

Monmouthshire Replacement Local Development Plan

Housing Background Paper

December 2022



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Replacement Local Development Plan**

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Executive Summary

- i. The Replacement Local Development Plan (RLDP) is the statutory land use plan to support delivery of the Council’s core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life¹. The RLDP will deliver the Council’s objectives and address the core issues of delivering essential affordable homes, responding to the climate and nature emergency by delivering net zero carbon ready new homes in exemplar places, and ensuring our communities are socially and economically sustainable. The RLDP plays a key strategic role in the delivery of development and it must ensure sufficient land is made available to meet future anticipated population and employment growth in the County over the Plan period. The delivery of a suitable supply of housing is central to addressing some of the key issues/challenges that Monmouthshire is facing.
- ii. The purpose of this Background Paper is to identify the amount of land the Council will be required to allocate for housing in the RLDP in order to meet the proposed level of growth. The proposed housing requirement as set out in the Preferred Strategy² is for 5,400 homes to be built in the County between 2018–2033. A flexibility allowance over and above this estimate of need will be included to account for the possibility that some sites may not come forward as expected during the Plan period. The flexibility allowance is initially set at 10% but will be subject to refinement as more detailed site viability and deliverability work is undertaken and the housing trajectory further developed. With the inclusion of a 10% flexibility allowance the Plan will make provision for 5,940 homes to deliver a housing requirement of 5,400 homes: this equates to 360 homes per annum up to 2033, excluding the flexibility allowance.
- iii. This Background Paper considers the current possible housing land supply in the County and then provides details of how far each strand of this housing land supply can contribute towards meeting the identified housing provision including a flexibility allowance. The residual balance represents that element of the housing provision that will need to be met by identifying new housing land allocations in the RLDP. The Paper also considers the spatial distribution of this growth.
- iv. A summary of the RLDP housing provision and how this will be met is set out below.

Element		Number of Homes	Notes
Housing Provision		5,940	RLDP Preferred Strategy 2018-2033 Housing requirement = 5,400 + 10% flexibility allowance, to be considered further in the Deposit Plan
Less Commitments:			
2018-22 Completions	Dwelling	1,579	Comprises 1,265 homes on large sites and 314 homes on small sites

¹ The draft Community and Corporate Plan 2022 sets out the Council’s core purpose, principles, and priorities. It was endorsed by Cabinet on 19th October 2022 and a developed version will be reported to Council in January 2023.

² The RLDP Preferred Strategy is available to view via <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/preferred-strategy/>

Element	Number of Homes	Notes
Existing Land Supply Commitments	1,261	Sites have only been included if construction is already underway or they have planning permission or have planning permission subject to the signing of a S106 agreement as at 01/04/22, and they are expected to come forward over the Plan period. Three sites have been discounted from this element of supply due to non-delivery. ³
Less Allocations:		
LDP 'Rollover Allocations'	0	Rollover Allocations are Adopted LDP large site allocations which do not currently benefit from a planning permission. There are three sites which meet this definition, two of these sites, SAH4 Wonastow Road, Monmouth and SAH8 Tudor Road, Wyesham cannot proceed due to phosphate issues and do not align with the new Spatial Strategy, being located in the upper River Wye catchment. The remainder of the final site, SAH6 Land at Vinegar Hill, Undy, which does not currently have planning permission is not proposed to be brought forward by the landowner.
Revised Provision	3,100	
Less Allowances:		
Windfall Allowance (>10 homes)	210	The windfall allowance is based on the number of homes estimated to be achievable on sites included within the Housing Potential Study. This excludes any settlements within the upper River Wye catchment area. An allowance of 210 homes (35 homes per annum) is included for the last 6 years of the Plan period (2027 – 2033). Windfalls for the first 4 years of the plan period (2018-2022) are included

³ Two of the sites, Mulberry House Abergavenny and Osborne International, Chepstow have been in the land bank for many years and whilst the sites have started, progress has been very slow/or stalled. The third site, Rockfield Road Monmouth has a current outline planning permission but is unable to proceed due to the phosphate issue in the upper River Wye catchment area where the site is located.

Element	Number of Homes	Notes
		within the completions. Windfall sites with current permission are included within the existing commitments. To avoid double counting the first 5 years of the remaining Plan period are excluded from the calculation (2022 – 2027).
Small Site Allowance (<10 homes)	690	<p>If the small site allowance is calculated on the basis of the remaining 11 years of the Plan period (2022-2033), an allowance of 902 homes (82 homes per annum) would need to be included based on an average of small site completions over the past 10 years (2012-2022).</p> <p>Due to the impact of phosphates on the ability of small sites to come forward in settlements in the upper River Wye catchment, if these settlements are excluded from the future extrapolation rate this results in a small site allowance of 720 homes (65 homes per annum).</p> <p>Following an appraisal of small site opportunities, the allowance for sites of less than 5 homes in rural settlements has been discounted by 20%.⁴ This results in a small site allowance of 690 homes (63 homes per annum)</p>
Total New Allocations Provision	2,200	

⁴ Officers have undertaken an assessment of the possible small site opportunities within the existing development boundaries of the main rural settlements, this has identified that there is limited scope for small site development within our existing rural settlements with many of the development opportunities already taken.

1. Introduction

- 1.1 The Replacement Local Development Plan (RLDP) is the statutory land use plan to support delivery of the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life⁵. The RLDP will deliver the Council's objectives and address the core issues of delivering essential affordable homes, responding to the climate and nature emergency by delivering net zero carbon ready new homes in exemplar places, and ensuring our communities are socially and economically sustainable by attracting and retaining younger people to rebalance our ageing demographic and to ensure that the County has a sufficient working age population to support the economy. The delivery of a suitable supply of housing is central to addressing these core issues. The Plan plays a key strategic role in the delivery of development and it must ensure sufficient land is made available to meet future anticipated population and employment growth in the County over the Plan period.

Purpose of this Background Paper

- 1.2 The purpose of this Background Paper is to identify the amount of land the Council will be required to allocate for housing in the RLDP in order to meet the proposed level of growth and to put forward a clear spatial strategy for where in the County this growth should be located. A number of alternative growth and spatial options for the RLDP have been considered and assessed in the preparation of the RLDP Preferred Strategy.
- 1.3 The housing requirement is for 5,400 homes to be built in the County between 2018–2033. In accordance with the Development Plans Manual (WG, March 2020) a flexibility allowance over and above this estimate of need will be included to account for the possibility that some sites may not come forward as expected during the Plan period. The flexibility allowance is initially set at 10% but will be subject to refinement as more detailed site viability and deliverability work is undertaken and the housing trajectory further developed. With the inclusion of a 10% flexibility allowance the Plan will make provision for 5,940 homes to deliver a dwelling requirement of 5,400 homes: this equates to 360 homes per annum up to 2033, excluding the flexibility allowance.
- 1.4 It is worth noting that the current Adopted LDP had a housing requirement of 4,500 homes between 2011-2021 and allocated sufficient land for 4,950 homes (10% flexibility). However, the 2021/22 Annual Monitoring Report shows that only 3,000 homes have been delivered within the Plan period. All allocated sites have planning permission and are coming forward beyond the Plan period with the exception of a small number of sites that are unable to proceed due to the phosphates issue, most notably Drewen Farm, Monmouth and Tudor Road, Wyesham. For the RLDP, in addition to the flexibility allowance, careful consideration will be required of ways to ensure allocated sites come forward promptly.

⁵ The draft Community and Corporate Plan 2022 sets out the Council's core purpose, principles, and priorities. It was endorsed by Cabinet on 19th October 2022 and a developed version will be reported to Council in January 2023.

2. RLDP Growth Strategy

- 2.1 Table 1 below shows the total dwelling requirement for the RLDP Preferred Strategy of 5,400 homes over the 15 year Plan period 2018-2033. This equates to 360 homes per annum which is deliverable based on past trends.

Table 1: RLDP Preferred Strategy Housing Requirement

	RLDP Growth Strategy Dwelling Requirement 2018-2033
Total Dwelling Requirement	5,400
Annual Dwelling Requirement	360

Monmouthshire RLDP Preferred Strategy Dwelling Requirement: How has the Dwelling Requirement been Determined?

- 2.2 The RLDP Preferred Strategy promotes and supports a level of housing and employment growth up to 2033 that will be focussed on the primary settlements of Abergavenny, Caldicot and Chepstow along with a sustainable amount of growth in the secondary and rural settlements to deliver much needed affordable housing. The Strategy assists in addressing the demographic and affordability challenges facing the County and ultimately seeks to deliver the Council's core purpose of becoming a zero-carbon county, supporting well-being, health and dignity for everyone at every stage of life. The proposed level of growth will address the key issues and objectives that we are seeking to address in the RLDP, specifically issues 2, 3, 4 and 5 relating to employment and economy, issues 24, 25, 26, and 27 relating to population and housing⁶ and objectives 1 (economic growth/employment), 9 (demography) and 10 (housing). A full description of the issues and objectives for the RLDP can be found in the RLDP Preferred Strategy.⁷
- 2.3 Following consultation and engagement on the previous Preferred Strategy in Summer 2021, a number of challenges have arisen which have impacted on the progression of the RLDP and required further consideration, namely a Welsh Government objection to the level of growth in the Preferred Strategy and phosphate water quality issues in the Rivers Wye and Usk. In response to the Welsh Government objection, Edge Analytics updated the growth options modelling to incorporate the latest 2020 mid-year population estimates and housing completion data in the County up to 2021⁸. A number of scenarios were generated, including the August 2021 Welsh Government prescribed level of growth. The outputs from the updated modelling were assessed and considered and in September 2022 Council endorsed⁹ the proposal to proceed

⁶ The Issues, Vision and Objectives Paper (Updated December 2022) is available to view via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

⁷ The RLDP Preferred Strategy is available to view via <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/preferred-strategy/>

⁸ Monmouthshire Updating the RLDP Demographic Evidence (November 2021) is available to view via: <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

⁹ <https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=143&MId=5010>

with a new growth and spatial strategy that responds to these challenges and maximises delivery of these core issues and objectives within the environmental and national policy constraints.

- 2.4 The rationale and assumptions associated with the Preferred Growth Strategy are soundly based and establish a level of growth that seeks to address the key issues relating to the reducing working age population and levels of out commuting in the County and will enable people to live and work in the County by making provision for a supply of good quality market and affordable homes for those who need them. The impact of the phosphate water quality issue in the Rivers Wye and Usk on the spatial distribution of growth is discussed in section 9 of this background paper.
- 2.5 The underlying assumptions behind the dwelling requirement for the RLDP Preferred Strategy are explained further below.

RLDP Preferred Growth Strategy – Underlying Assumptions

- 2.6 The RLDP Preferred Strategy is based on a demographic-led scenario with added underlying assumptions to address the County’s key issues and objectives. The modelling has been undertaken on a Local Planning Authority level rather than at the Unitary Authority level and thus excludes that area of the County administered by the Brecon Beacons National Park. As a demographic-led scenario, the 2018-based Welsh Government (WG) population and household projection variants form the starting point of the modelling. The ONS 2020 MYE is used as the base year, with area-specific fertility and mortality assumptions derived from the WG 2018-based Principal projection. Internal in-migration rates are adjusted to reflect higher in-migration (based on the last 5-years) from Bristol and South Gloucestershire, following the removal of the Severn Bridge tolls. All other migration assumptions are derived from a 19-year historical period (2001/02–2019/20). At the time of the modelling detailed age specific outputs from the 2021 Census were not available to enable any further update to the modelling. Whilst the ONS have since published some demographic and household data from the census there is still key information unavailable which would need to be fed into the modelling, with the WG 2021-based projections not due for publication until 2023 at the earliest. The data above has therefore been used as the starting point, sensitivity testing has then been undertaken to address the key issues that Monmouthshire faces.
- 2.7 To address the County’s unbalanced demographic, one of the key RLDP objectives, adjustments have been made to the household membership rates for three key younger age groups (19-24, 25-29, 30-34). This adjustment ‘returns’ the household membership rate for these three age groups, for both males and females, to their 2001 levels by 2027 and then continues on trend until the end of the plan period. This results in subtle changes to the membership rates, gradually increasing the volume of households associated with these young adult age-groups. This approach will help retain younger adult age groups and rebalance Monmouthshire’s ageing demographic (RLDP Objectives 9, 10, 11, 12 and 13).

- 2.8 To address out-commuting, another key objective of the Plan, the Preferred Strategy assumes a reduction in out-commuting in the sensitivity testing, with small adjustments made over the 2018-2033 plan period, changing the starting value of 1.12 to a final value of 1.10, thus reducing the net-outflow balance. This reflects the Council's economic ambition to both attract new employment to the County and encourage people to reduce travel by working from or near home. There has been a fundamental shift in working practices since the Covid-19 pandemic with an increased propensity to work from home/remotely. Welsh Government's Building Better Places acknowledged that this trend is likely to continue longer term, with Welsh Government ambition being for 30% of the workforce to work remotely on a regular basis¹⁰. This will provide residents with the opportunity to both live and work in the County in this new way, whilst also achieving the Welsh Government and Council's aim of reducing the need for commuting. This will help to reduce congestion and pollution, improve the work-life balance for employees and employers, support local businesses/ services and enable the creation of sustainable vibrant communities. This approach will also support the Council's Climate Emergency declaration and the strengthened emphasis on nature recovery (RLDP Objectives 1, 14, 15 and 17).
- 2.9 The sensitivity testing thus aims to create a more balanced population structure to ensure that the County has a sufficient population base of working aged people to support the economy and to ensure our communities are sustainable and resilient, and to provide a level of growth that can provide opportunities for younger people to both stay in and move into the area, whilst at the same time reducing out-commuting. When applying these assumptions this results in a requirement for 5,400 homes (360 pa) over the Plan period.

Identifying the Amount of Housing Land Required in the RLDP

- 2.10 The RLDP must ensure that there is a sufficient supply of land for housing to meet the housing requirement identified and should clearly identify the components of housing supply by settlement/settlement category to support the housing policy framework. This will demonstrate how the different components of supply make up the total Plan provision and crucially, how these homes will be spatially distributed. To identify the amount of land the Council will be required to allocate for housing in the RLDP to meet the housing requirement, an analysis needs to be made of the various components of housing supply, including existing commitments¹¹, trend based small site and windfall site completions expected over the Plan period plus any extant LDP allocations that can be 'rolled forward' to the Replacement Plan. This paper analyses each component of housing supply in more detail before arriving at a new allocations requirement based on the methodology detailed within the Welsh Government Development Plans Manual Edition 3 (March 2020).

