the Affordable Housing supplementary planning guidance (SPG) associated with Strategic Policy S7. Appendix 11 identifies that an Affordable Housing SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p> <p>It is recognised that shared ownership homes include rents paid on top of mortgage payments and could therefore impact on affordability of such low cost affordable homes. The decision of the type and mix of affordable housing on any sites however sits outside the Planning process and is determined by Monmouthshire County Council's Housing Team. It should be noted that shared equity homes which relates to a Registered Social Landlord providing an interest free equity loan is the current preferred Low Cost Home ownership mechanism supported by Monmouthshire County Council.</p>	No change required.
3504 / Ms Alison Grenyer / Objection	What guarantees can be put in place that affordable homes will go to those with familial links to the area that might need support from family in terms of childcare	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness,	No change required.

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	or other support. What caveats would be put in place to avoid housing being given to people from out of area. Ensuring people born here can stay here.	<p>displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	
3509 / Dr Kate Coleman / Support	Pleased about the vast amount of affordable housing as house sizes/prices are currently not comparable with young working family needs and growth is needed in the younger working population.	Support welcomed.	No change required.
3514 / Mr Martyn Brown / Objection	Affordable takes up 50% that is not an agreed sum with developers, but it is unrealistic	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets</p>	No change required.

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		<p>set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3522 / Mrs Mary Auton / Support	<p>Supports the need for affordable housing but concerned that most will be occupied by those from Bristol commuting and therefore a lack of infrastructure to support these journeys from new developments.</p>	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p> <p>The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes.</p>	No change required.
3528 / Mr John Bennett / Objection	<p>What is actually needed, and urgently, is rented housing for those families on the very long waiting lists with MHA. Also need urgently is housing for the homeless especially the veterans.</p>	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p>	No change required.

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		The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.	
3540 / Mr Matthew Jones / Objection	Locating affordable housing in locations which are not accessible by active travel or public transport will force low income families to spend more on transport costs.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in Strategic Policy S8 to help create sustainable housing developments that provide well-connected and balanced communities. Any site specific infrastructure requirements such as improvement to public transport or active travel are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan.</p>	No change required.
3543 / Mr Paul Dalton / Objection	Where is the information? - There is no comment in the RLDP.	It is not clear from the comments made which specific policy this relates to. Therefore, the Council is unable to respond to this representation.	No change required.
3569 / Ms Anne Rainsbury / Objection	<p>Concerns affordable housing disappears after it is bought and that the area needs more developments that are for rent.</p> <p>Policy should include a proportion of the development that will remain as rental units.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In contrast, market house prices are determined by a range of market factors.</p> <p>In addition to this Appendix 12: Glossary of terms provides a definition of affordable housing noting this relates to housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford</p>	No change required.

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		market housing, both on first occupation and for subsequent occupiers. This is in accordance with the definition in Welsh Government's Planning Policy Wales (2024).	
3634 / Dr Greg Palka / Objection	<p>State the policy raises concerns regarding environmental sustainability, impact on local infrastructure, and alignment with broader climate and community goals.</p> <p>While the aim of addressing housing needs, particularly for affordable housing, is commendable, fails to balance these objectives with the need to protect the environment and preserve community well-being. Policy S7 emphasises sustainable growth, yet these developments do not align with the Welsh Government's climate goals or the principles of the Well-being of Future Generations (Wales) Act 2015, which requires long-term environmental and social considerations. Additionally, the lack of clear commitments in these policies to enforce net-zero building standards, integrate renewable energy sources, or mitigate the cumulative environmental impacts of new developments is concerning.</p>	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support the affordable housing approach set out in the RLDP. In their representation on the Deposit RLDP WG note that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>The RLDP should be read as a whole, and it is considered that Strategic Policy S4 relating to Climate Change, Policy NZ1 relating to Net Zero Carbon Homes and Strategic Policy S5 Green Infrastructure, Landscape and Nature Recovery cover these areas of concern.</p>	No change required.
3702 / Keith Plow / Support	Let's satisfy fulfilling the band of persons needing support before it is too late	Support welcomed.	No change required.
3736 / Mr Hugh Taylor / Objection	Relative to HA3 it is unlikely that a site of 146 units will be able to carry a 50% affordable housing requirement. A lack of viability.	The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.	No change required.

