

APPENDIX 3



Monmouthshire Replacement Local Development Plan 2018-2033

Report Of Consultation: Appendix 12
Deposit RLDP Representation Responses

Volume 17 – Monitoring & Review and Appendices

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Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1823 / Mr Michael Bosley / Objection	No reference to the monitoring the integrity of the River Usk SAC	National Resource Wales (NRW) is responsible for monitoring and managing the condition of the River Usk Special Area of Conservation (SAC), including compliance with relevant standards such as those relating to phosphates. As a statutory consultee, National Resource Wales (NRW) have been consulted throughout the Replacement Local Development Plan (RLDP) preparation process, as mandated by law.	No change required.

Appendices

Appendix 1: RLDP Supporting Documents

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
2779 / Mrs Kaely Backland / Objection	Objection to Sustainable Settlements Appraisal due to failure to evaluate Tier 4 settlements despite changes to policy H3 which will significantly increase development pressures in Minor Villages.	The Sustainability Settlement Appraisal (SSA) covers Tier 4 settlements, but unfortunately the PDF uploaded to the Council's website was corrupt, so these settlements did not show properly. This has now been rectified. The SSA, including the Tier 4 settlements were considered in formulating the settlement hierarchy set out in Policy S2.	No change required.

Appendix 4: Legislative and Policy Context

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1061 / Bannau Brycheiniog National Park (BBNP) / Objection	National Parks and Access to the Countryside Act 1949 should be referenced.	The list of legislation noted in Appendix 4 is not intended to be an exhaustive list, but key pieces of legislation within the context of development plan preparation. It is not, therefore, considered necessary to include the National Parks and Access to the Countryside Act 1949.	No change required.

Appendix 5: Regional Collaboration and Linkages with Neighbouring Local Authorities

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1061 / Bannau Brycheiniog National Park (BBNP) / Objection	Amend to 11 LPAs in South East Wales Planning Group (i.e. including the BBNP) rather than 10.	Comment noted. It is considered appropriate to amend the number of LPAs, as referred to within SEWSPG, from 10 to 11, as so to include the BBNP planning authority.	Change to read 11 LPAs as recommended.
1299 / Gloucestershire County Council / Comment	Note an update to Table 1 would be necessary to reference the timetable for plan-making at Gloucestershire County Council.	Table 1 'Status of LDPs within neighbouring Local Planning Authorities' was written at a point of time in October 2024 and reflects the status of local plan preparation at that time. In view of this and given that the table would need regular review/updating, the table will be deleted from Appendix 5.	Delete Table 1 'Status of LDPs within neighbouring Local Planning Authorities' of Appendix 5.

Appendix 6: RLDP Issues

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
3588 / Wye Valley National Landscape - Planning Officer - Miss Catherine Laidlaw / Support	Suggest reference to the setting should also be included for the National Landscape and World Heritage Site.	<p>In accordance with Welsh Government guidance set out in the Development Plans Manual (2020) the key issues, objectives and supporting evidence base for the plan provide the basis for the RLDP strategy, policies and allocations. The key issues and challenges therefore set the context while the policies and allocations provide the planning framework to help deliver the objectives.</p> <p>Policy LC2 relating to the Blaenavon Industrial Landscape World Heritage Site and Policy LC4 relating to the Wye Valley National Landscape (AONB) both refer to the setting of the individual designations. Any proposals within these locations will therefore be considered on a site-by-site basis.</p> <p>It is considered that this is sufficiently included in the policy framework which will be used to determine any planning applications, it is not therefore considered necessary to amend the wording as suggested.</p>	No change required.

Appendix 7: Housing Supply Components

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1356 / Welsh Government / Support	The Council has removed previous allocations which have stalled or not supported by sufficient evidence to demonstrate delivery. It is not appropriate to automatically consider they should be rolled forward. This is considered a prudent approach supported by the advice in DPM.	The Council has removed previous allocations which have stalled or not supported by sufficient evidence to demonstrate delivery. It is not appropriate to automatically consider they should be rolled forward. This is considered a prudent approach supported by the advice in DPM.	No change required.