¹⁰ Smarter working: a remote working strategy for Wales [HTML] | GOV.WALES

¹¹ Existing commitments comprise units currently under construction and large sites with planning permission as at 31 March 2022 included on the site schedule for the annual Housing Land Monitoring.

3. Housing Delivery Commitments

3.1 Housing delivery commitments include the number of homes completed since the start of the RLDP period (2018), homes currently under construction and those already with planning permission. The 31st March 2022 based survey of sites for the annual monitoring of housing land provides the most recent evidence on housing completions and supply in this respect and is therefore the starting point to identify these commitments. The latest monitoring of housing land in the County identifies a supply of 2,840 homes, which reflects the realistic level of potential supply within the current housing delivery commitments. The potential housing delivery commitments are further categorised according to the different components of supply to inform how the RLDP's housing requirement will be met.

Dwellings Completed Since 1st April 2018

3.2 The RLDP requires 5,400 new homes to be accommodated in the County during the 15 year RLDP period from 2018-2033. However, 1,579 homes have already been delivered since the start of the Plan period as summarised in Table 2 below. This equates to the first four years of the RLDP plan period and the residual requirement is therefore 3,821 homes up to 2033.

Table 2: Completions (RLDP Period)

Total Completions 1 st April 2018 – 31 st March 2022	Large Site Completions	Small Site Completions
1,579	1,265	314

Sites with Planning Permission

3.3 Sites that already have planning permission form another significant component of supply, including developments that are already under construction and those approved subject to the signing of a s106 agreement. Table 3 summarises sites incorporated within the most recent site schedule for the annual monitoring of housing land that meet this criteria. All of the developments included within the schedule are being progressed and there is confidence that they will come forward over the course of the RLDP period, justifying their inclusion within the 'Commitments' strand of supply. Details of sites included within Table 3 are provided in Appendix 1 for reference.

Table 3: Commitments – Sites with Planning Permission (1st April 2022)

Settlement	Sites with Planning Permission
Abergavenny (including Llanfoist)	132
Caldicot (including Severnside)	723

Settlement	Sites with Planning Permission
Chepstow	267
Monmouth (including Wyesham)	11
Raglan	45
Rural sites	83
Total	1,261

- 3.4 The Development Plans Manual states that the 'land bank' should be derived from the latest position agreed with the Housing Stakeholder Group (HSG) as this will result in a relative degree of certainty in the sites included and their phasing. All of the sites included at Appendix 1 have been agreed with the HSG. However, the Manual goes on to say that including the entire land bank in numerical terms in the housing provision can be a high-risk strategy. If sites do not come forward as anticipated, or other issues arise, lack of delivery can result in a potential shortfall in homes. The Manual advises that having a non-delivery allowance in the Plan can help avoid any such shortfall from this element of supply.
- 3.5 A land bank non-delivery allowance is applied only to this element of supply and is separate to the flexibility allowance which is applied to the Plan as a whole. A non-delivery allowance can either be applied as a percentage across the overall land bank or sites can be discounted individually. Based on officer knowledge of sites, it has been decided to discount three sites which it is considered will not come forward during the Plan period. Two of the sites, Mulberry House Abergavenny and Osborne International, Chepstow have been in the land bank for many years and whilst the sites have started, progress has been very slow/or stalled. The third site, Rockfield Road Monmouth has a current outline planning permission but is unable to proceed due to the phosphate issue in the upper River Wye catchment area where the site is located. It is proposed to exclude these three sites in table 4 below from this element of the land supply and therefore these sites are not included within the 1,261 homes in the commitments.

Table 4: Sites with Planning Permission (Excluded from Commitments)

Site	Number of Homes
Mulberry House, Abergavenny (conversion)	18
Osborne International, Chepstow	125
Rockfield Road, Monmouth	130
Total	273

Sites without Planning Permission (Excluded from Commitments)

- 3.6 A number of allocated Main Village sites do not currently benefit from planning permission and are therefore not strictly compliant with the Development Plans

Manual definition of 'Land Bank Commitments' for the purposes of this paper. This amounts to a total of 120 homes.

- 3.7 The Main Village sites in the Adopted LDP were specifically allocated to provide affordable housing to meet local needs, with 60% of the proposed homes to be affordable. Whilst some allocated village sites have come forward to date there are several where no meaningful progress has been made. If it is determined that a village site is unviable or cannot otherwise be delivered, it will not be re-allocated in the RLDP. To safeguard against non-delivery, all Main Village sites without a planning permission are therefore initially discounted from the commitments strand of supply within this paper. Each of these sites will be monitored and subject to review as part of the RLDP and future Annual Monitoring Reports for the Adopted LDP. Any subsequent progress will be factored into this paper to ensure the commitments form of supply is as accurate as possible.

4. 'Rollover' Housing Allocations

- 4.1 The remaining element of housing supply stems from specific LDP housing allocations, within the Primary Settlement of Monmouth and the Severnside settlement of Magor Undy, which do not currently have a planning permission and so are excluded from Table 3 above. Before considering the allocation of any new sites for housing, it is important to assess all current large allocations that have not yet come forward under the Adopted LDP and to determine whether circumstances have now changed to justify their inclusion in the RLDP. There are three such Adopted LDP allocations that meet this criterion, these are considered 'Rollover Allocations' capable of delivering 370 homes in total.
- 4.2 Table 5 below shows the situation with regard to the number of homes these sites were allocated for in the Adopted LDP alongside the current position with regard to the number of homes on these allocated sites that have still to come forward.

Table 5: Rollover Housing Allocations (1st April 2022)

Rollover Allocation	Number of Homes allocated in the Adopted LDP	Number of Homes allocated in the Adopted LDP but not included in Commitments
SAH6 Land at Vinegar Hill, Undy	225	70*
SAH4 Wonastow Road, Monmouth	110	110
SAH8 Tudor Road, Wyesham	35	35
Total	370	215

*Remainder of the site allocation has planning permission for 155 homes and is included within the commitments in Table 3

4.3 In light of the information below it has been decided that these sites should not be rolled forward into the RLDP.

- **SAH6 Land at Vinegar Hill, Undy** – A hybrid application was approved on this site in June 2022 for two parcels of land for up to 155 dwellings with associated open space and infrastructure: a full planning consent for 72 dwellings on parcel A with an outline planning consent for parcel B with all matters reserved except for access. Whilst allocated for 225 dwellings in the Adopted LDP, the site is only proposed to come forward for up to 155 dwellings as the landowner of the remaining parcel of land is not bringing the land forward for development. The remaining 70 dwellings will not, therefore, be taken forward as a rollover allocation and this part of the site will be de-allocated.
- **SAH4 Wonastow Road, Monmouth** – This is the remaining area of the Wonastow Road site, also known as Drewen Farm. Whilst the rest of the site has been developed this area of the site was previously landlocked by the first phases, but cannot currently come forward due to the phosphate water quality constraint in the upper River Wye catchment. Whilst we are working with NRW, Dŵr Cymru Welsh Water, Welsh Government and the development industry to find solutions and enable progression of affected sites, there is currently no identified strategic solution to the treatment of phosphates in the upper River Wye catchment area: consequently the development of sites in the upper River Wye river catchment cannot be relied upon to contribute towards the housing requirement figure within the Plan period. As such it is proposed that the remaining 110 dwellings cannot be taken forward as a rollover allocation.
- **SAH8 Tudor Road, Wyesham** – The site has been the subject of pre-application discussion with the Council and there is an interested developer on board. However, as with Drewen Farm above, this site is located in the Upper River Wye catchment area and there is currently no identified strategic solution to the treatment of phosphates in the upper River Wye catchment area: consequently the development of sites in the upper River Wye river catchment cannot be relied upon to contribute towards the housing requirement figure within the Plan period. As such it is proposed that the 35 dwellings proposed for this site cannot be taken forward as a rollover allocation.

4.4 In accordance with PPW, rolling forward allocated sites from a previous Plan requires careful justification for inclusion in a revised Plan. There would need to be a substantial change in circumstances to demonstrate that the sites can be delivered and justify being reallocated in the RLDP. Clear evidence would be required that such sites can be delivered as they should be subject to the same candidate site process requirements as new site allocations. In this instance due to the phosphate issue in the upper River Wye catchment area, it is not proposed to allocate any new development within this part of the County in the RLDP, and as such two of the sites above, Drewen Farm Monmouth and Tudor Road, Wyesham would not currently be suitable for allocation in the Plan. However, the Development Plans Manual states that if an LPA wishes to retain such sites but cannot evidence they will be delivered,

they can still be allocated in the plan but not relied upon as contributing to the housing provision (Development Plans Manual, p120). Such sites can be treated as ‘bonus sites’. Such an approach will provide potential for development to progress in Monmouth if a strategic solution to the phosphate issue is found, meaning windfall sites within development boundaries could be developed, providing much needed homes in this area of the county. It is therefore proposed that the Drewen Farm and Tudor Road sites remain within the development boundary for Monmouth but that they do not contribute to the housing provision.

5. Allowance for Windfall Sites

5.1 Windfall sites are sites with a capacity of 10 or more homes that are not specifically allocated for housing yet come forward in accordance with the Plan. Assessing the likely contribution that such sites can make to the housing land supply requires consideration of the sites that have come forward under the respective LDP policies in recent years. Given the very nature of windfall sites, it is considered more realistic to monitor the total number of homes completed annually as opposed to the number of homes with planning consent. This helps to provide an estimate of the likely contribution windfall sites may make to the land supply. Table 6 below provides an overview of windfall site completions over the past 10 years.

Table 6: Windfall Site Completions

Year	Windfall Site Completions (>10 homes)	Percentage of Total Completions
2012/13	55	16%
2013/14	53	23%
2014/15	33	16%
2015/16	135	58%
2016/17	128	54%
2017/18	107	38%
2018/19	80	18%
2019/20	0	0%
2020/21	121	29%
2021/22	80	22%

5 Year Average	10 Year Average
78 Homes	79 Homes

5.2 Windfall site completions have varied over the past 10 years (2012-2022); ranging from 0 to 135 homes per annum or an overall annual average of 79 homes. Planning policy guidance contained in the Development Plans Manual recommends that periods of abnormally high or low completion rates are inappropriate to include in a future extrapolation rate. From Table 6 above, it can be seen that 2019/20 recorded no windfall completions whilst the two years to 2017 saw windfalls contributing over half

of the total completions. If these abnormal years are excluded from the future extrapolation rate this gives an annual average completion rate of 75 homes.

- 5.3 In September 2018, the Welsh Government suspended the five-year housing land requirement set out in TAN1 and advised that it was for Local Planning Authorities to consider how much weight should be given to its housing supply shortfall. In response, Monmouthshire County Council agreed that it would give 'appropriate weight' to the housing supply shortfall and adopted an 'unallocated sites' policy, setting out eleven ground rules to guide the consideration of applications for residential development beyond the adopted LDP, including a non-negotiable requirement for 35% affordable housing. Four sites were considered under this unallocated sites policy:
- **Church Road, Caldicot:** approval for 130 homes on an edge of settlement site. This site is under construction;
 - **Grove Farm, Llanfoist:** approval for 106 homes on an edge of settlement site. This site is under construction;
 - **Rockfield Road, Monmouth:** approval for 130 homes on an edge of settlement site. This site has been stalled by the phosphates issue;
 - **Monmouth Road, Raglan:** Ministerial call-in refusal for 111 homes on an edge of village site.

The latter decision and further clarification from Welsh Government on its policy position meant the 'unallocated sites' policy ceased to be used. However, it is worth noting that the 236 homes approved and under construction will distort the windfall site trend in coming years and partly offset the downturn caused by the phosphates issue.

- 5.4 There are 11 years remaining of the RLDP, however to avoid any double counting, as windfall sites with current permission are already included within the existing commitments, the first 5 years of the remaining Plan period are excluded from the calculation. If it were to be assumed that windfall sites will contribute a similar number of homes to the forthcoming housing land supply as the future extrapolation indicates this produces a projected windfall allowance of 450 homes over the lifetime of the RLDP (75 homes per annum average x 6 years).
- 5.5 In order to identify where these windfall sites could potentially come from a Housing Potential Study (HPS) has been undertaken. This study has looked at the availability of land and under used buildings within the primary and secondary settlements of Monmouthshire, this includes possible regeneration schemes within settlements and empty homes and upper floors within town centres which have the potential to provide additional homes. This helps to establish the capacity for housing development on previously developed land within these settlements and can also inform decisions on how much greenfield land may be required for development within the RLDP. The HPS is included at Appendix 2.
- 5.6 The HPS has identified windfall opportunities in our primary and secondary settlements that equate to around 215 homes (36 homes per annum over the last six years of the Plan period – see paragraph 5.3), which is much lower than the future extrapolation

rate above of 75 dwellings per annum would suggest. There have, however, been certain contextual changes in recent years which will no doubt impact on the level of windfalls we are likely to see going forward. In March 2020, Welsh Government announced changes to the way in which housing delivery is monitored. The changes to PPW removed the five-year housing land supply policy and replaced it with a policy statement making it explicit that a plan-led approach is the most effective way to secure sustainable development through the planning system. This also involved the revocation of Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (January 2015) in its entirety as a consequence of the policy change to PPW. With a lack of brownfield land available in our settlements and the increased emphasis on a plan-led delivery of homes the opportunities for windfall development in the county are likely to be less than seen in the past.

- 5.7 In addition to this recent policy change, any new windfall development in the County is likely to be impacted by the issue of water quality in our Rivers. Following new evidence about the environmental impacts of phosphate in watercourses, Natural Resources Wales (NRW) has adopted tighter targets for the water quality of watercourses, both the River Usk and the River Wye have been affected by this with any new development within their catchment areas needing to demonstrate phosphate neutrality or betterment. Following discussions with Dŵr Cymru/Welsh Water (DCWW) and NRW, it has become apparent that whilst a workable solution to this water quality issue is achievable for the River Usk catchment, there is no identified strategic solution for phosphate mitigation in the upper River Wye catchment at this time. This will continue to impact on any possible windfall development within the upper River Wye catchment. All settlements within the Upper River Wye catchment therefore need to be discounted from the windfall calculation at this point in time.
- 5.8 Not only is the issue of phosphates in our rivers likely to impact on future windfall permissions in the upper River Wye Catchment Area, there has also been an impact on permissions in both the River Wye and the River Usk catchment areas over the past two years due to the introduction of measures in January 2021 to control phosphate levels in both river catchment areas. This covers a large area of Monmouthshire and has impacted on our ability to grant planning permissions in a significant proportion of the County. This is likely to impact on windfall completions going forward.
- 5.9 For the reasons given above and to ensure that there is sufficient certainty that the level of windfalls included within the landbank is likely to come forward, the decision has been taken to include only the windfalls evidenced within the HPS in the calculation of the number of windfalls likely in the final 6 years of the Plan, some 210 homes. This is an approximate figure at this stage and is calculated by rounding the figures that are likely to be achievable for each settlement. It should be noted, however, that the HPS is a living document and as such will be updated at key stages of the RLDP preparation process to reflect the most up to date information. In addition, further progress may be made in finding a solution to the phosphate issue in the Upper Wye Catchment Area, the proposed windfall allowance will be re-assessed in light of any changes for the RLDP Deposit Plan.