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		<p>Site promoters for site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. This therefore includes the site promoters for the HA3 Mounton Road, Chepstow site.</p> <p>Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3745 / Mrs Jenny Carpenter / Objection	<p>I consider this requirement to be detrimental to the need for a considerable number of houses to be built to accommodate the needs of local communities. There is a need for smaller private housing but making restrictions such as the 50% rule I believe that the other 50% will need to be higher end property to make the site profitable. I believe 30% affordable to be an acceptable mix with net zero certainly desirable but not essential. There should be no provision for the affordable homes to be part of any 106 agreements and this should be made clear with inclusion in the plan.</p>	<p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. As such the Deposit RLDP includes a Housing Mix Policy (Policy H8). The intention of the housing mix policy is to go further than affordable housing alone in addressing our issues and objectives relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs as well as the needs of the older population.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020), Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, which has informed the preparation of the RLDP. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable</p>	No change required.

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		throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.	
3748 / Ms Jill Bond / Support	Please increase the 1 and 2 bed properties where possible, along with more bungalows for the ageing Monmouthshire population. Also consider 'prefabs' prefabricated homes. These would also suit the more elderly in our community.	<p>Support welcomed, as noted in paragraph 13.1.4 the LHMA identifies the greatest social rent need is for one-bed homes. While the planning process can support the delivery of affordable housing, the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p> <p>Policy S7 intentionally relates solely to affordable housing. However, elsewhere in the RLDP Paragraph 12.10.4 refers to a range of household types including older person households. It also refers to bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing. In accordance with Planning Policy Wales (2024), paragraph 12.9.1 sets out the type of specialist housing Policy H7 refers to, this includes age-restricted general market housing, generally aimed at those over 55 as well as sheltered housing and residential care/nursing homes.</p>	No change required.
3760 / Miss Julia Brown / Objection	Where is the policy for existing residents who are suffering from pollution, congestion, half way houses and the social problems and safety they bring.	<p>Supporting paragraph 13.1.1 notes good quality affordable homes are important in achieving poverty reduction, equitable prosperity and supporting the best start in life.</p> <p>Strategic Policy S3 relating to sustainable placemaking and high-quality design and Policy PM1 Creating well-designed places also include criterion to ensure safe and inclusive design and safe, secure and accessible environments for all members of the community.</p>	No change required.
3828 / Mrs Sharon Gale / Objection	Affordable housing needs working people with jobs paying enough to support mortgages, those jobs are not in Monmouth. Affordable housing needs to enhance the lives of the people who live in Monmouth. These people deserve to drink clean water, not flood and to breath fresh	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, sites allocated in the RLDP reflect this hierarchy. The allocated sites must adhere to the placemaking principles set out in</p>	No change required.

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	air. The environment needs to be able to add to mental wellbeing not make it worse.	<p>Strategic Policy S8 to help create sustainable housing developments that provide well-connected and balanced communities.</p> <p>The RLDP should be read as a whole, and it is considered that Strategic Policy S4 relating to Climate Change, Policy NZ1 relating to Net Zero Carbon Homes and Strategic Policy S5 Green Infrastructure, Landscape and Nature Recovery cover the other areas of concern noted.</p>	
3849 / Mr Matthew Jenkins / Objection	Better than taking the countryside away	<p>It is not clear from the comments made which specific policy this relates to in the housing section. Policy S7 provides the overall affordable housing target and approach to how this will be delivered. Therefore, the Council is unable to respond to this representation.</p>	No change required.
3853 / Mrs Melanie Nicholas / Objection	Too many houses are built for people who can afford to buy, but never enough social housing	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>As noted in paragraph 13.1.3 the LHMA identifies the greatest need is for social rent homes but that there is also a need for low cost home ownership and intermediate rent homes. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p>	No change required.
3867 / Mr /Mrs White / Objection	Affordable housing policy assumes builders will not seek to make the profits they have enjoyed for years; as this is contrary to the generality of human nature, this policy seems doomed to failure.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets</p>	No change required.