Appendix 8: Infrastructure Delivery Plan

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1209 / Aneurin Bevan University Health Board / Comment	Engaging town planning colleagues to understand the impact of new housing developments and population shift is highlighted as a key action for 23/23 in the Monmouthshire South Neighbourhood Care Network Annual Plan and Monmouthshire Integrated Services Partnership Board IMTP 2023-26. Local concerns have been raised about Gray Hill Surgery in Caldicot (including Severnside area - Caerwent, Crick, Magor Undy, Portskewett, Rogiet and Sudbrook) as the only GP practice in the area which already has over 20,000 registered patients.	<p>The Council is committed to working with the Aneurin Bevan Health Board (ABUHB) in relation to the provision of necessary healthcare infrastructure. The Council will liaise further with the ABUHB throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.</p> <p>The IDP included in Appendix 8 identifies the key infrastructure needed, anticipated timescales of delivery and potential funding streams to support the delivery of allocated sites. The IDP sets out the key issues, constraints, policy and infrastructure requirements needed to deliver the Plans sites allocations. While the IDP only includes site specific information in relation to the allocated sites, an Infrastructure Plan Background has also been prepared as part of the RLDP Deposit Plan evidence base chapter 3 relates to existing infrastructure provision and capacity covering a range of topic areas including health infrastructure.</p> <p>While health infrastructure isn't listed specifically in the IDP for in relation to the site allocation at Land to the East of Caldicot/North of Portskewett (Policy HA2), ongoing discussions have taken place with Aneurin Bevan University Health Board (ABUHB) which have progressed further since the Deposit Plan consultation. While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in service improvement across the County as a whole. It is recognised that there is additional need in the South of the County in particular, and the Council is therefore working with ABUHB in identifying potential solutions and delivering a service on the Caldicot East North of Portskewett site.</p>	No change required.
1209 / Aneurin Bevan University Health Board / Comment	To help deliver the aims of the ABUHB Integrated Medium Term Plan 2022-25 suggest including principle of liaising with the Health Board at pre-application stage of major developments and including a requirement that the LPA engage with the Health Board during negotiations of S106 agreements regarding contributions towards healthcare infrastructure.	<p>The Council is committed to working with the Aneurin Bevan Health Board (ABUHB) in relation to the provision of necessary healthcare infrastructure. The Council will liaise further with the ABUHB throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.</p> <p>Further detail on planning obligations will be set out within supplementary planning guidance (SPG) associated with Strategic Policy S6. Appendix 11 identifies that a Planning Obligations SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1209 / Aneurin Bevan University Health Board / Comment	ABUHB Pharmaceutical Needs Assessment including evaluating community pharmacy provision against projected population growth figures in 2021, including looking at 5 strategic housing sites adopted in the LDP. Additional housing in the south of the county will put additional pressure on pharmacy services. Suggest a specific consideration of the impact of new developments on community pharmacy as set out in the Pharmaceutical Needs Assessment.	The Council is committed to working with the Aneurin Bevan Health Board (ABUHB) in relation to the provision of necessary healthcare infrastructure including pharmacy provision. The Council will liaise further with the ABUHB throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.	No change required.
1356 / Welsh Government / Support	An Infrastructure Delivery Plan Background Paper (October 2024) has been prepared in response to WG previous concerns on this matter an included within the plan Appendix 8. This is in line with the DPM, paragraphs 5.125 - 5.128.	Support welcomed.	No change required.
1677 / Councillor Frances Taylor / Objection	There are 770 homes proposed with no provision for GP surgery (or contribution towards the expansion of Grayhill surgery). The Background Paper states, 'The Council has engaged with ABUHB throughout the RLDP process and there have been no concerns raised about the current capacity of services within the area.' This does not appear to be the case, the ABUHB lead for Primary Care advised that there has been no engagement and indeed there are significant capacity issues. Magor surgery has been closed in the afternoons due to the capacity issues of Grayhill surgery. This	<p>The Council has engaged with Aneurin Bevan University Health Board (ABUHB) throughout the RLDP process and concerns were not raised by ABUHB until the Deposit Plan stage. The Council is nevertheless committed to working with the Aneurin Bevan Health Board (ABUHB) in relation to the provision of necessary healthcare infrastructure. The Council will liaise further with the ABUHB throughout the remainder of the RLDP process and beyond at the planning application stage of allocated sites.</p> <p>While health infrastructure isn't listed specifically in the IDP for in relation to the site allocation at Land to the East of Caldicot/North of Portskewett (Policy HA2), on-going discussions have taken place with Aneurin Bevan University Health Board (ABUHB) which have progressed further since the Deposit Plan consultation. While the mechanisms for improved health infrastructure sit outside of the planning process, the Council is fully engaged with the health board in service improvement across the County as a whole. It is recognised that there is additional need in the South of the County in particular, and the Council is therefore working with ABUHB</p>	No change required.