6. Allowance for Small Sites

- 6.1 Small sites are sites that accommodate fewer than 10 homes. They make an important contribution to the overall housing land supply, introducing an element of choice and flexibility into the housing market. An allowance therefore needs to be made for small sites that are likely to be delivered over the Plan period based on an assessment of past trends. Table 7 below outlines the number of small site completions over the past 10 years.

Table 7: Small Site Completions

Year	Small Site Completions (<10 homes)	Percentage of Total Completions
2012/13	94	27%
2013/14	59	26%
2014/15	99	48%
2015/16	99	42%
2016/17	74	31%
2017/18	78	28%
2018/19	84	19%
2019/20	104	29%
2020/21	81	19%
2021/22	45	12%

5 Year Average	10 Year Average
78 Homes	82 Homes

- 6.2 The most notable trend evident from Table 7 is the relative stability in the number of homes delivered per annum on small sites and their contribution to total completions. The range of completions year to year is relatively narrow; with 82 homes per annum on average over the past 10 years (2012-2022). Indeed, the number of completions has seldom fallen below 80 homes per annum which reflects the unique mechanics of small site delivery. Whilst average small site completion numbers have not proved significantly changeable, it is logical to base the future extrapolation rate on the same trend based time period used to inform the initial calculation of the windfall site allowance, that is a ten year average (2012/13 to 2021/22). This gives a projected small site allowance of 82 homes per annum or 902 homes over the remaining 11 years of the RLDP period. The full 11 years of the remaining Plan period need to be taken into account as small sites are not included within the existing commitments detailed in Table 3.
- 6.3 Small site completions make an important contribution to the land supply. As with the windfall sites, it is useful to identify where these sites could potentially come from. As with the windfall sites, completions on small sites are currently being impacted by the issue of phosphates in both the River Usk and upper River Wye catchment areas, with completions in the latest year at the lowest level seen for some time. This trend will continue due to phosphates impacting the number of planning permissions granted.

Whilst there is a workable solution to this water quality issue achievable for the River Usk catchment, there is no identified strategic solution for phosphate mitigation in the upper River Wye catchment at this time. This needs to be taken into account when considering the contribution of small sites to the land supply during the RLDP period. If small site completions in those settlements in the upper River Wye catchment area are excluded from the extrapolation rate, this gives an annual completion rate of 65 homes or 720 homes on small sites over the remaining 11 years of the plan period.

- 6.4 Whilst there are still opportunities for small site development within our larger settlements, it is considered that these opportunities are becoming more limited in our rural areas. Officers have undertaken an assessment of the possible small site opportunities within the existing development boundaries of the main rural settlements, infill opportunities within minor rural settlements and also considered past trends in barn conversions in the County. This assessment only looked at sites for less than 5 dwellings. This has identified that there is limited scope for small site development within our existing rural settlements with many of the development opportunities already taken. Based on past trends and excluding those settlements within the upper River Wye catchment area from the future extrapolation rate, we would expect some 217 completions in the rural areas on sites of less than 5 over the remainder of the RLDP period (20 homes per annum). It is proposed to discount 20% of these to represent a more realistic completion rate given the limited opportunities available. Taking into account the exclusion of settlements in the upper River Wye catchment area from the extrapolation rate and the 20% discount applied to small sites of less than 5 in our rural areas, an allowance has been made for an average of around 63 homes per annum to come from this source of housing supply (690 homes).

7. Housing Requirement

- 7.1 Having considered the current possible housing land supply in the County, this section of the paper provides details of how far each strand of this housing land supply can contribute towards meeting the identified housing provision, including a flexibility allowance. The residual balance represents that element of the housing provision that will need to be met by identifying new housing land allocations in the RLDP.
- 7.2 In accordance with the Development Plans Manual (WG, March 2020) a flexibility allowance has been included within the calculation. This is necessary in the event that certain sites do not come forward as expected during the Plan period. This allowance has initially been set at 10%, although this level will be subject to refinement as more detailed site viability and deliverability work is completed and the housing trajectory is further developed. The flexibility allowance provides a further safeguard to ensure delivery of the housing requirement (in addition to discounting those sites currently within the land supply that do not yet benefit from planning permission or those impacted by the phosphate issue in the upper River Wye catchment area).

Table 8: RLDP Preferred Growth Strategy - RLDP Dwelling Provision

Element	Number of Homes	Notes
Housing Provision	5,940	RLDP Preferred Strategy 2018-2033 Housing requirement = 5,400 + 10% flexibility allowance, to be considered further in the Deposit Plan
Less Commitments:		
2018-22 Dwelling Completions	1,579	Comprises 1,265 homes on large sites and 314 homes on small sites
Existing Land Supply Commitments	1,261	Sites have only been included if construction is already underway or they have planning permission or have planning permission subject to the signing of a S106 agreement as at 01/04/22, and they are expected to come forward over the Plan period. Three sites have been discounted from this element of supply due to non-delivery. *
Less Allocations:		
LDP 'Rollover Allocations'	0	Rollover Allocations are Adopted LDP large site allocations which do not currently benefit from a planning permission. There are three sites which meet this definition, two of these sites cannot proceed due to phosphate issues and do not align with the new Spatial Strategy, being located in the upper River Wye catchment, and the remainder of the final site is not proposed to be brought forward by the landowner **
Revised Provision	3,100	
Less Allowances:		
Windfall Allowance (>10 homes)	210	The windfall allowance is based on the number of homes estimated to be achievable on sites included within the Housing Potential Study. This excludes any settlements within the upper River Wye catchment area. An allowance of 210 homes (35 homes per annum) is included for the last 6 years of the Plan period (2027 – 2033). Windfalls for the first 4 years of the plan period (2018-2022) are included

Element	Number of Homes	Notes
		within the completions. Windfall sites with current permission are included within the existing commitments. To avoid double counting the first 5 years of the remaining Plan period are excluded from the calculation (2022 – 2027).
Small Site Allowance (<10 homes)	690	<p>If the small site allowance is calculated on the basis of the remaining 11 years of the Plan period (2022-2033), an allowance of 902 homes (82 homes per annum) would need to be included based on an average of small site completions over the past 10 years (2012-2022).</p> <p>Due to the impact of phosphates on the ability of small sites to come forward in settlements in the upper River Wye catchment, if these settlements are excluded from the future extrapolation rate this results in a small site allowance of 720 homes (65 homes per annum).</p> <p>Following an appraisal of small site opportunities, the allowance for sites of less than 5 homes in rural settlements has been discounted by 20%.*** This results in a small site allowance of 690 homes (63 homes per annum)</p>
Total New Allocations Provision	2,200	

*Please see paragraph 3.4 – 3.5

**Please see section 4

***Please see paragraph 6.4

8. Affordable Housing

- 8.1 The Issues, Vision and Objectives Paper¹² notes that due to high average house prices and high prices in relation to earnings there is a pressing need for affordable housing in the County. The average house price in Monmouthshire is £398,859 (£236,439 for Wales as a whole) with the lower quartile house price to income ratio in the County standing at 11:1 for Monmouthshire workers (8:1 for Wales as a whole)¹³. Consequently, a significant proportion of people cannot afford to buy or rent a home so either leave the County or have to live with their parents or in shared housing for longer. The Covid-19 pandemic further increased the need for affordable homes and revealed the extent of homelessness in the County. The Minister, formerly known as the Minister for Housing and Local Government, announced that post-Covid-19, no-one should return to the streets and Welsh Government's Building Better Places response to Covid-19 also highlights how the delivery of new social and market housing can make a significant contribution to economic recovery and social cohesion. Taking into account existing planning permissions and projected allowances in the housing land supply, the growth level resulting from the demographic-led strategy with added assumptions offers scope to address this affordable housing need.
- 8.2 One of the key objectives of the RLDP Preferred Strategy is to seek to maximise the delivery of affordable homes to help address inequality and rebalance the County's demography to ensure communities are socially and economically sustainable (RLDP Objectives 9,10,11,12 and 13). The Council consider it necessary to directly address this issue and are committed to the provision of 50% affordable homes on all new sites. The proposed 50% affordable homes provision on new sites has regard to the Minister for Housing and Local Government's letter of July 2019 (Appendix 3). The letter states that when reviewing LDPs, Local Planning Authorities must make provision for affordable housing-led sites including at least 50% affordable housing. The Minister goes on to say that in the first instance affordable housing-led housing sites should make use of public land and, where this is not available, then privately owned land may be identified. This approach is reiterated in Future Wales: The National Plan 2040, Policy 7 – Delivering Affordable Homes, which encourages local authorities, registered social landlords, and small and medium sized construction and building companies to build more homes and facilitate the reuse of publicly owned land to help support the provision of affordable housing-led developments.
- 8.3 Planning Policy Wales (Edition 11, February 2021) at paragraph 4.2.32 further supports this approach by stating that planning authorities must make provision for affordable housing-led housing sites in their development plans. It notes that such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities. The Council has given due consideration to identifying appropriate sites through the Candidate Site process. When considering the appropriate mix of housing

¹² The Issues, Vision and Objectives Paper (Updated December 2022) is available to view via <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

¹³ Hometrack, data accessed 09/11/2022

on these sites the Council is also mindful of the need to consider the viability and deliverability of sites and our aim to facilitate mixed, balanced, sustainable and resilient communities for all.

- 8.4 The latest Local Housing Market Assessment (LHMA)¹⁴ (December 2020) forms the starting point for establishing the need for affordable housing in the County. This establishes an annual affordable housing need figure of 467.81 dwellings per annum for the five-year period (2020-2025). Extrapolated over the 15-year Plan period this results in a total need for some 7,017 affordable dwellings (467.81 x 15). It is widely accepted that the affordable housing need figure established in the LHMA is beyond the scope of the Development Plan process to deliver in isolation, with other mechanisms available outside of the planning system also playing a role. Nevertheless, the RLDP Preferred Growth Strategy will directly address housing affordability within the county with a policy approach to provide additional affordable homes by 50% provision being sought on all new sites.
- 8.5 Table 9 below summarises the components of the affordable housing target for the RLDP Preferred Growth Strategy. This shows that by achieving 50% affordable housing on all new sites the Plan will deliver between 1,580 and 1,850 new affordable homes over the Plan Period.

Table 9 – Summary of Affordable Housing Provision

Source of Affordable Housing	No. of affordable homes
Housing Delivery Commitments Affordable homes secured on sites either already completed or agreed on existing commitments based on the current Adopted LDP affordable housing percentage thresholds.	600
Housing Allowances Affordable homes arising from the windfall and small sites allowances. The percentage of affordable housing on small sites is based on the existing Adopted LDP affordable housing percentage thresholds whilst the percentage on windfall sites is based on the 50% threshold. The existing percentage thresholds will be updated to reflect the outcomes of the emerging viability work.	150
RLDP Preferred Growth Strategy Affordable Homes to be sought on new housing allocations based on 50% threshold.	830 – 1,100
Overall Target	1,580 – 1,850

- 8.6 A total of 319 affordable homes have been completed over the 2018 – 2022 period, and a further 281 homes are either under construction or benefit from planning

¹⁴ The Local Housing Market Assessment is available to view <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

permission. Combined these contribute 600 affordable homes to the affordable housing target.

- 8.7 The small site allowance is estimated to contribute 45 homes to the affordable housing target. This estimation is based on current policy thresholds for the small site allowance and so may be subject to change as the Plan progresses and further viability work is undertaken. Affordable homes are anticipated to only arise from small sites between 5 -9 homes. Sites of 4 or fewer homes it is assumed will be required to pay a commuted sum towards off-site affordable housing provision, however, this will be considered further as part of the emerging viability work.
- 8.8 The windfall site allowance is estimated to contribute some 105 homes to the affordable housing target. This estimation is based on the 50% affordable housing threshold in line with the requirement for all new sites to deliver 50% affordable homes.
- 8.9 New housing allocations will be identified in the Deposit RLDP to address the residual dwelling requirement identified in relation to the Strategy once the above commitments and allowances have been accounted for. At present this is estimated to contribute between 830 - 1,100 affordable homes to the target. This estimation is based on all new allocations delivering 50% affordable homes.
- 8.10 The RLDP Deposit Plan will contain detailed policies setting out thresholds for small sites at which development will be required to provide affordable housing and the associated percentages of affordable housing provision that will be applied across the county, having regard to viability considerations. An Affordable Housing Viability Study will be undertaken to inform the appropriate thresholds and percentages set out in the Deposit RLDP. All relevant figures will be updated to reflect the outcome of this work.

9. RLDP Preferred Strategy - Spatial Distribution of Growth

- 9.1 As well as setting out the preferred level of growth required over the Plan period, the RLDP Preferred Strategy must also put forward a clear spatial strategy for where this growth should be located in the County. In September 2022 Council endorsed the proposal to proceed with a new spatial strategy that responds to the challenges set out above and maximises delivery of the core issues and objectives within the environmental and national policy constraints. The Preferred Strategy seeks to focus growth in the primary settlements of Abergavenny (including Llanfoist), Caldicot (including the Severnside area), and Chepstow, as well as some growth in our most sustainable rural settlements to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas. The proposed spatial distribution of growth will assist in addressing the key issues/objectives that we are seeking to address in the RLDP, specifically issues 5, 6 and 8 relating to employment and economy, issues 22, 24, 25, 26, and 27 relating to population and housing and objectives 1 (economic growth/employment), 9 (demography), 10 (housing), 12 (communities), 13 (rural communities) and 17 (climate and nature emergency). A full

description of the issues and objectives for the RLDP can be found in the RLDP Preferred Strategy.¹⁵

- 9.2 The identification of the Preferred Spatial Strategy has been informed by a range of considerations, including the findings of the Initial Integrated Sustainability Appraisal (Initial ISA), the Sustainable Settlement Appraisal, the issue of phosphates in our rivers, Future Wales 2040 (which is a statutory development plan), the LDP tests of soundness, Welsh Government’s Building Better Places, and the pressing need to address the key challenges relating to the County’s demography, affordability and the climate and nature emergency to achieve a sustainable balanced deliverable outcome.