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		<p>set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy.</p> <p>Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3871 / Mr L Llewellyn / Support	Fully supports measures that increase availability of social housing for local people. Believes such targets should be set at >60% (by occupant) or higher.	Support welcomed.	No change required.
3873 / Mr V G Danks / Objection	Only observation here is this whole report on new housing with an emphasis on affordability and bringing in younger people – what about making provision for the existing ageing population and disabled with the provision of single-storey dwellings and good connections thus allowing existing housing stock to be freed up for the 'young'. Again, MCC are focusing on the shiny not the reality of the County's needs.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach. In their representation on the Deposit RLDP WG note that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>The provision of a range and choice of homes, both market and affordable, in housing developments is considered essential in addressing the County's affordability issues and delivering sustainable and resilient communities that support the well-being of current and future generations. As such the Deposit RLDP includes a Housing Mix Policy (Policy H8). The intention of the housing mix policy is to go further than affordable housing alone in addressing our issues and objectives</p>	No change required.

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		<p>relating to affordability and demographic challenges. The retention and attraction of younger adult population age groups is key to this, we need to therefore ensure we unlock opportunities for a range of homes, both size and type, to meet their needs as well as the needs of the older population.</p> <p>Policy S7 intentionally relates solely to affordable housing. However, elsewhere in the RLDP Paragraph 12.10.4 refers to a range of household types including older person households. It also refers to bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing. In accordance with Planning Policy Wales (2024), paragraph 12.9.1 sets out the type of specialist housing Policy H7 refers to, this includes age-restricted general market housing, generally aimed at those over 55 as well as sheltered housing and residential care/nursing homes. This includes a specific criterion relating to access to shops, services and community facilities.</p> <p>Regarding the location of development, as stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations included in the RLDP, and all other proposals for new housing development, must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements.</p>	
3886 / Mrs Nerys Wilson / Comment	In relation to Shirenewton affordable housing should be scaled appropriately to the village's capacity. Any new developments must be small in number and designed to blend seamlessly.	<p>As stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations included in the RLDP, and all other proposals for new housing development, must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements. Shirenewton is included within the Tier 3 Main Rural Settlements, a small number of allocations in Main Rural Settlements are included in order to deliver much needed affordable homes and address rural equality and rural isolation in these areas.</p> <p>In addition to Strategic Policy S7, Policy H9 relates to Affordable Housing Exception Sites. The development thresholds for 100% affordable housing exception sites</p>	No change required.

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		have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. The threshold for Tier 3 Main Rural Settlements relates to 10 homes or less.	
3895 / Ms Pamela Robinson / Support	I applaud the requirement that 50% of homes be affordable/social and hope this will be enforced. However it is also important to free up larger housing stock by building homes appropriate for older people wishing to downsize.	Support welcomed. Policy S7 intentionally relates solely to affordable housing. However, elsewhere in the RLDP Paragraph 12.10.4 refers to a range of household types including older person households. It also refers to bungalows and innovative single storey homes which may be suitable for older person living. Policy H7 - Specialist Housing is specifically focussed on specialist housing. In accordance with Planning Policy Wales (2024), paragraph 12.9.1 sets out the type of specialist housing Policy H7 refers to, this includes age-restricted general market housing, generally aimed at those over 55 as well as sheltered housing and residential care/nursing homes.	No change required.
3917 / Mr Reginald Darge / Comment	Affordable homes should be for local people. In the past, state they think homes bought up by MHA in the past have gone to non-locals.	<p>Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p> <p>The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes.</p>	No change required.
3924 / Mr Richard Dobbin / Objection	State cannot see any reference to social (council) housing.	The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.	No change required.

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		<p>As noted in paragraph 13.1.3 the LHMA identifies the greatest need is for social rent homes but that there is also a need for low cost home ownership and intermediate rent homes. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p>	
3938 / Mr Roger Murrow / Objection	<p>Are they really going to be affordable? What about the supporting infrastructure</p>	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing. Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity. In contrast, market house prices are determined by a range of market factors.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>In addition to the HLVA, site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy.</p> <p>Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the</p>	No change required.