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	is inconsistent with the objectives of the RLDP.	in identifying potential solutions and delivering a service on the Caldicot East North of Portskewett site.	
3562 / Gateway to Wales Action Group / Objection	State the Infrastructure Plan included in the Deposit Plan is much smaller than the one included in the LDP previously. Suggest this means infrastructure issues will be left to the last minute when planning applications are considered. Suggest the Plan needs to be adjusted to address this concern.	<p>In conformity with Welsh Government guidance set out in the Development Plans Manual Wales (2020) any new or improved infrastructure necessary to support allocations should be identified within the RLDP and the Infrastructure Delivery Plan. Accordingly, both the site-specific allocations and the Infrastructure Delivery Plan (IDP) included in Appendix 8 set out any necessary infrastructure requirements. In addition to the IDP set out in Appendix 8 an IDP Background Paper has been prepared as part of the RLDP Deposit Plan Evidence Base, relates to existing infrastructure provision and capacity covering a range of topic areas.</p> <p>Welsh Government support this approach in their representation on the Deposit RLDP noting the inclusion of the Infrastructure Delivery Plan Background Paper is in line with paragraphs 5.125 – 5.128 of the Development Plans Manual Wales (2020).</p> <p>The Infrastructure Delivery Background Paper was available on the Council's website for the entirety of the RLDP Deposit consultation and remains available to view.</p>	No change required.
3562 / Gateway to Wales Action Group / Objection	Refer to the Dixon Road sewers and a privately obtained letter sent from DCWW to the Representor which notes a Hydraulic Modelling Assessment would be required to determine capacity at the expensive of the site promoter. Suggest this will be expensive, disruptive on traffic and will hit the developers profit margin.	<p>The IDP includes reference to Water Supply/Sewerage including the need for a Hydraulic Modelling Assessment (HMA) for the HA4 site (page 301 of the RLDP Deposit Plan) and within the same table in the IDP Background Paper (page 42).</p> <p>In addition to this chapter 3 of the IDP Background Paper has a section on Water Supply/Sewerage with specific reference to HMA in paragraph 3.50. It is noted that HMA's are usually undertaken before the statutory pre-application service but are not expected in advance of allocations being made in the Deposit RLDP. The HMA will give a recommended solution for any network reinforcements and if any works are required these would be developer funded via the requisition provisions of the Water Industry Act 1991.</p> <p>This is not unusual and is considered a standard approach for major development schemes of this size, developers therefore allow for costs of this type of assessment as part of developments.</p> <p>Site promoters of the proposed site allocations have completed site specific financial viability assessments (FVA) to support their proposals which demonstrate</p>	No change required.

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		that sites are viable based on 50% affordable housing requirements, net zero carbon homes and other key requirements set out within the site allocation policies, without subsidy. The allocated sites are concluded to be viable based on the multitude of infrastructure requirements included in the IDP.	
1663 / Richborough / Comment	With reference to HA2 in the key site issues and constraints column note relating to no built development to take place in the areas of the Caldicot Castle SAM, Country Park, Conservation Area and AAI. Suggest clarification is provided to state whilst no new housing is proposed in these areas it is likely that attenuation features and active travel links will be accommodated in the Conservation Area and AAI. Also refer to Crick Road being incorporated as an active street frontage, note while this is a key part of the masterplan process there may be instances where it is not appropriate or feasible.	The issues and constraints included in Appendix 8 relate directly to the relevant site allocation policy wording. Representations received on HA2 are fully considered in the relevant section of the report.	No change required.
1663 / Richborough / Objection	With reference to HA2 in the key infrastructure requirements noting where active travel routes are listed the delivery body is noted as the developer. State it should be noted that active travel routes could be delivered by the developer, or by means of financial contributions with the ultimate delivery by the Council.	Active travel routes within the site should be provided as part of the development and therefore the delivery body would be the developer for the site itself. It is recognised that for any routes outside of the site boundary it may be that the Council delivers the routes following financial contributions as noted. The wording will therefore be amended in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper to read Developer/Monmouthshire County Council.	Amend wording in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper to replace 'Developer' with 'Developer/Monmouthshire County Council' under delivery body for any active travel route requirements across all of the allocated sites.