Identification of our most Sustainable Settlements

- 9.3 A Sustainable Settlement Appraisal (SSA)¹⁶ has been undertaken which groups the County’s settlements into tiers based on their role and function. The appraisal sets out the methodology used to assess the sustainability of each settlement, based on three principles, transport and accessibility, facilities and services, and employment provision. The size of each settlement is also taken into account in the final assessment. The appraisal confirms the dominant role of the primary settlements of Abergavenny, Caldicot, Chepstow and Monmouth. The report recognises that some of the lower tier settlements have a close geographical and functional relationship with a Tier 1 settlement and have therefore been clustered together. The settlements along the M4 corridor in particular exhibit a strong geographical and functional relationship and collectively form the Severnside Area centred around the primary settlement of Caldicot and include Magor Undy, Rogiet, Caerwent, Portskewett, Sudbrook and Crick. Similarly, the appraisal recognises the strong relationship between Abergavenny and Llanfoist and Monmouth and Wyesham. Table 10 below shows the settlement hierarchy arising from the SSA.

Table 10-Settlement Hierarchy arising from the SSA

Primary Settlements	Abergavenny (including Llanfoist) Caldicot (including Severnside) Chepstow Monmouth (including Wyesham)
Secondary Settlements	Penperlleni, Raglan, Usk
Main Rural Settlements	Devauden, Dingestow, Little Mill, Llandogo, Llanellen, Llangybi, Llanover, Llanvair Discoed, Mathern, Pwllmeyric, Shirenewton Mynydd bach, St Arvans, Tintern, Trellech, Werngifford/Pandy
Minor Rural Settlements	Bettws Newydd, Broadstone/Catbrook, Brynygwenin, Coed y Paen, Cross Ash, Cuckoo’s Row, Great Oak, Grosmont, Gwehelog, Llanarth, Llanddewi

¹⁵ The RLDP Preferred Strategy is available to view via <https://www.monmouthshire.gov.uk/planning-policy/plan-preparation/preferred-strategy/>

¹⁶ <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

	Rhydderch, Llandegveth, Llandenny, Llangwm, Llanishen, Llansoy, Llantilio Crossenny, Llantrisant, Llanvair Kilgeddin, Llanvapley, Mitchel Troy, Penallt, Penpergwm, The Bryn, The Narth, Tredunnoch
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9.4 The appraisal identifies the Primary Settlements as the most sustainable locations for future growth as they provide the best access to public transport and active travel and a broad range of facilities, services and employment opportunities for residents. As a predominantly rural county, the four primary settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside), Chepstow and Monmouth (including Wyesham) are also where the majority of our residents live, accounting for 68% of the population in the Local Planning Authority Area.¹⁷ However, it is also important that a proportionate amount of growth is directed towards our most sustainable rural settlements to sustain their existing services/facilities, to deliver much needed affordable homes and to address rural inequality and rural isolation in these areas.

9.5 Table 11 shows the broad distribution of the population of the County at the time of the 2021 Census. Whilst 26% of the population reside in rural areas this encompasses the large areas of Monmouthshire which are open countryside or minor rural settlements and as such these areas would not be expected to have any significant growth.

Table 11: Settlement Population

Settlement	Population	%
Primary Settlements		
Abergavenny (incl. Llanfoist)	15,438	18
Caldicot (incl. Severnside)	21,296	24
Chepstow	11,939	14
Monmouth (incl. Wyesham)	10,675	12
Total	59,348	68
Secondary Settlements		
Penperlleni	1,396	2
Raglan	1,176	1
Usk	2,628	3
Total	5,200	6
Rural Areas	22,151	26
Total	86,699*	100

*Excludes those areas within the Brecon Beacons National Park

Areas with the Highest Level of Affordable Housing Need

- 9.6 The Preferred Strategy seeks to maximise the delivery of affordable homes to help address inequality and rebalance the County’s demography to ensure communities are socially and economically sustainable. The proposed spatial distribution of growth also reflects where the affordable housing need is within the County, focusing on those sustainable settlements with the highest level of housing need, as evidenced by the Local Housing Market Assessment (December 2020)¹⁸ and the most up to date waiting list information available. As we are unable to direct growth to the Monmouth Housing Market Area due to water quality constraints, if a need cannot be met within a specified settlement then development will be directed towards another settlement in the same Housing Market Area. If the need cannot be met in a settlement in the same Housing Market Area, then it will be met in a settlement in the closest Housing Market Area.
- 9.7 Whilst the total level of need for affordable housing can be identified from the latest LHMA, as discussed in section 8, the assessment does not disaggregate the need to individual Housing Market Areas. Local waiting lists have therefore been used to establish the need at this level. There are three housing market areas in the County: Abergavenny, Chepstow/Caldicot and Monmouth. A map of the Housing Market Areas is included at Appendix 4. Table 12 below shows the number of households on the housing register broken down by each Housing Market Area (this excludes those residents within the Brecon Beacons National Park area of the County). This distribution of need is reflected in the spatial strategy of the RLDP Preferred Strategy.

Table 12: Affordable Housing Need by Housing Market Area

Settlement	Affordable Housing Need	Number of Affordable Homes to be Delivered in the RLDP
Abergavenny Housing Market Area	647	544
Chepstow and Caldicot Housing Market Area	1102	1,226
Monmouth Housing Market Area	324	80
Total	2,081*	1,850

*Excludes those on the Register in the Brecon Beacons National Park area of the County

Source: Homesearch Register (Accessed July 2022)

¹⁸ <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

Impact of Phosphates on our Spatial Strategy

- 9.8 As a result of recent evidence regarding the environmental impacts of phosphate in watercourses, Natural Resources Wales (NRW) adopted tighter targets for the water quality of watercourses and conducted an assessment of the 9 riverine Special Areas of Conservation (SAC) in Wales. This assessment has established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.
- 9.9 In response, NRW has issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. Following discussions with Dŵr Cymru/Welsh Water (DCWW) and NRW, it has become apparent that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste water Treatment Works (WwTW) (River Usk catchment), there is no identified strategic solution for phosphate mitigation at the Monmouth WwTW (upper River Wye catchment) at this time. Without an identified deliverable solution, it will not be possible to demonstrate that sites in the upper River Wye catchment area are deliverable
- 9.10 As discussed earlier in the paper, the issue of phosphate water quality in the Rivers Wye and Usk has been taken into account when considering how our commitments and proposed allowances will contribute to dwelling growth during the Plan period. However, it also necessitates that we give further consideration to where future growth in the county can be directed. It is recognised that the Preferred Strategy is unable to deliver the Council's objectives, including the delivery of new affordable homes, in those settlements in the phosphate affected upper River Wye catchment. This includes the primary settlement of Monmouth. A map of the affected area of the County is included at Appendix 5. In contrast, strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area. This will enable sustainable growth within the most sustainable settlements within the River Usk catchment area over the Plan period. If a strategic solution to the phosphate issue is developed in the Monmouth WwTW during the Plan period, then sites within development boundaries could be developed. In accordance with the Development Plans Manual, these will be considered as 'bonus sites' and will not count towards our housing figures.

Preferred Spatial Strategy

- 9.11 Table 13, below, shows the proposed spatial distribution of housing provision for the RLDP. This has been arrived at through the consideration of the contribution of all strands of housing supply, i.e. completions, land bank commitments, LDP 'Rollover Allocations', windfall site and small site allowances and new allocations. This also

reflects the Preferred Strategy to focus growth in our most sustainable settlements to address affordable housing need whilst meeting the challenges we face with regard to phosphate water quality in our rivers. At this stage the percentages are only intended to show a broad distribution of growth, the exact distribution of development will be identified in the Deposit RLDP. Any decisions on whether or not to allocate particular sites for development will also depend on such issues as their impact on the physical form of the settlement, placemaking, carbon footprint, landscape setting, environmental constraints and infrastructure capacity.

9.12 At this stage of the process it is important to stress that whilst the Preferred Strategy identifies preferred strategic site allocations for the Primary Settlements of Abergavenny (incl. Llanfoist), Caldicot (incl. Severnside) and Chepstow, the figures included in Table 13 are indicative only as additional sites will be required to fulfill the housing requirement set out in the Strategy, these will be identified in the Deposit Plan. A Second Call for Candidate Sites was undertaken in the summer of 2021, this generated a total of 159 candidate site submissions for development/redevelopment for a range of uses, including residential, employment and recreation uses. These have been published in a Candidate Site Register for informal consultation alongside the consultation on the RLDP Preferred Strategy. Following the consultation on the Preferred Strategy the Council will undertake a detailed assessment of all sites to ensure delivery of the Plan's Strategy, including the provision of:

- 50% affordable homes;
- Net zero carbon ready homes;
- Necessary supporting infrastructure;
- A masterplanning process to ensure allocations create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
- A financial viability assessment to ensure sites are deliverable within the Plan period.

9.13 This assessment will provide a high degree of confidence that the sites included within the Deposit Plan are viable and deliverable, considering the full range of associated infrastructure requirements and placemaking principles to deliver the RLDP Preferred Strategy.

Table 13 RLDP Preferred Growth Strategy - Spatial Distribution of Housing

Settlement	Components of Housing Supply										Total Housing Provision Preferred Strategy	Total Housing Provision Preferred Strategy (%)
	Housing Delivery Commitments				Allowances				RLDP New Housing Allocations	RLDP New Housing Allocations (%)		
	Total Completions 2018-22 (small & large sites)	Existing Land Supply Commitments	LDP 'Rollover' Allocations	Total Commitments	Small Site Allowance (<5 dwellings)	Small Site Allowance (5-9 dwellings)	Windfall Allowance (>10 dwellings)	Total Allowances				
Primary Settlements												
Abergavenny (incl. Llanfoist)	426	132	0	558	85	70	90	245	600	27	1403	24
Caldicot (incl. Severnside)*	466	723	0	1189	150	10	60	220	1200	54	2609	44
Chepstow	192	267	0	459	100	25	40	165	145	7	769	13
Monmouth (incl. Wyesham)	264	11	0	275	0	0	0	0	0	0	275	5
Total	1348	1133	0	2481	335	105	190	630	1945	88%	5056	86%
Secondary Settlements												
Penperlleni	73	0	0	73								
Raglan	4	45	0	49								
Usk	23	0	0	23								
Total	100	45	0	145	50	10	20	80	155	7%	380	6%
Rural Settlements	131	83	0	214	175	15	0	190	100	5%	504	8%
TOTAL	1579	1261	0	2840	560	130	210	900	2200	100%	5,940**	100%

*Includes the Severnside Settlements of Caerwent, Crick, Magor Undy, Portskewett, Rogiet & Sudbrook

**The housing provision figures include a 10% flexibility allowance which will be reviewed and refined as part of the Deposit RLDP preparation process

10. RLDP Growth and Spatial Strategy

- 10.1 The total housing requirement/provision figure that will deliver the RLDP Preferred Strategy is based on a demographic-led scenario with added assumptions to address the County's key demographic, economic and affordability issues. The provision of 5,940 homes will deliver the housing requirement of 5,400 homes allowing for flexibility. This 10% flexibility allowance will be further reviewed and refined as the Deposit Plan preparation progresses.
- 10.2 Additional flexibility has been incorporated into the Plan by discounting some sites within the housing land supply that do not currently have planning permission, as well as a land bank non-delivery allowance to account for where sites with planning permission have not delivered as anticipated and so could result in a potential shortfall in homes. This will again be kept under review as the preparation of the Deposit Plan progresses. Incorporating flexibility into the Plan safeguards against under-delivery.
- 10.3 Taking account of the existing land supply commitments, the RLDP Preferred Strategy makes provision for new sites that will deliver 2,200 homes over and above the existing commitments. The Primary Settlements of Abergavenny (including Llanfoist), Caldicot (including Severnside) and Chepstow have been identified as being the most sustainable locations with capacity to deliver more significant growth, followed by the three Secondary Settlements of Penperlleni, Raglan and Usk. Some development will also be directed towards the County's most sustainable rural settlements to support/enhance such areas and address affordable housing need and rural isolation. The spatial distribution of growth also reflects the restrictions on new development in the upper River Wye catchment.
- 10.4 The level of growth directed towards a settlement will reflect its role and function and will contribute towards addressing the affordable housing need as identified in the LHMA in both urban and rural areas, accepting that the Plan cannot meet all of this need in isolation. Where the proposed level of growth cannot be met in an individual settlement, development will be directed towards a same tier or a higher tier settlement within the same or the closest Housing Market Area. In line with National Policy, and the Council's objective to deliver much needed affordable homes all new sites will provide for 50% affordable homes.

Appendix 1: Sites included within Table 3 – Sites with Planning Permission (1st April 2022)

Settlement	Site Name	Homes not yet completed on Sites with Planning Permission (1st April 2022)
Abergavenny (including Llanfoist)	Ross Road, Abergavenny	9
	Mulberry House (new build), Abergavenny	7
	Deri Farm, Abergavenny	16
	Land at Grove Farm, Llanfoist	100
Total		132
Caldicot (including Severnside)	Church Road, Caldicot	86
	Rockfield Farm, Undy	120
	Rockfield Farm (Phase 1), Undy	38
	Land at Vinegar Hill, Undy	155
	Crick Road, Portskewett	269
	Green Farm, Rogiet	10
	Former Paper Mill, Sudbrook	45
Total		723
Chepstow	Fairfield Mabey	267
Total		267
Monmouth (including Wyesham)	Hillcrest Road, Wyesham	11
Total		11
Raglan	Land at Chepstow Road	45
Total		45
Rural Sites	Land adjacent Cross Ash Garage	6
	Land at Well Lane Devauden	15
	Llanellen Court Farm	28
	Land north Llanfair Kilgeddin	5
	Land rear Carpenters Arms Llanishen	8
	Land south west Penallt	10
	Land adjacent Clearview Court Shirenewton	11
Total		83
Grand Total		1,261

Appendix 2: Housing Potential Study

Purpose of the Housing Potential Study

- A.2.1 The purpose of this Housing Potential Study (HPS) is to assess and estimate the contribution windfall sites (10 or more dwellings) will make to Monmouthshire's housing land supply by identifying where these windfall sites could potentially be located within the existing settlement areas of Monmouthshire.
- A.2.2 This is in association with Section 5 'Windfall Allowance' of the Housing Background Paper, which indicated a projected windfall allowance of an additional 450 homes over the last 6 years of the RLDP based on past trends.
- A.2.3 This HPS will therefore aim to identify where this projected 450 homes allowance could potentially be located by documenting and gaining an accurate understanding of the 'housing potential' (availability of land and under used buildings within the developed settlements of Monmouthshire), also known as brownfield land. It will also look for sites of under-utilised greenfield land within settlement boundaries. This is in line with PPW 11 3.43:
- 'Planning authorities must prioritise the use of suitable and sustainable previously developed land (brownfield) and /or underutilised sites for all types of development.... Planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance.... It is recognised however that not all sites of this nature are suitable for all types of development.'*
- A.2.4 This HPS will help to demonstrate the capacity for housing development within Monmouthshire's primary and secondary settlements and will help to identify brownfield land sites and inform decisions on how much greenfield land outside existing settlement boundaries may be required for housing development within the RLDP.
- A.2.5 This HPS is intended to be a live and adaptable document that will be updated throughout the preparation of the RLDP. This is because the nature of windfall sites is changeable and often unpredictable, for instance, some sites may be developed and thus taken out, and new sites may become available and added in.