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		Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.	
3941 / Mr & Mrs Ruth-Olivia & David. L. Prosser / Comment	Supportive of these issues but not at Drewen farm site.	Support welcomed. Any site specific comments on Drewen Farm are considered against Policy HA7.	No change required.
3944 / Mrs Sally Benitez / Objection	Can you confirm what this means shared ownership properties or social housing rentals and how many would be rated for social housing, shared ownership or first time buyers?	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this includes low cost home ownership.</p> <p>While the planning process can support the delivery of affordable housing, the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.</p>	No change required.
3945 / Miss Samantha Haggins / Objection	If we need more affordable housing why are only 75 out the 145 are going to affordable housing when there a need for more.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>In accordance with Welsh Government guidance set out in the Development Plans Manual Wales (2020) Local Planning Authorities (LPAs) should maximise the delivery of affordable housing based on viability evidence of allocations/sites in their plan. Accordingly, a High- Level Viability Assessment (HLVA) has been undertaken for Monmouthshire, this is included within the background evidence reported at the Deposit RLDP stage. The HLVA demonstrates that on-site provision of 50% affordable homes is achievable throughout most of the County on sites of 20 homes or more. On sites of 5-19 homes, on-site provision of 40% affordable</p>	No change required.

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		<p>homes is evidenced to be achievable. The affordable housing percentage targets set out in the RLDP are, therefore, considered appropriate in order to deliver much needed affordable homes at pace and scale in Monmouthshire.</p> <p>Site promoters for site allocations have completed site specific financial viability assessments (FVA) to support their proposals and ensure their sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements, without subsidy. This therefore includes the site promoters for the HA3 Mounton Road, Chepstow site.</p> <p>Any site specific infrastructure requirements are set out within the individual site allocation policies and reflected in the Infrastructure Delivery Plan, indicative costs of any infrastructure requirements including site abnormalities have also been set out within the FVA's. In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) this assists in frontloading the process to inform delivery of site allocations within the Plan.</p>	
3946 / Mrs Sandra Irwin / Objection	Affordable can only be decided by a buyer or a mortgage lender. Would like to see clear plans about properties that can be rented from a housing association.	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes; Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this includes low cost home ownership. In contrast, market house prices are determined by a range of market factors.</p> <p>While the planning process can support the delivery of affordable housing, the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met. The Monmouthshire Homeseach website also provides information in relation to the type of affordable homes available.</p>	No change required.

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3949 / Mrs Sarah Spencer / Objection	Affordable housing and social housing developments should be concentrated on brownfield sites. Brownfield sites close to travel corridors should be looked at such as the Newhouse estate.	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Paragraph 3.1.6 of the RLDP refers to the site search sequence outlined in PPW (2024) which prioritises the use of suitable and sustainable previously developed land before considering greenfield sites, while there is a preference for maximising opportunities for development on previously developed land it is recognised in paragraph 3.1.6 and the RLDP Objectives that brownfield opportunities are limited in Monmouthshire.</p> <p>Supporting paragraph 13.1.16 to Strategic Policy S7 refers specifically to brownfield sites setting out situations that may occur given the potential for abnormal costs. Brownfield sites in some circumstances are therefore less viable and deliverable for affordable housing schemes.</p> <p>Regarding the location of development, as stated in Planning Policy Wales (2024) housing land should be located in sustainable locations. The housing and mixed-use allocations included in the RLDP, and all other proposals for new housing development, must be located in accordance with the Settlement Hierarchy listed within Policy S2 – Spatial Distribution of Development – Settlement Hierarchy, which focuses new development in the primary settlements and the most sustainable lower tier settlements.</p>	No change required.
3972 / Mrs Sue Young / Objection	Is not clear the make up of affordable social housing, are there any one bed social houses identified in the plan?	As noted in paragraph 13.1.4 the LHMA identifies the greatest social rent need is for one-bed homes. While the planning process can support the delivery of affordable housing. the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met.	No change required.
3982 / Mr Tim Crawford / Objection	We don't need more social housing in this area, there is plenty already (area not identified by representor).	<p>The delivery of affordable housing is a key national and local priority and is appropriately reflected in the RLDP's vision, objectives and policy framework.</p> <p>Welsh Government support this approach. In their representation on the Deposit RLDP WG note that there is a severe need to deliver affordable housing particularly for younger people and that the 50% affordable housing approach will ensure that Monmouthshire continues to grow in a sustainable manner based on a locally</p>	No change required.