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1663 / Richborough / Objection	With reference to HA2 in the key infrastructure requirements noting under highways and sustainable travel speed limit revisions to Crick Road are included, while the intention is supported note this falls outside of planning and if it is retained for context recommend the delivery body column is changed to list the Council.	It is recognised that while such measures can be put in place by developers as part of any development of the site, implementation of traffic regulation orders, speed limits and enforcement sit outside the scope of the RLDP. The wording will therefore be amended in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper to read Developer/Monmouthshire County Council.	Amend wording in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper to replace 'Developer' with 'Developer/Monmouthshire County Council' under delivery body for any highways and sustainable travel requirements across the allocated sites.
1663 / Richborough / Objection	With reference to HA2 under nature recovery it is noted that net benefit for biodiversity will be provided as part of the masterplanning recommend the delivery body is changed to Developer/Monmouthshire County Council.	The developer is responsible for any net benefit for biodiversity measures as part of the development of the site, this would not be delivered by the Council. It is not, therefore, considered appropriate to amend the wording of the policy as suggested.	No change required.
1663 / Richborough / Objection	With reference to HA10 site description refers to the site benefitting from less than 15 minute walking time to Raglan's centre. Request this be amended to reflect the wording in the main body of the Deposit Plan which reflects it is actually less than 10 minutes' walk to Raglan's centre.	The site description as noted does not reflect that of the wording included in Policy HA10 Land south of Monmouth Road, Raglan site. The wording will therefore be amended in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper to read 10 minutes.	Amend the site description wording in Appendix 8 and the Infrastructure Delivery Plan (IDP) Background Paper for the HA10 Land south of Monmouth Road, Raglan site: Delete '15' and replace with '10'.

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1663 / Richborough / Objection	With reference to HA10 site under highways and sustainable travel heading an emergency access road is listed as a requirement. As it stands the TA does not identify a need for an emergency access. Furthermore, it also refers to off-site highways infrastructure contributions, the TA does not identify a need for any off-site infrastructure works to the local/strategic highway network.	The issues and constraints included in Appendix 8 relate directly to the relevant site allocation policy wording. Representations received on HA10 are fully considered in the relevant section of the report.	No change required.
1663 / Richborough / Objection	With reference to HA10 site under nature recovery it is noted that net benefit for biodiversity will be provided as part of the masterplanning, recommend the delivery body be changed to developer/Monmouthshire County Council.	The developer is responsible for any net benefit for biodiversity measures as part of the development of the site, this would not be delivered by the Council. It is not, therefore, considered appropriate to amend the wording of the policy as suggested.	No change required.
2739 / Janine Amos / Objection	HA11 - Nature Recovery. Specifics need to be stated. The financial contributions, accountability, mentions of 'commuted sums', use of TBC (15 times) and other vague aspirations are very concerning.	Bat and Bird boxes are considered to provide net biodiversity benefit and are costed within the Green Infrastructure row at a current cost of £100 per home. Other net biodiversity measures will be included as part of any future application on the site and will be agreed with the Council's ecologists, secured by planning condition and likely through the use of S.106 agreements. The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements, costs etc at this stage of the planning process. Further details will be determined as the site progresses to the planning application stage, as necessary. The estimated costs within the IDP will be updated further where relevant in the RLDP process, when additional information relating to key elements of infrastructure is known. The IDP Background Paper provides more detail on existing infrastructure provision and capacity covering a range of topic areas. Further detail on Planning Obligations will be set out within supplementary planning guidance (SPG) associated with Strategic Policy S6. Appendix 11 identifies that a Planning Obligations SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.	No change required.