Methodology

- A.2.6 In order to establish windfall capacity sites within Monmouthshire's urban areas, a methodology to identify such sites has been devised for this HPS. The methodology involves the following 3 stages:
- Stage 1: Defining the study area and site thresholds
 - Stage 2: Identifying sources of supply
 - Stage 3: Findings and conclusion

Stage 1: Defining the Study Area and Site Thresholds

- A 2.7 The first stage of the HPS involved determining the search area for identifying windfall sites. As part of the RLDP review a Sustainable Settlement Appraisal (SSA) has been prepared which evidences a sustainable settlement hierarchy that will assist in identifying which of the County's settlements are the most sustainable and have capacity to accommodate and deliver further growth. The top two settlement tiers of the hierarchy, are the settlements included within the HPS area. These are set out in table A1 below. The HPS will only consider potential sites that are within these settlement development boundaries.
- A.2.8 The HPS must also have regard to the latest position on the phosphates water quality issue and associated requirements to demonstrate neutrality or betterment when proposing development and the constraint this necessitates. Due to lack of an identified strategic solution to the treatment of phosphates at the Monmouth WwTW, it is not anticipated that windfall development can come forward within settlements that are within the upper River Wye Catchment area, which includes the Primary settlement of Monmouth. The HPS will therefore not consider sites within Monmouth.

Table A1: Study Area

Primary Settlements (Tier 1)
Abergavenny (including Llanfoist)
Caldicot (including Severnside area of: Caerwent, Crick ¹ , Magor & Undy, Portskewett, Rogiet and Sudbrook)
Chepstow
Secondary Settlements (Tier 2)
Penperllenni
Raglan
Usk

- A 2.9 In terms of the site threshold, this HPS has considered sites that are capable of accommodating a capacity of 10 or more home and based on the net density calculation of 30 dwellings per hectare².

Stage 2: Identifying Sources of Supply

- A 2.10 Stage 2 of the methodology involves the identification of potential urban housing sites that are capable of accommodating 10 or more dwellings. This has been undertaken in a variety of ways, including:
- The initial (November 2018) and second call for candidate sites August 2021

¹ Crick does not have an existing development boundary within the current LDP. However, as Crick has been identified as a sustainable cluster settlement of the Severnside area through the Sustainable Settlement Appraisal process, this HPS will assess any potential brownfield sites within and immediately adjacent to Crick's existing urban form.

² This is a crude calculation and there is some flexibility given to this calculation depending on individual site circumstances.

- A specific call for Brownfield sites in February 2019 inviting such sites to come forward, and
- Planning Policy Officers actively identifying potential sites through desktop research, site visits and consultation with Council staff.

The full range of sources and methods are set out in table A2 below.

A 2.11 Potential sites identified at this stage have only been subject to a high level assessment i.e. initial sift, to identify any insurmountable constraints to development, such as brownfield sites within Flood risk Zones 2 and 3 and outside of TAN15 defended zones.

A 2.12 Only sites which are considered to have tangible potential for development will be taken into account. For instance, this HPS cannot consider sites that are not readily available, unless there has been indication with landowners/developers via non-confidential pre-app and planning applications to pursue residential development on the site.

Table A2: Sources of Site Identification

Type of site	Potential data source
Land in the Local Authority's ownership and regeneration initiatives (i.e. school redevelopment)	- Consultation with Council's Property and Assets, Housing, Education and Development Management teams to determine the development potential of land within MCC's ownership.
Surplus open space/recreation land/Vacant and derelict land	- Consultation with Council's Property and MonLife regeneration/open space teams. - A desktop review using aerial mapping and photography of settlements to identify potential vacant land.
Schemes with the benefit of extant planning permission ³	- Planning application records, which have been analysed and checked for constraints, such as flood plain. This also involved consultation with the Development Management team and review of non-confidential pre-application discussions. - The previous MCC HPS carried out in 2008 by Baker associates has also been reviewed to identify sites within this study that have not yet come forward
Planning permission that are unimplemented / expired	
Planning applications that have been refused or withdrawn	
Candidate Sites that have come forward within/edge of development boundaries	- Call for Candidate Sites (July- November 2018 and July-August 2021) as well as a specific call for brownfield sites (February 2019).

Stage 3: Findings and Conclusions

A 2.13 The final stage of this study has involved an analysis of the findings to compile a list of windfall sites that have the potential to come forward for residential development (10+ dwellings) during the RLDP period. These sites are set out in table A3 below and plotted on the accompanying maps. At this stage of the RLDP process, this is a high-level list of potential windfall sites which meet the site study area and site thresholds. There

³ Sites where there is current planning permission (within 5 years) are not assessed as part of this study as they are included within the JHLAS figures.

has been no detailed analysis apart from necessary planning history search and high-level constraints investigation.

A.2.14 It is concluded that there is currently a limited supply of housing potential land opportunities for windfall sites in Monmouthshire's primary and secondary settlements. The sites identified at this current point of time indicate a capacity for approximately 215 homes, which falls short of the 450 homes windfall allowance based on past trends. This shortfall in windfall site availability is predominantly due to the rural nature of Monmouthshire where there are limited brownfield and underutilised land and building opportunities, but also other constraints the County is facing, such as the lack of a strategic solution for phosphate mitigation in the upper River Wye area of the County, thus excluding Monmouth from windfall potential. Furthermore, large areas of Severnside such as Caldicot, Magor with Undy and Rogiet fall within flood zone constraints.

A.2.15 It is acknowledged however, that as the HPS is a live document: it will be updated during the RLDP process to take account of changing site circumstances that may occur in the interim, prior to the adoption of the RLDP.

Table A3: HPS Windfall Sites

* These sites have scope to deliver more homes than the net density of 30 homes per ha as there is an existing building for subdivision

** These sites have scope to deliver more homes than the net density of 30 homes per ha as they are located within a high density town centre location

Site Ref	Settlement	Address	Site Area	Approximate no. of homes	Land type	Windfall Opportunity
Primary Settlements						
AB001	Abergavenny (inc. Llanfoist)	Land at Midway Lane	0.43ha	13	Greenfield	Paddock land. There is considered potential for residential development at this site.
AB002	Abergavenny (inc. Llanfoist)	Tudor Street Day Centre	0.2ha	10**	Brownfield	MCC social care are proposing to dispose of site. Potential for site to become available for residential development.
AB003	Abergavenny (inc. Llanfoist)	Land at Lansdown Road	0.53ha	16	Greenfield	Vacant land. There is considered potential for residential development at this site.
AB004	Abergavenny (inc. Llanfoist)	Post Office, St John's Square	0.08ha	10**	Brownfield	Post Office to vacate ground floor in near future. Potential for redevelopment of whole site to residential homes.
AB005	Abergavenny (inc. Llanfoist)	BT Exchange	0.1ha	10**	Brownfield	There is a current use, however given links to the Post Office considered to be potential for redevelopment.
AB006	Abergavenny (inc. Llanfoist)	Newbridge House, Tudor Street	0.2ha	14**	Brownfield	Recently refused planning permission for conversion to 21 homes due to loss of employment land. There is considered scope to reapply for upper floors to be converted with ground floor to remain employment use.
AB007	Abergavenny (inc. Llanfoist)	Greenfield, Merthyr Road	0.41ha	18	Brownfield	Recently refused planning application for 18 retirement apartments. Appeal dismissed due to no phosphate neutrality/betterment of the River Usk SAC. Strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area.
CA001	Caldicot (Severnside)	Jubilee Way car park	0.5ha	27**	Brownfield	MCC Pre-app proposal for 18 two-bed apartments and 9 one-bed apartments over part of the public car park.
CA002	Caldicot (Severnside)	Woodstock Way corner site behind ASDA	0.7ha	32	Brownfield	Remaining part of Caldicot school site, marketed by MCC for residential development – initial survey suggesting 32-35 homes can be accommodated.

CH001	Chepstow	Boverton House, Bulwark Road	0.3 ha	15	Brownfield	Current planning application for 6 new homes and house converted into 9 homes
CH002	Chepstow	Severn View Residential Home	0.53ha	16 **	Brownfield	Current use as a Residential Care Home. MCC social care are proposing to re-locate residents to a new residential home that will be built at the LDP allocated Crick Road site. Potential for site to become available for residential development.
CH003	Chepstow	Existing Lidl site, Bulwark	0.4ha	12**	Brownfield	Land vacated when Lidl moves to its new site opposite. Potential for residential development.
Secondary Settlements						
PE001	Penperlleni	Land off Capel Ed Lane	0.41ha	12	Greenfield	Agricultural land within the development boundary.
RA001	Raglan	Raglan Ford, High Street	0.29ha	10 **	Brownfield	Commercial and police station. There has been pre-app discussion in relation to developing this site for residential.
Total			215			

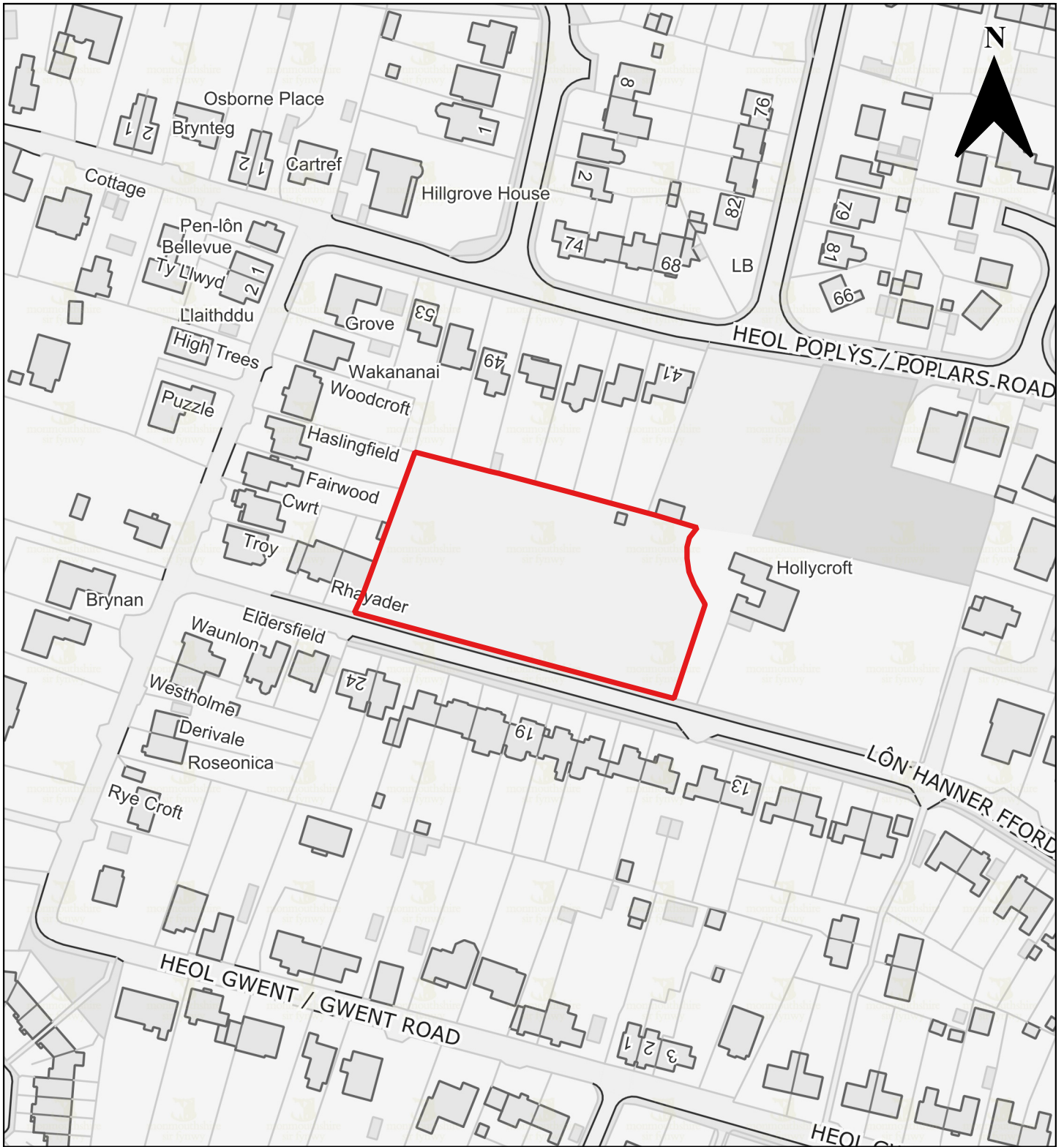
Table A4: HPS Rejected sites

Site Ref	Settlement	Address	Site Area	Approx homes	Land type	Constraint
AB008	Abergavenny	Seven Corners Lane	0.57ha	17**	Brownfield	There is a current use at the site. No indication given that it is available for development.
AB009	Abergavenny (inc. Llanfoist)	Flannel Street Carpark	0.08ha	10 **	Brownfield	Private car-park. There has been a historical pre-app for commercial ground floor and residential above, however no progress to date
AB010	Abergavenny	Robert Price Park Road	0.46ha	14**	Brownfield	There is a current use at the site. No indication given that it is available for development.


AB011	Abergavenny	Tesco Frogmore Street	0.18ha	10**	Brownfield	There is a current use at the site. No indication given that it is available for development.
CH004	Chepstow	Former Barclays Bank, Bank Street			Brownfield	Layout of building does not lend itself to residential conversion. Seller indicated that potential buyers were proposing commercial use.
MA001	Magor & Undy	Land adjacent to Wesley House, Main Road	0.64ha	19	Greenfield	Greenfield land within TAN15 Flood Zone 3.
RA002	Raglan	Land rear of Butchers	0.16ha	10*	Brownfield	No indication given that it is available for development.
RO001	Rogiet	Rogiet Hotel Station Road	0.12 ha	10 *	Brownfield	Site is within TAN15 Flood Zone 3
Excluded due to being within the upper River Wye Phosphate catchment area						
MON001	Monmouth	Rear of Market Building, Priory Street, Monmouth	0.09ha	11**	Brownfield	Links to 'Levelling Up Fund' (LUF) bid. Potential for town centre affordable housing to rear and pre-plans indicate 11 homes possible. Currently unable to proceed due to phosphates.
MON002	Monmouth	20-22 Monnow Street, Monmouth	0.1ha	10**	Brownfield	Both Listed Buildings. Potential for upper floor conversion to residential and new build to rear and link to public car parks behind Monnow Street. Previous expired planning consent.