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		<p>appropriate level of development which is compatible with Policies 1, 7 and 33 of Future Wales.</p> <p>It is not clear from the comments made which specific area this relates to. Therefore, the Council is unable to respond to this part of the representation.</p>	
3989 / Miss Tracey Meaker / Objection	Are they going to be leasehold that means they are not affordable housing?	<p>Supporting paragraph 13.1.6 sets out the definitions of affordable housing used by Monmouthshire County Council which includes Social rented housing, Intermediate housing, Low Cost Home Ownership, Neutral Tenure and Specialist affordable housing.</p> <p>While social rented homes relate to tenancy agreements, low cost home ownership gives residents the opportunity to get a foot on the housing ladder via a mortgage on a percentage of the property, with the remainder owned by the Registered Social Landlord (RSL). Paragraph 13.1.8 provides detail of how affordable housing will be managed to ensure that dwellings remain affordable in perpetuity, this includes low cost home ownership. In contrast, market house prices are determined by a range of market factors.</p> <p>While the planning process can support the delivery of affordable housing, the Council's Housing Team provide the appropriate mix and tenure based on the latest available information on the housing register at the planning application stage to ensure the needs of local residents are met. Decisions on whether affordable housing is leasehold or freehold is determined by the Council's Housing Team.</p>	No change required.
3992 / Ms Verena Evans / Support	Affordable housing is admirable	Support welcomed.	No change required.
3995 / Mrs Victoria Clark / Objection	Questions who will get the houses	Monmouthshire County Council operates a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection to the area. There are, however, exceptions where there is an overriding need for homes, including homelessness, displacement such as refugees, those escaping domestic abuse etc. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate residents' rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p> <p>The Council only has control over the designation of affordable homes. The Council cannot control who purchases market homes.</p>	

## Policy H9 – Affordable Housing Exception Sites

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1803 / Councillor Dr Louise Brown / Objection	<p>This policy needs to add that the housing built will be available to local people who have been brought up or have a local connection to the area.</p>	<p>National planning policy set out in Planning Policy Wales (2024) encourages the use of affordable housing exceptions policies to help meet affordable housing requirements and support the viability of local communities. Reflecting national planning policy criterion e) of Policy H9 refers to meeting the needs of local people with supporting paragraph 13.2.2 providing additional detail on this matter. While the planning process can support the delivery of affordable housing, the mechanisms in relation to who resides within the homes is set out within separate policies and guidance developed by the Council's Housing Team. It should be noted that Monmouthshire County Council does operate a local connections policy, which ensures that affordable homes are provided for those who reside in the local area and for those who have a strong local connection. There are, however, exceptions where there is an overriding need such as homelessness, displacement such as refugees, those escaping domestic abuse etc.</p> <p>The Council also operates a rural allocations policy specifically for rural areas which includes the Tier 2 Secondary Settlements, Tier 3 Main Rural Settlements and Tier 4 Minor Rural Settlements. The rural allocations policy provides additional criteria to demonstrate their rural local connection to a particular area. Further detail is available on the Monmouthshire Homeseach website.</p>	No change required.
1106 / Llanarth Fawr Community Council / Objection	<p>Object to policy H9 which allows for affordable exceptions site of up to 5 homes. It would be contrary to the Deposit RLDP's sustainability principles to allow such significant new housing development in settlements such as Bettws Newydd, Great Oak and Llanarth. State would fly in the face of their Minor Village status which reflects their unsustainability in terms of their lack of public transport, facilities, infrastructure etc.</p>	<p>Objective 13 of the RLDP recognises the need to sustain existing rural communities as far as possible by providing affordable homes and development opportunities to assist in building sustainable rural communities. This is reflected in national planning policy set out in Planning Policy Wales (PPW) (2024) which encourages the use of affordable housing exceptions policies to help meet affordable housing requirements and support the viability of local communities. Accordingly, the development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further information about this approach. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2. This policy identifies Bettws Newydd, Great Oak and Llanarth as Tier 4 Minor Rural Settlements.</p>	No change required.