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2914 / Michael Hardy / Objection	<p>Re HA11 Green Infrastructure and also Nature Recovery 'TBC' appears multiple times so how can we possibly comment on something so vague? Bird/bat boxes will just be removed by homeowners; swift bricks would be better and that HA11 provides a wildlife corridor between the Olway Brook SINC and Cockshoot wood ASNW SINC. Objector feels reference to be provided on site as far as possible in Appendix 8 contradicts statement in S8 referring to taking a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience.</p>	<p>Bat and Bird boxes are considered to provide net biodiversity benefit and are costed within the Green Infrastructure row at a current cost of £100 per home. Other net biodiversity measures will be included as part of any future application on the site and will be agreed with the Council's ecologists, secured by planning condition and likely through the use of S.106 agreements.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements, costs etc at this stage of the planning process. Further details will be determined as the site progresses to the planning application stage, as necessary. The estimated costs within the IDP will be updated further where relevant in the RLDP process, when additional information relating to key elements of infrastructure is known. The IDP Background Paper provides more detail on existing infrastructure provision and capacity covering a range of topic areas.</p> <p>Further detail on Planning Obligations will be set out within supplementary planning guidance (SPG) associated with Strategic Policy S6. Appendix 11 identifies that a Planning Obligations SPG will be prepared to support the RLDP within 12 months of adoption of the Plan.</p>	No change required.

Appendix 9: Housing Trajectory

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1356 / Welsh Government / Support	The Council has now set out a housing trajectory (Appendix 9) identifying the phasing and timing of sites, linked to any infrastructure required to deliver the housing requirement in line with Tables 16, 17, 19, 20, 21 and Diagram 16 in the DPM.	Support welcomed.	No change required.
1281 / Barratt David Wilson Homes / Objection	Trajectory - Question whether it is accurate with only 7 years left of the plan period from adopted. BDWH reference Lichfield's evidence which indicated large scale housing sites is often greater than anticipated. Concerns therefore over the timescales for the delivery of Land east of Abergavenny and Land east of Caldicot/North of Portskewett particularly as both sites are under fragments ownership and neither site is being promoted by housebuilders. BDWH's position is that the number of homes assumed to be delivered across these two sites in the RLDP plan period is too great and that the spatial strategy needs to be amended to reflect this with the reduction in the number of homes assumed to come forward from these sites met elsewhere.	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory for HA1 – Land to the East of Abergavenny, Monmouthshire Housing Association has expressed their support for the proposed housing trajectory. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes</p>	Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates: 130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.

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		<p>to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	

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1301 / Melin Homes / Objection	<p>Welcome the approach taken in the Housing Trajectory. Caldicot East: Note Richborough Estates comments in the housing background paper, however, comment that an EIA is likely to take up to 6 months, then a PAC undertaken. Will take around 12 months to determine an outline application and then further 6 months to agree the S106. Will then need to be a disposal process to a developer. Anticipate this could take up to a year. Given the scale of the site, likely to be significant upfront infrastructure requirements. Therefore, optimistically first completions would be during 2030/31 monitoring year. At least 320 dwellings will be delivered in the next period.</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	<p>Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates: 130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.</p>
1301 / Melin Homes / Objection	<p>Abergavenny East: EIA is likely to take up to 6 months to prepare alongside pre-app process. Then PAC undertaken. Planning application unlikely to be submitted until later 2026. Likely to take 12 months to determine an outline planning application,</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020)</p>	<p>No change required.</p>

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	<p>then further 6 months to agree a S106 agreement. Reserved matters for early phases would not be submitted until early 2029. Given the scale of the development significant infrastructure requirements, optimistically first completions expected 2030/21, with 80 per annum. At least 190 homes will be delivered in the next period.</p>	<p>front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p>	
1305 / MHA / Objection	Trajectory - welcome the approach taken towards the trajectory by the Council in	In response to the Deposit Plan consultation, Dwr Cymru Welsh Water advised that they intend to deliver a phosphorus mitigation scheme at the Devauden	Update the Housing Trajectory in relation to