* These sites have scope to deliver more homes than the net density of 30 homes per ha as there is an existing building for subdivision.

** These sites have scope to deliver more homes than the net density of 30 homes per ha as they are located within a high density town centre location.




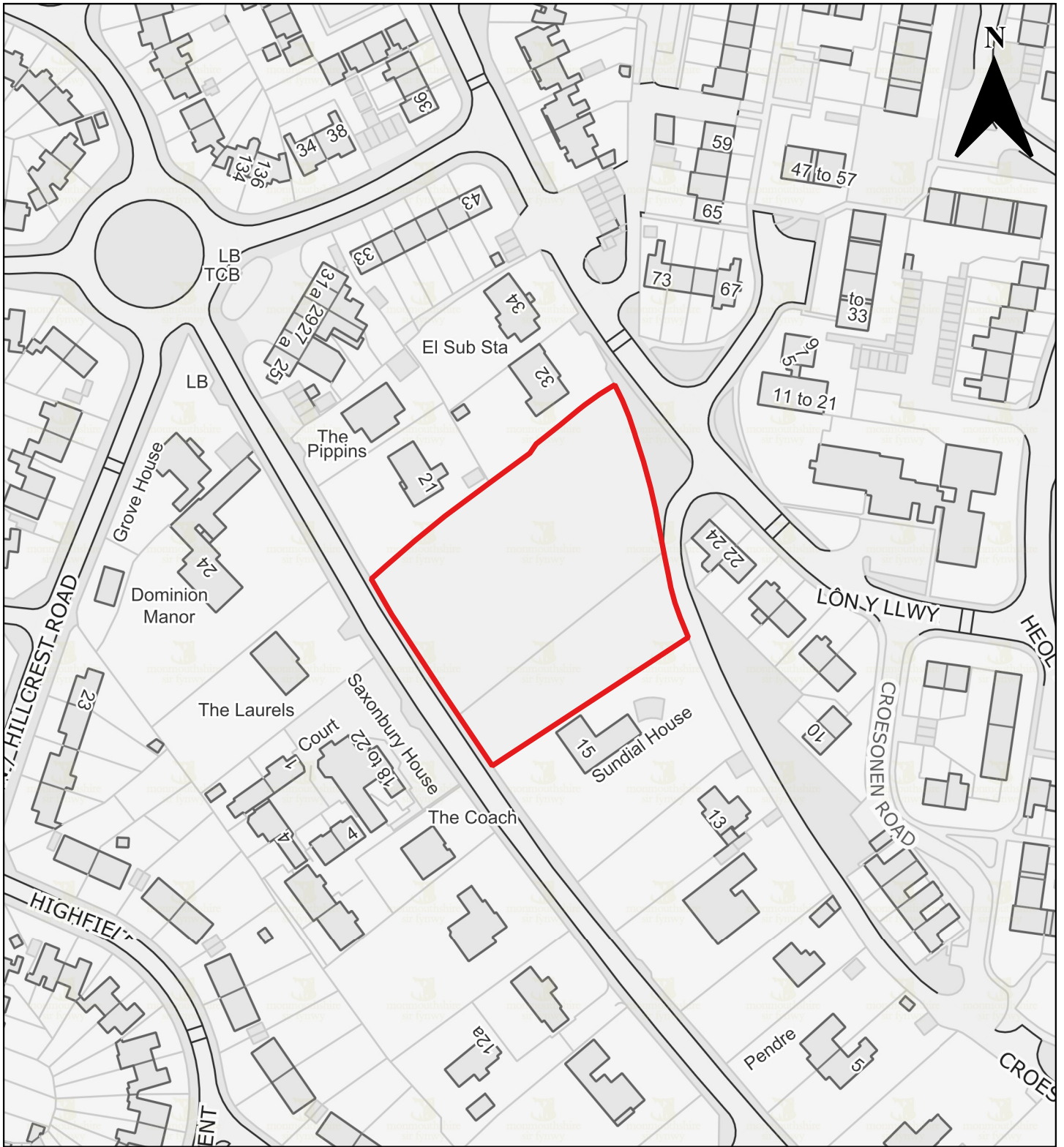
Site Reference	AB001
Address	Land at Midway Lane
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.43
Approximate Number of Homes	13
Land Type	Greenfield

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Site Reference	AB002
Address	Tudor Street Day Centre
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.2
Approximate Number of Homes	10
Land Type	Brownfield

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Site Reference	AB003
Address	Land at Lansdown Road
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.53
Approximate Number of Homes	16
Land Type	Greenfield

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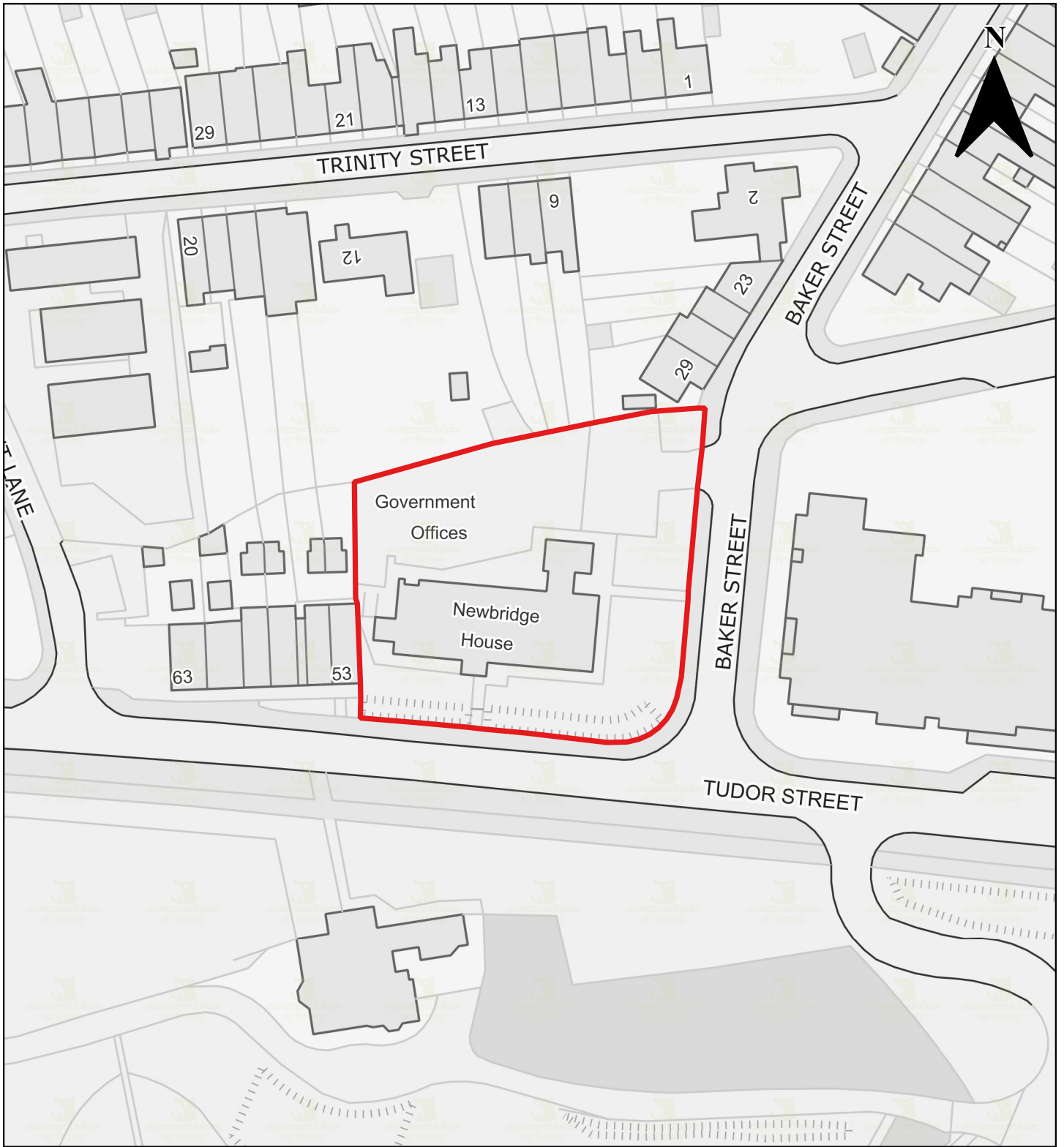
Site Reference	AB004
Address	Post Office, St John's Square
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.08
Approximate Number of Homes	10
Land Type	Brownfield

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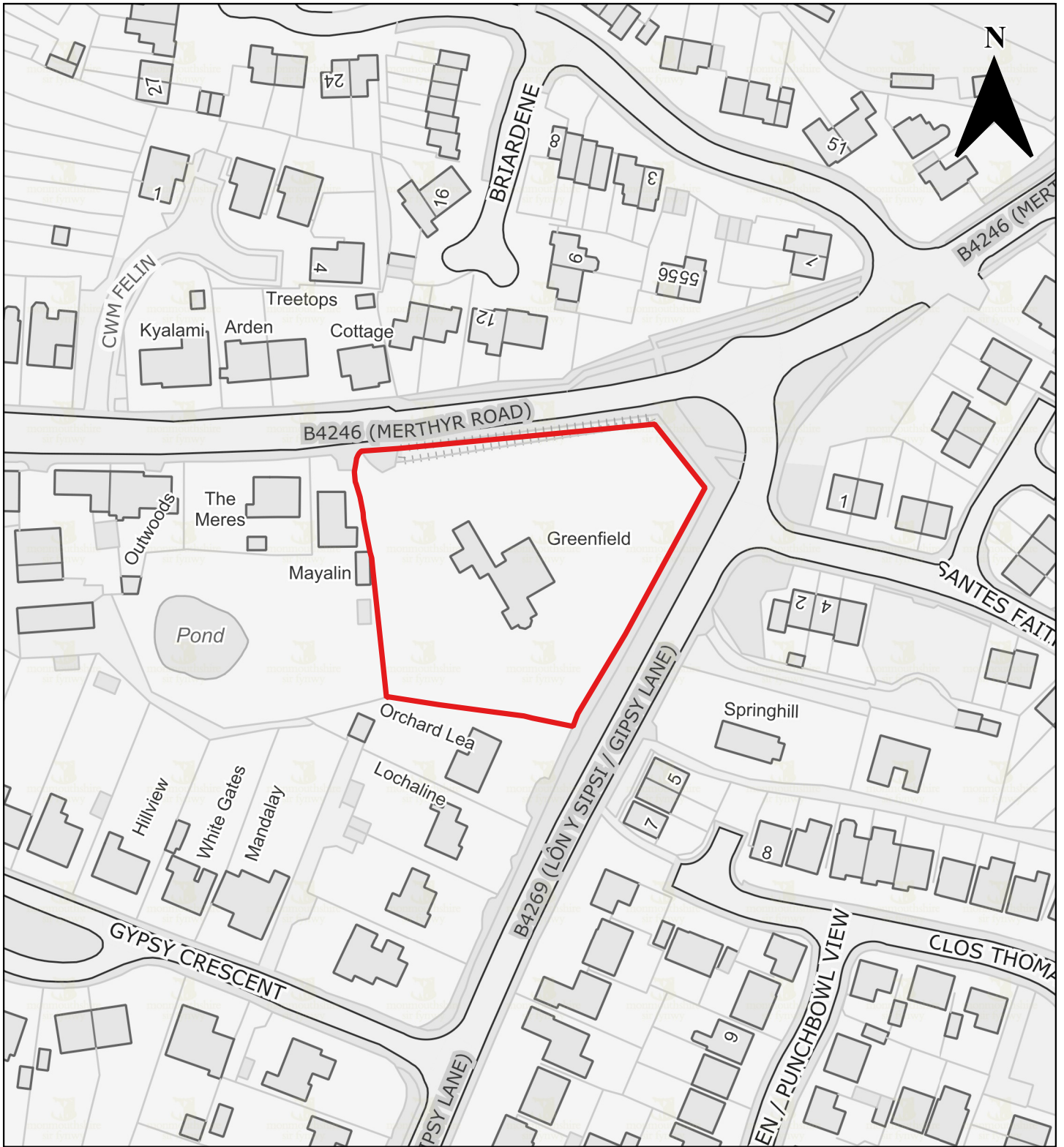
Site Reference	AB005
Address	BT Exchange
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.1
Approximate Number of Homes	10
Land Type	Brownfield