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		While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 4 Minor Rural Settlements, any proposals must meet the other criteria set out within Policy H9 and the wider RLDP policy framework, as relevant, as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis.	
1138 / Raglan Community Council / Objection	The affordable exception sites for Tier 4 settlements would appear to be contrary to the RLDP's sustainability principles to allow such significant new housing development in settlements such as Gwehelog and Llandenny and Llandenny Walks. Raglan also has other small hamlets (Kingcoed, Coldharbour) that have not been included in these policies.	<p>National planning policy set out in Planning Policy Wales (2024) encourages the use of affordable housing exceptions policies to help meet affordable housing requirements and support the viability of local communities. Reflecting this, the development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further information about this approach. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2. This policy identifies Gwehelog and Llandenny as Tier 4 Minor Rural Settlements. Llandenny Walks, Kingcoed and Coldharbour are located in the Open Countryside, and as such affordable housing exceptions would not, therefore, be acceptable in these locations.</p> <p>While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 4 Minor Rural Settlements any proposals must meet the other criteria set out within Policy H9 and the wider RLDP policy framework, as relevant, as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis.</p>	No change required.
1305 / MHA / Comment	Consider that the wording of the policy ought to be more flexible. For instance, if a scheme for 11 dwellings at a Tier 3 settlement is shown to be sustainable and acceptable in planning terms then there ought to be provision for it to be approved rather than limited to 10. Indeed, this could be particular beneficial where there is an acute level of need.	The development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. This recognises that there may be a need for flexibility, for example where there is the overwhelming need for smaller homes. It adds that any exceedance must be agreed with the Council. It is not, therefore, considered appropriate to amend the wording of the policy as suggested.	No change required.

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1596 / MHA / Objection	<p>MHA support Policy H9 – Affordable Housing Exception Sites, however do consider that the thresholds for the thresholds set out in Criteria C (iii) 10 homes or less in Tier 3 Main Rural Settlements and (iv) 5 homes or less in Tier 4 Minor Rural Settlements needs to be increased. Often these Main and Minor Rural settlements have a significant affordable need and the increase in the allowance of both will assist in addressing this.</p>	<p>The development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. This recognises that there may be a need for flexibility for example where there is the overwhelming need for smaller homes. It adds that any exceedance must be agreed with the Council. It is not, therefore, considered appropriate to amend the wording of the policy as suggested</p>	No change required.
1663 / Richborough / Objection	<p>Support the inclusion of an exceptions policy but suggest the thresholds set out in Policy H9 are too restrictive for the higher tier settlements. State the thresholds should be increased for Tier 1 and 2 settlements to allow greater flexibility for exception sites to come forward. Suggest unduly restricting the scale could impede the delivery of such sites. State the policy should be amended to allow flexibility for the appropriate scale of exception sites to be considered on a case by case basis, taking into account the nature and character of the site and wider settlement.</p>	<p>The development thresholds for 100% affordable housing exception sites identified in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. This recognises that there may be a need for flexibility for example where there is the overwhelming need for smaller homes. It adds that any exceedance must be agreed with the Council. However, it is considered that the provision of larger sites in Tier 1 and 2 settlements, as suggested, would more appropriately be considered through the development plan process. It is not, therefore, considered appropriate to amend the wording of the policy.</p>	No change required.
1694 / The Stantonbury Building and Development Company / Support	<p>Support the flexibility that Policy H9 provides for affordable housing exception sites adjoining Tier 1-4 settlements.</p>	<p>Support welcomed.</p>	No change required.