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	general and confirm that land at Devauden can be made available earlier in the plan period subject to the completion of WWTW upgrades.	Wastewater Treatment Works (WwTW) by January 2027 and accordingly advise that capacity will be available at the WwTW to accommodate foul water flows from the proposed allocation upon completion of a scheme at the WwTW. It is therefore proposed to amend the housing trajectory in relation to HA14 – Land at Churchfields, Devauden with the delivery of 10 units anticipated in 2028/29 and 10 units in 2029/30.	HA14 – Land at Churchfields, Devauden with the delivery of 10 units in 2028/29 and 10 units in 2029/30.
1493 / Vistry Homes Limited / Objection	Strategy is reliant upon two strategic housing sites - Abergavenny East (HA1) and Land East of Caldicot (HA2) which is likely to result in the under delivery of housing. For both sites it is assumed that time between submission of planning application to determination will be just 12 months and commencement on site in just 6 months from planning consent. These timescales are over optimistic and entirely unrealistic. Delivery against the housing trajectory is fundamental to the soundness of the Plan. Additional sites are required.	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocations to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory for HA1 – Land to the East of Abergavenny, Monmouthshire Housing Association has expressed their support for the proposed housing trajectory. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p>	<p>Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates:</p> <p>130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	
1503 / Redrow Homes (South Wales) Limited / Support	Endorse the housing trajectory for HA4. Note Redrow Homes (South Wales) Ltd are in the process of preparing a planning application which will ensure the delivery	Support welcomed.	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	of the site can be progressed quickly once the RLDP is adopted.		
1663 / Richborough / Support	Support the timings and phasing set out in Table 1 in relation to HA2 and HA10. The developer has frontloaded the process with supporting documentation and technical reports for HA2. Will continue to engage with the housing trajectory stakeholder group to provide further information in support of the assumptions made as required.	Support welcomed. The ongoing dialogue between the Council and the site promoters has resulted in an amendment to the trajectory to reflect concerns raised in relation to the lead in time to first completions. These are now scheduled for 2028/29. The updated trajectory, however, reaffirms that the 770 homes can be delivered within the Plan period.	Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates: 130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.
1683 / Llanarth Estates / Objection	Welcome the approach taken in the Housing Trajectory. Caldicot East: Note Richborough Estates comments in the housing background paper, however, comment that an EIA is likely to take up to 6 months, then a PAC undertaken. Will take around 12 months to determine an outline application and then further 6 months to agree the S106. Will then need to be a disposal process to a developer. Anticipate this could take up to a year. Given the scale of the site, likely to be significant upfront infrastructure requirements. Therefore, optimistically first completions would be during 2030/31 monitoring year. At least 320 dwellings will be delivered in the next period.	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring</p>	Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates: 130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	
1683 / Llanarth Estates / Objection	<p>Abergavenny East: EIA is likely to take up to 6 months to prepare alongside pre-app process. Then PAC undertaken. Planning application unlikely to be submitted until later 2026. Likely to take 12 months to determine an outline planning application, then further 6 months to agree a S106 agreement. Reserved matters for early phases would not be submitted until early 2029. Given the scale of the development significant infrastructure requirements, optimistically first completions expected 2030/21, with 80 per annum. At least 190 homes will be delivered in the next period.</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing</p>	No change required.