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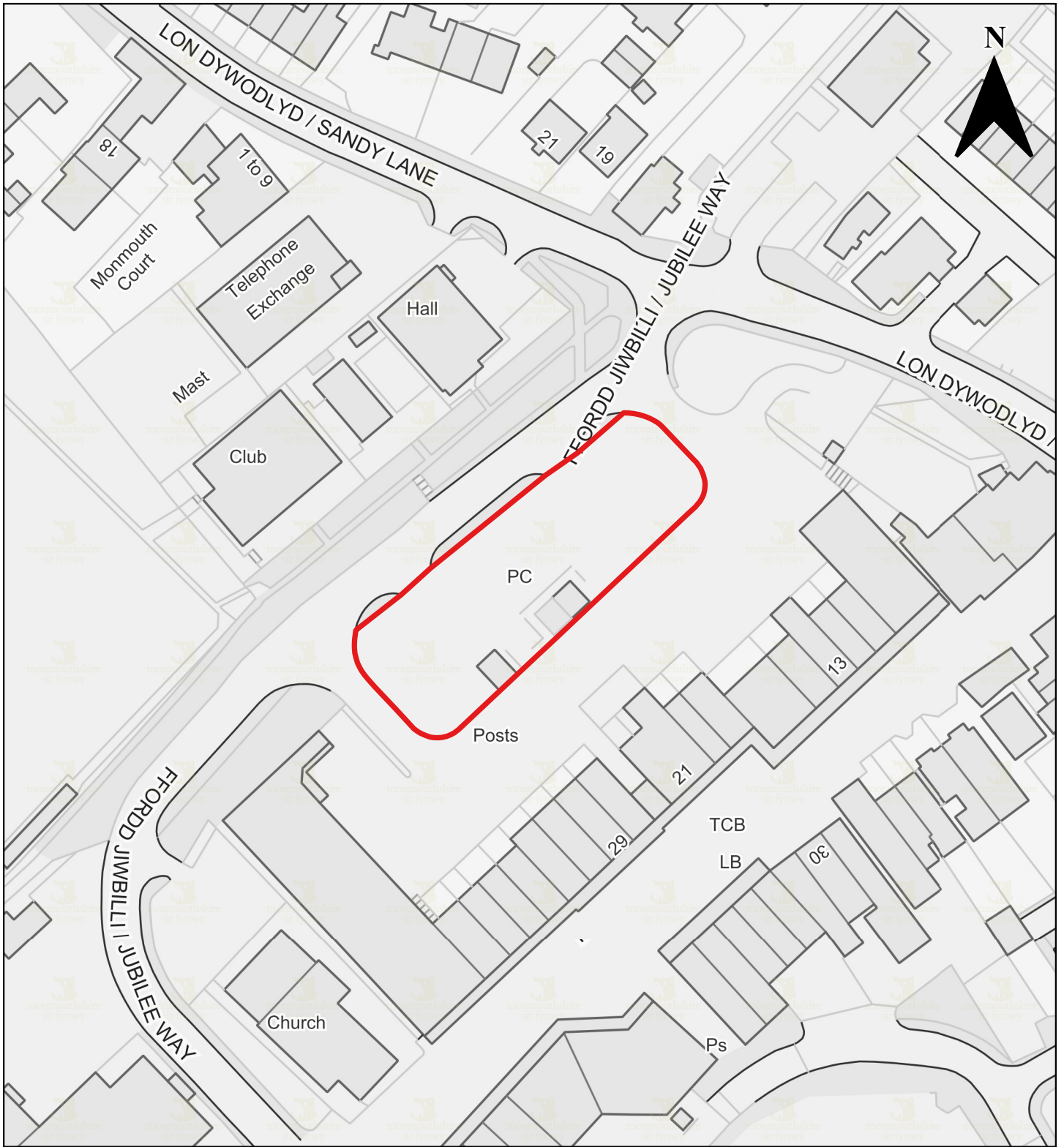
Site Reference	AB006
Address	Newbridge House, Tudor Street
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.2
Approximate Number of Homes	14
Land Type	Brownfield

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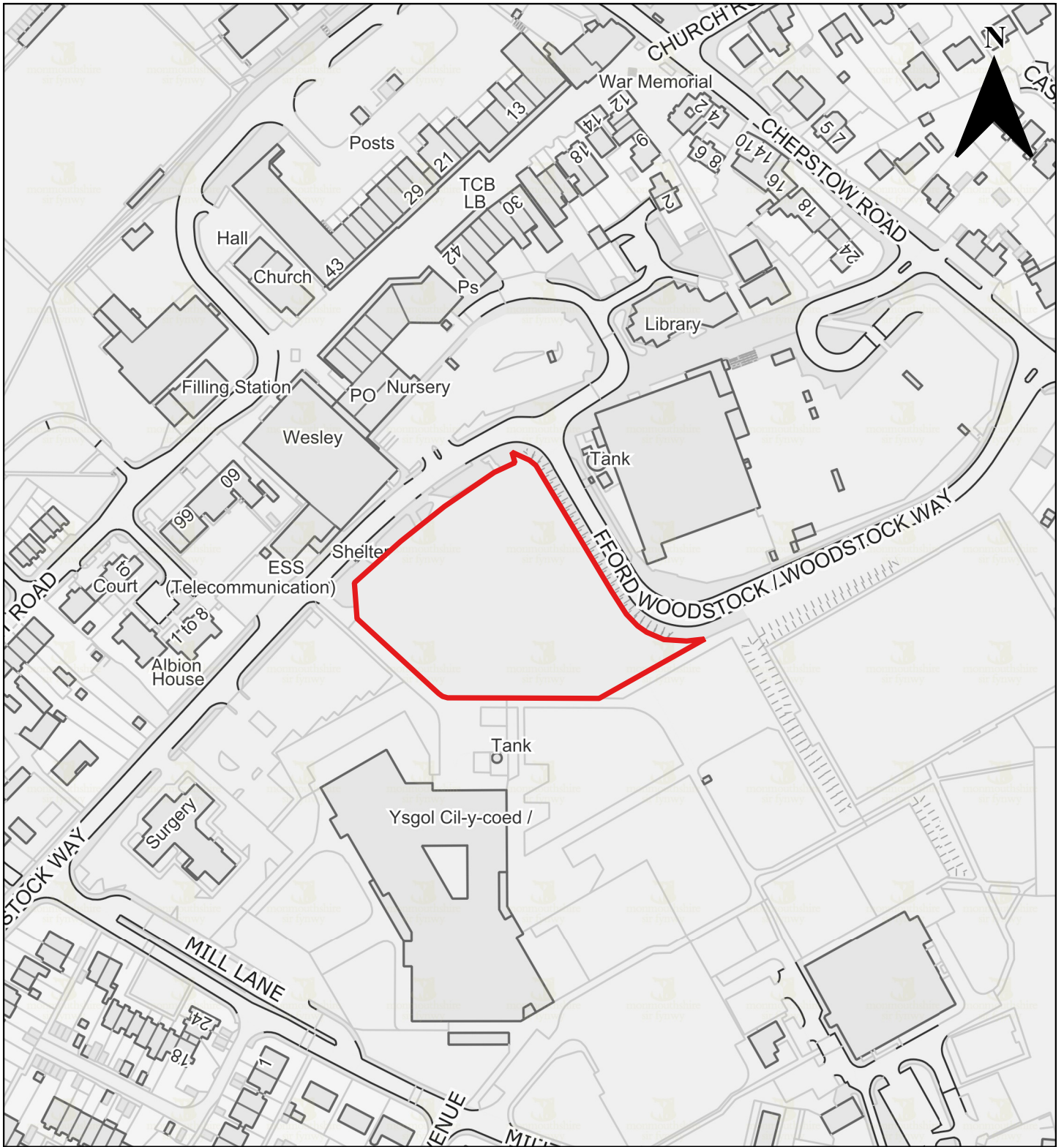
Site Reference	AB007
Address	Greenfield, Merthyr Road
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.41
Approximate Number of Homes	18
Land Type	Brownfield

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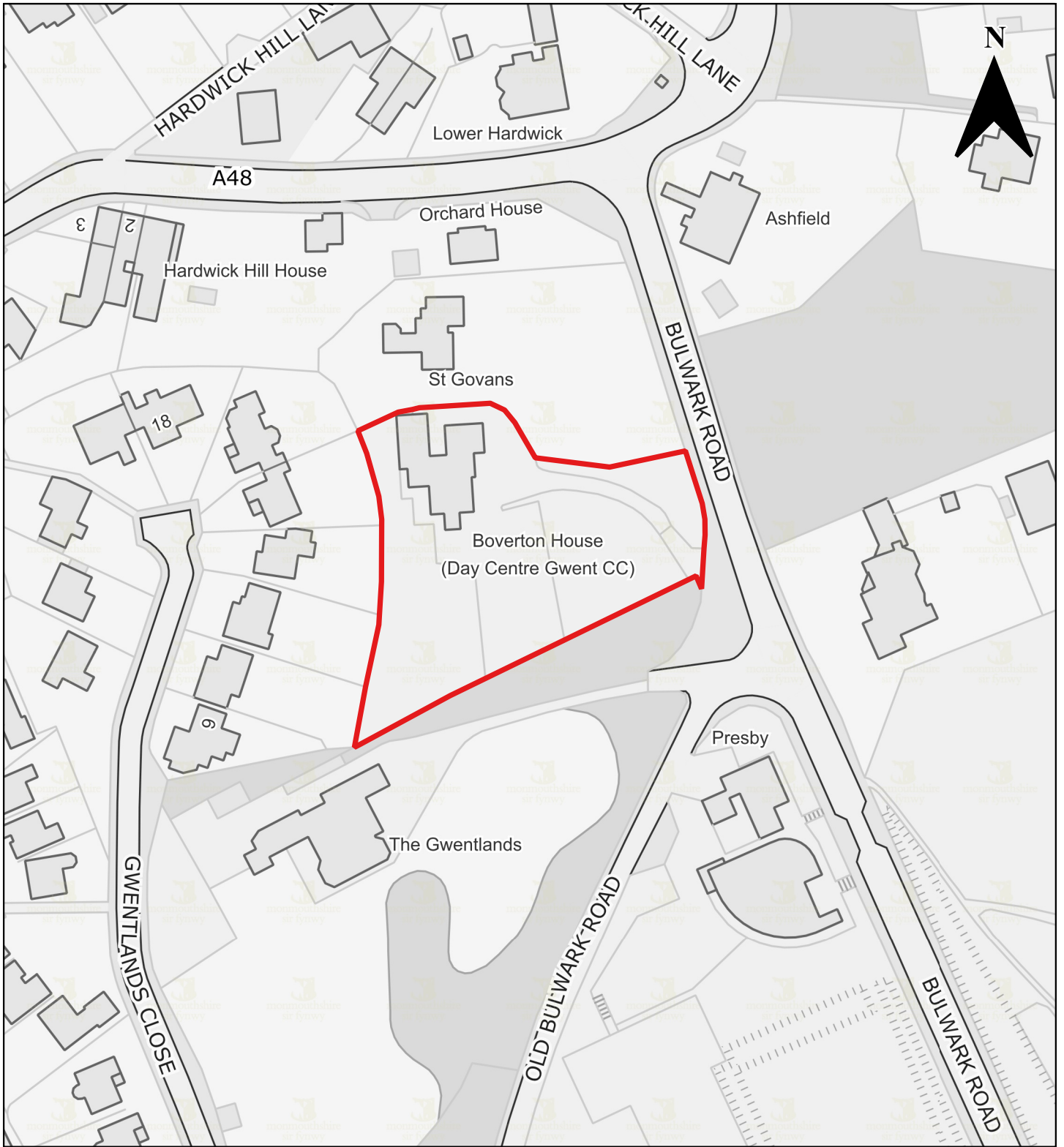
Site Reference	CA001
Address	Jubilee Way car park
Settlement	Caldicot (Sevenside)
Site Area (ha)	0.5
Approximate Number of Homes	27
Land Type	Brownfield

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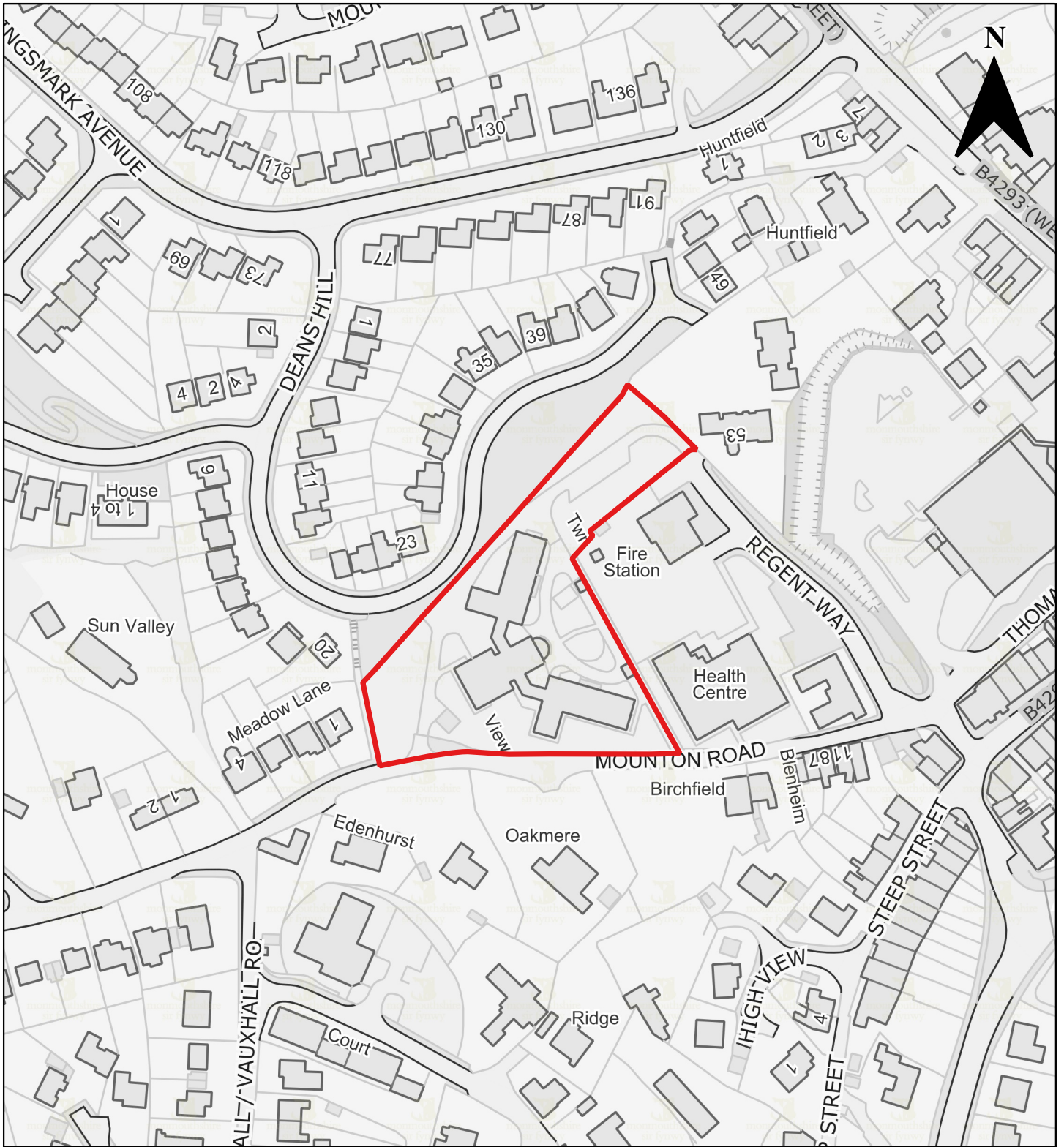
Site Reference	CA002
Address	Woodstock Way corner site behind ASDA
Settlement	Caldicot (Sevenside)
Site Area (ha)	0.7
Approximate Number of Homes	32
Land Type	Brownfield