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2280 / Candleston Homes / Support	Support the inclusion of an affordable housing exceptions policy, which provides an important tool for delivering affordable housing. No comments on criteria A, B, D or E. They seem appropriate and are typical of how such policies should function.	Support welcomed.	No change required.
2280 / Candleston Homes / Objection	Test C - concern regarding the strict use of an upper limit for the size of sites that can be permitted. May be occasions where the shortfall in affordable housing delivery is such that it can only be met through sites that are larger than the upper limit or on a single unconstrained site. Suggest that an exception element is added to the policy allow for sites to come forward in excess of the upper limits in certain circumstances, similar to approach taken in Bridgend RLDP.	The development thresholds in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Any larger schemes would more appropriately be allocated through the development plan process. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. This recognises that there may be a need for flexibility for example where there is the overwhelming need for smaller homes. It adds that any exceedance must be agreed with the Council.	No change required.
3004 / Trustees of the RHT Davies MBE Alltrust SIPP / Support	Fully support the inclusion of Policy H9 in the Deposit Plan as it provides an opportunity to further de-risk the plan in terms of affordable housing provision if residential site allocations (comprising 50% affordable homes) do not come forward as anticipated.	Support welcomed.	No change required.
3004 / Trustees of the RHT Davies MBE Alltrust SIPP / Comment	CS0151 - Former Troy Rail Yard, Monmouth: Land owner's intention to utilise Policy H9 in collaboration with a Housing Association to deliver 25 affordable homes at the Former Troy Yard, Monmouth. The site represents a logical extension to the existing settlement.	While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 1 Primary Settlements, any proposals must meet the other criteria set out within Policy H9 and the wider RLDP policy framework, as relevant, as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis and are best discussed with the Council via pre-application advice.	No change required.

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	<p>Planning application DM/2018/00640 (withdrawn May 2022) matters relating to design, siting, affordable housing and flood risk were considered acceptable. An FCA has previously been submitted with no development proposed in the flood risk areas. Site presents a viable and deliverable opportunity to deliver 25 affordable homes at a sustainable location within Monmouth.</p>		
1366 / Carney Sweeney Ltd / Objection	<p>Tier 4 settlements do not have defined settlement boundaries. As such, it is not clear how a site could 'adjoin' a tier 4 settlement and neither is it clear how it would be established that such a site 'would not otherwise be released for residential development'. Following text should be added: 'To be considered as adjoining a Tier 4 settlement, a site must abut existing curtilages forming part of the settlement.'</p>	<p>National planning policy set out in Planning Policy Wales (PPW) (2024) encourages the use of affordable housing exceptions policies to help meet affordable housing requirements and support the viability of local communities. In addition PPW notes that infilling or minor extensions to existing settlements may be acceptable, particularly where they meet a local need of affordable housing.</p> <p>While Tier 4 settlements do not have defined settlement boundaries, they do generally have a distinct settlement form with limited gaps between buildings that can be considered to be the core of the settlement that any such proposals must adjoin. All proposals for 100% affordable housing exception proposals, including those that are ambiguous, would be considered on a case- by-case basis, and it is recommended that such proposals are considered through the Council's pre-application service. In addition to this, Policy H9 contains a number of criteria that must be adhered to including criterion d) which refers to sites representing a logical extension to the existing settlement. This applies to all settlement tiers within the settlement hierarchy.</p> <p>Regarding the issue raised regarding sites that 'would not otherwise be released for residential development', the policy and wording set out within the first paragraph must be read as a whole. This reflects national planning policy guidance and relates to sites normally considered to be in the open countryside, outside settlement boundaries. For Tier 4 settlements that do not have a settlement boundary, this would relate to the built area within the settlement, any proposals would be considered on a case-by-case basis.</p>	No change required.