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
		<p>developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p>	
1965 / Monmouthshire Housing Association (MHA) / Support	MHA express support for the proposed housing trajectory for the HA1 site. As set out in the trajectory the site can and will deliver the full housing allocation (500 units) within the Plan period. A lead-in time of 4 years has been built into the trajectory as opposed to 2-3 years, which will allow sufficient time to obtain the relevant Outline and Reserved Matters applications to be submitted and approved. Evidence has been provided appropriate viability and other assessment work to demonstrate deliverability. Site promoter is actively seeking to enter into formal pre-application dialogue with the Council in early 2025.	Support welcomed.	No change required.
2951 / Tirion Homes / Objection	Welcome the approach taken in the Housing Trajectory. Caldicot East: Note Richborough Estates comments in the housing background paper, however,	A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.	Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>comment that an EIA is likely to take up to 6 months, then a PAC undertaken. Will take around 12 months to determine an outline application and then further 6 months to agree the S106. Will then need to be a disposal process to a developer. Anticipate this could take up to a year. Given the scale of the site, likely to be significant upfront infrastructure requirements. Therefore, optimistically first completions would be during 2030/31 monitoring year. At least 320 dwellings will be delivered in the next period.</p>	<p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	<p>Portskewett with following delivery rates:</p> <p>130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.</p>
2951 / Tirion Homes / Objection	<p>Abergavenny East: EIA is likely to take up to 6 months to prepare alongside pre-app process. Then PAC undertaken. Planning application unlikely to be submitted until later 2026. Likely to take 12 months to determine an outline planning application, then further 6 months to agree a S106 agreement. Reserved matters for early phases would not be submitted until early</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>2029. Given the scale of the development significant infrastructure requirements, optimistically first completions expected 2030/21, with 80 per annum. At least 190 homes will be delivered in the next period.</p>	<p>In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p>	
2952 / Candleston Homes / Objection	<p>Welcome the approach taken in the Housing Trajectory. Caldicot East: Note Richborough Estates comments in the housing background paper, however, comment that an EIA is likely to take up to 6 months, then a PAC undertaken. Will take</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020)</p>	<p>Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>around 12 months to determine an outline application and then further 6 months to agree the S106. Will then need to be a disposal process to a developer. Anticipate this could take up to a year. Given the scale of the site, likely to be significant upfront infrastructure requirements. Therefore, optimistically first completions would be during 2030/31 monitoring year. At least 320 dwellings will be delivered in the next period.</p>	<p>front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	<p>Portskewett with following delivery rates:</p> <p>130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.</p>
2952 / Candleston Homes / Objection	<p>Abergavenny East: EIA is likely to take up to 6 months to prepare alongside pre-app process. Then PAC undertaken. Planning application unlikely to be submitted until later 2026. Likely to take 12 months to determine an outline planning application, then further 6 months to agree a S106 agreement. Reserved matters for early phases would not be submitted until early 2029. Given the scale of the development significant infrastructure requirements,</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>optimistically first completions expected 2030/21, with 80 per annum. At least 190 homes will be delivered in the next period.</p>	<p>proposed housing trajectory in relation to the HA1 site allocation. The trajectory demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p>	
2954 / Sero / Objection	<p>Welcome the approach taken in the Housing Trajectory. Caldicot East: Note Richborough Estates comments in the housing background paper, however, comment that an EIA is likely to take up to 6 months, then a PAC undertaken. Will take around 12 months to determine an outline application and then further 6 months to</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in</p>	<p>Update the Housing Trajectory in relation to HA2 – Land to the East of Caldicot / North of Portskewett with following delivery rates:</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>agree the S106. Will then need to be a disposal process to a developer. Anticipate this could take up to a year. Given the scale of the site, likely to be significant upfront infrastructure requirements. Therefore, optimistically first completions would be during 2030/31 monitoring year. At least 320 dwellings will be delivered in the next period.</p>	<p>relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>With regards to HA2 – Land to the East of Caldicot / North of Portskewett, following ongoing dialogue with the site promoters and reflecting concerns raised in relation to the lead in time to first completions, it is proposed to update timescales, with the first completions moved to 2028/29. The updated trajectory, however, reaffirms that 770 homes can be delivered within the Plan period. The site promoters intend to submit separate outline planning applications which will both be progressed towards examination. Sufficient time is built into the process for detailed planning stages, sale of both parcels of land and commencement of development with first deliveries anticipated within the 2028/29 monitoring period. The site allocation is not subject to any significant infrastructure requirements that impact on delivery times or, phasing of development of the site.</p> <p>It is envisaged that the allocation will be built out with at least three outlets across the site, two of which will relate to the market homes. 50% of the homes will be affordable and it is therefore expected that these homes would be delivered by or on behalf of a Registered Social Landlord, which will effectively operate as a separate outlet to the market homes.</p> <p>Given the likelihood of multiple outlets across the site, the build rates have been increased marginally, with 130 homes in 2028/29, 135 homes per annum in 2029/30, 2030/31, 2031/32 and 2032/33 with a further 100 in 2033 +9 months.</p>	<p>130 homes in 2028/29; 135 homes per annum in 2029/30, 2030/31, 2031/21 and 2032/33, and 100 in 2033 +9 months.</p>
2954 / Sero / Objection	<p>Abergavenny East: EIA is likely to take up to 6 months to prepare alongside pre-app process. Then PAC undertaken. Planning application unlikely to be submitted until later 2026. Likely to take 12 months to determine an outline planning application, then further 6 months to agree a S106 agreement. Reserved matters for early phases would not be submitted until early 2029. Given the scale of the development significant infrastructure requirements, optimistically first completions expected</p>	<p>A housing trajectory has been prepared as part of the Deposit Plan and updated to reflect the 2024/25 housing monitoring period. This demonstrates housing delivery rates throughout the Plan period can be achieved.</p> <p>Considerable dialogue and engagement have already taken place with the site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle, a significant level of evidence base has been submitted in relation to the proposed site allocation to reduce the risk of a slower delivery rate than anticipated.</p> <p>In terms of the delivery rates set out in the Housing Trajectory (Appendix 9 of the RLDP), Monmouthshire Housing Association has expressed their support for the proposed housing trajectory in relation to the HA1 site allocation. The trajectory</p>	<p>No change required.</p>

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
	<p>2030/21, with 80 per annum. At least 190 homes will be delivered in the next period.</p>	<p>demonstrates the anticipated timescales and build rates that will deliver 500 homes within the Plan period. A lead-in time of 4 years has been built into the trajectory for the site (from the Deposit stage), reflecting the significant site preparation work that has been prepared to support the candidate site process, and which will allow for sufficient time to obtain the relevant Outline and Reserved Matters permissions. As part of the ongoing discussions that have been held in relation to the allocation, the site promoter has entered into formal pre-application dialogue with the Council to continue the site's progression. Following this, in order to secure full permission for the site to enable its development at the earliest opportunity, the site promoter will be seeking to make an outline planning application to continue the site's progression. Monmouthshire Housing Association is a registered social landlord, with a history of delivering affordable housing developments, which will be beneficial to the delivery of this strategic site and the number of affordable homes to be delivered and managed in accordance with the 50% affordable housing requirement.</p> <p>In terms of the annual completions, this has been estimated at circa 90 units per annum, with 70 units in the first year and final years. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan Period. It is important to note that the site will deliver 50% affordable homes and 50% open market homes. If the principle of two open market outlets operating at one time plus the affordable homes provision on top is applied, the speed at which the site will be delivered could potentially be quicker than that outlined in the trajectory. Monmouthshire County Council is the first council to require this level of affordable housing provision so it is quite unique in terms of the delivery trends that could apply.</p>	

Appendix 10: Employment Land Schedule

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1506 / Morspan Pension Scheme / Support	Confirm the EA1b site can be delivered in the medium term (between 2023/24 and 2027/28) as identified on the employment land trajectory.	Support welcomed.	No change required.

Appendix 11: Supplementary Planning Guidance Schedule

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1209 / Aneurin Bevan University Health Board / Comment	Would like to see a rapid participatory health impact assessment approach to SPG. This would include engaging with a range of stakeholders including population group representatives to assess the potential positive and negative impacts of relevant SPGs on health determinants and health inequalities.	Appendix 11 identifies supplementary planning guidance (SPG) that will be prepared to support the RLDP, noting those that will be prepared within a 12 month period of adoption. The list is not exhaustive. Any SPG will be subject to public consultation prior to their adoption and stakeholders will therefore be able to provide comments on each SPG.	No change required.
1367 / Abergavenny and District Civic Society / Objection	Request a commitment to adopt SPG on Horticultural Rural Enterprise Dwellings. There is no reference to the type of smallholding with a dwelling described in H1.	Appendix 11 identifies supplementary planning guidance (SPG) that will be prepared to support the RLDP, noting those that will be prepared within a 12 month period of adoption. The list is not exhaustive, the need for this type of SPG will be considered in future should it be required.	No change required.
1376 / Abergavenny Transition Town / Objection	Request a commitment to adopt SPG on Horticultural Rural Enterprise Dwellings. There is no reference to the type of smallholding with a dwelling described in H1. Note that WG is grant funding a pilot in Powys to divide up one of their County Farm into small holdings with accompanying dwellings.	Appendix 11 identifies supplementary planning guidance (SPG) that will be prepared to support the RLDP, noting those that will be prepared within a 12 month period of adoption. The list is not exhaustive, the need for this type of SPG will be considered in future should it be required.	No change required.
2299 / Mr Maurice Barnes / Objection	Wish to support Abergavenny Civic Society comments highlighting the need for policy/SPG that responds to changes in farming and horticulture that are increasing the demand for small holdings accompanied by new dwellings.	Appendix 11 identifies supplementary planning guidance (SPG) that will be prepared to support the RLDP, noting those that will be prepared within a 12 month period of adoption. The list is not exhaustive, the need for this type of SPG will be considered in future should it be required.	No change required.

Appendix 12: Glossary of terms

Rep. No. / Name / Support, Objection or Comment	Representation Summary	Council Response	Council Recommendation
1239 / The Canal & River Trust (Glandwr Cymru) / Support	Glandwr Cymru promote our canals as multi-functional Green Infrastructure assets, and we note that canals are specifically recognised as GI in the glossary and in para 10.2.1.	Support welcomed.	No change required.