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		It is not, considered appropriate to add the additional wording to the policy /supporting text as suggested.	
2779 / Mrs Kaely Backland / Objection	Affordable exceptions site stated as being 5 homes or less in H9 contrary to RLDP's sustainability principles and Landscape Sensitivity and Capacity Study: Main Villages and H4 Settlements (2010), especially in Gwehelog with its restricted capacity with demonstrably poor highway access and lack of mains drainage.	<p>The development thresholds in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, this Gwehelog within the Tier 4 Minor Rural Settlements.</p> <p>While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 4 Minor Rural Settlements any proposals must meet the other criteria set out within Policy H9 and the rest of the RLDP policy framework as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis.</p>	No change required.
3836 / Steve Hoselitz / Objection	The affordable exception sites for tier 4 settlements according to Policy H9 will be for "5 homes or less". It would be contrary to the RLDP's sustainability principles to allow such significant new housing development in settlements such as Gwehelog, and again completely contrary to MCC's most recent Landscape Sensitivity and Capacity Study: Main Villages and H4 Settlements (June 2010); to the restricted capacity of the demonstrably poor highway access via the single track Wainfield Lane with its substandard accesses at both Cold Harbour and Hall Inn ends; and to the lack of mains drainage.	<p>The development thresholds in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, this Gwehelog within the Tier 4 Minor Rural Settlements.</p> <p>While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 4 Minor Rural Settlements any proposals must meet the other criteria set out within Policy H9 and the rest of the RLDP policy framework as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis.</p>	No change required.
3886 / Mrs Nerys Wilson / Objection	Housing development should prioritize reusing brownfield sites or infill plots to	3886 Mrs Nerys Wilson Objection H9 Housing development should prioritise reusing brownfield sites or infill plots to minimise impact on green spaces. New housing must respect conservation areas. In accordance with PPW12's site search	No change required.

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	minimise impact on green spaces. New housing must respect conservation areas.	<p>sequence, paragraph 6.4.7 of the RLDP notes that development proposals are expected to make full and appropriate use of land, with preference given to the development of previously developed land. Whilst this is the preference, it is recognised that there are limited opportunities for brownfield development in Monmouthshire. While growth is focused in the most sustainable settlements, it must be recognised that landscape quality and agricultural land quality are high throughout the County. The Deposit RLDP allocates those sites that are the best connected, most sustainable, best deliver placemaking and are least harmful, which has required balanced planning considerations and decisions with a preference for promoting the most sustainable sites.</p> <p>Infill development is supported in appropriate locations in the Tier 1 Primary Settlements, Tier 2 Secondary Settlements and Tier 3 Main Rural Settlements subject detailed planning considerations in accordance with policies set out in the RLDP as a whole.</p> <p>The provision of affordable housing is a key priority for the Council and is appropriate reflected the RLDP's vision, objectives and policy framework. Policy H9 relates specifically to exception sites for affordable housing only, which is in accordance with national planning policy set out in Welsh Government's Planning Policy Wales (2024).</p> <p>While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 1- 4 settlements, any proposals must meet the other criteria set out within Policy H9 and the wider RLDP policy framework, as relevant, as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis. It should be noted the RLDP also includes a specific Conservation Area (HE1) policy that must be considered for any proposals within or adjacent such designations. None. No change required.</p>	
3983 / Mr Tim James / Objection	Policy H9 affordable housing exception policy of 5 homes of less for Tier 4 settlements is contrary to RLDP's sustainability principles to allow such significant new housing such as Gwehelog, contrary to the Landscape Sensitivity	The development thresholds in Policy H9 have been set at a level considered to be proportionate to the size of each of the settlement tiers in the hierarchy. Supporting paragraph 13.2.3 provides further sufficient detail regarding the potential need for flexibility in relation to the thresholds set out in Policy H9. The settlement hierarchy reflects the findings of the Sustainable Settlement Appraisal and is set out in Strategic Policy S2, this Gwehelog within the Tier 4 Minor Rural Settlements.	No change required.

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	Capacity Study: Main Villages and H4 settlements (June 2010).	While Policy H9 gives favourable consideration to 100% affordable exception sites in Tier 4 Minor Rural Settlements any proposals must meet the other criteria set out within Policy H9 and the rest of the RLDP policy framework as well as other detailed planning considerations. Any such proposals will be assessed on a site-by-site basis.	