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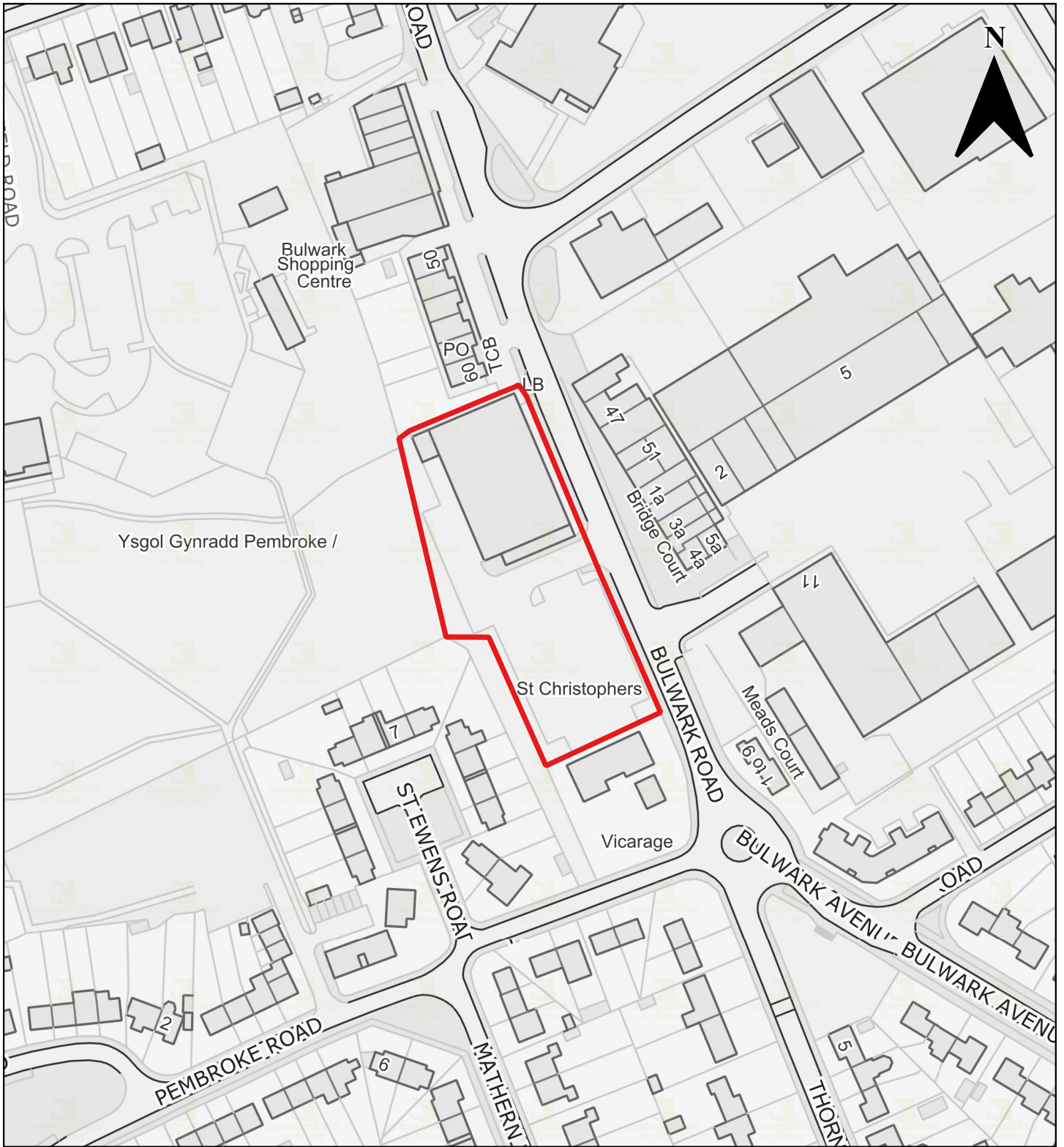
Site Reference	CH001
Address	Boverton House, Bulwark Road
Settlement	Chepstow
Site Area (ha)	0.3
Approximate Number of Homes	15
Land Type	Brownfield

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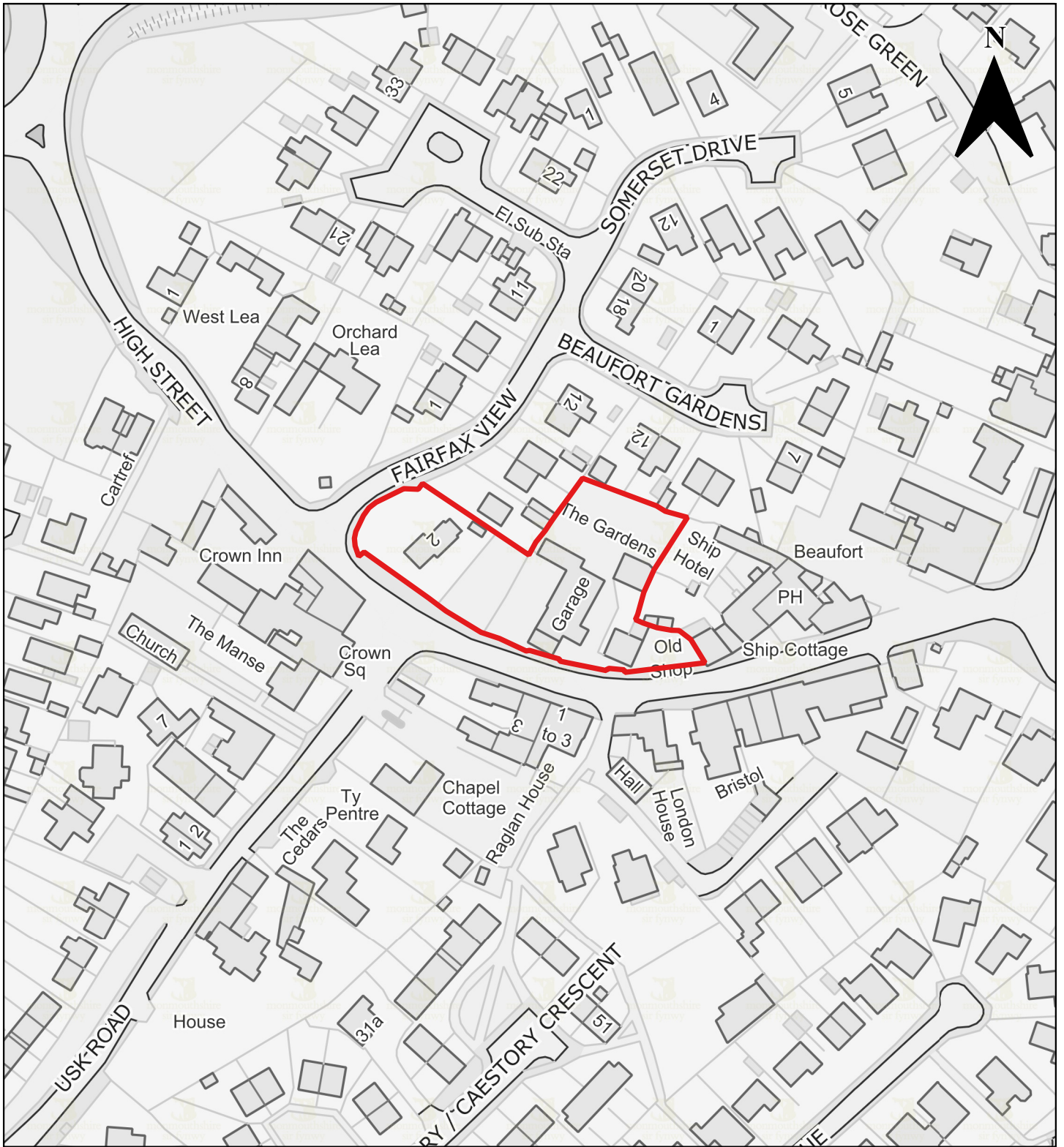
Site Reference	CH002
Address	Severn View Residential Home
Settlement	Chepstow
Site Area (ha)	0.53
Approximate Number of Homes	16
Land Type	Brownfield

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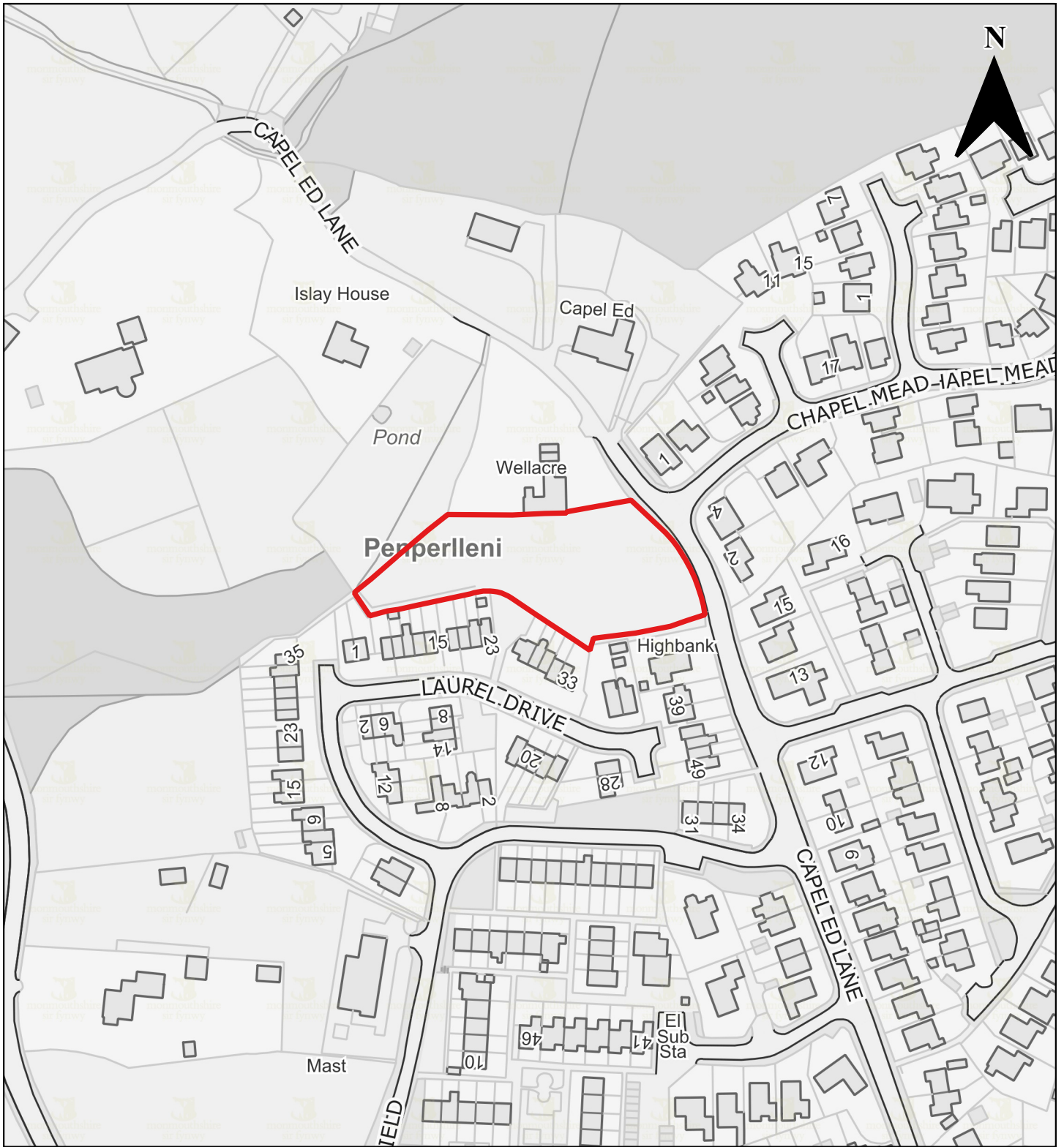
Site Reference	CH003
Address	Existing Lidl site, Bulwark
Settlement	Chepstow
Site Area (ha)	0.4
Approximate Number of Homes	12
Land Type	Brownfield

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Site Reference	RA0001
Address	Raglan Ford, High Street
Settlement	Raglan
Site Area (ha)	0.29
Approximate Number of Homes	10
Land Type	Brownfield

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Site Reference	PE0001
Address	Land off Chapel Ed Lane
Settlement	Penperlleni
Site Area (ha)	0.41
Approximate Number of Homes	12
Land Type	Greenfield

	Monmouthshire County Council, County Hall, Usk, The Rhadyr, Monmouthshire, NP15 1GA	
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Appendix 3: Minister for Housing and Local Government letter to Leaders and Chief Executives of Local Authorities (08 July 2019)

Julie James AC/AM
Y Gweinidog Tai a Llywodraeth Leol
Minister for Housing and Local Government



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: MA/P/JJ/1514/19

Leaders and Chief Executives of Local Authorities

July 2019

Dear Colleague,

At this year's RTPI Wales Planning Conference, I outlined that the Welsh Government is committed to diversifying housing supply in Wales with the need to focus attention on the delivery of social housing. This position is supported by the findings of the Independent Review of Affordable Housing Supply and the recently published estimates of housing need in Wales by tenure. I also said that, as a result, we intend updating Planning Policy Wales (PPW). This letter sets out my expectations of development plans for the delivery of social housing in advance of changes to PPW.

Good progress has been made towards delivering our target of 20,000 affordable homes, however evidence shows we need to build more social homes. We recognise the important contribution which market housing makes to providing affordable housing, but over the last 40 years house building output has only attained the levels of need when councils built and managed substantial numbers of social homes.

The published estimates of housing need in Wales by tenure provide a range of estimates based on different demographic projections for the next 5 years. The central estimate of housing need suggests an additional 4,400 market houses and 3,900 affordable homes are needed each year. In other words, 47 per cent of the homes we need in Wales should be for social or intermediate rent. Given these estimates, and based on average new house-building statistics for the past few years, it appears that we are already building the number of market homes we need, whilst we are falling short of the number of affordable homes we desperately require. The public sector must accept the challenge and step in to ensure that everyone who needs a home has a home.

One area where the prospects for social housing have been transformed is the opportunity which now exists for local authorities to build again. The Welsh Government is determined to support the building of a new generation of council homes at scale and pace to meet the needs of communities across Wales. The direct provision of social housing requires concerted effort across the public sector. There are examples of good practice emerging across Wales where local authorities have, by extending their borrowing, begun the task of

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

building new council houses. The availability of well located affordable land is critical to the success of this policy.

Up to date Local Development Plans (LDPs) are a cornerstone for housing delivery by identifying the best sites for new homes. Local planning authorities must, when complying with their statutory duty to prepare LDPs, address the need for affordable housing.

LDPs must be informed by evidence including the estimates of housing need in Wales by tenure and Local Housing Market Assessments which together identify the type and tenure of housing required. The most recent version of PPW, published last December, requires local planning authorities to follow place-making principles. Place-making is a people- centred approach to planning, designing and managing communities to promote peoples' health, happiness and well-being which must be central to preparing LDPs and deciding planning applications. PPW already allows local planning authorities to identify sites for up to 100% affordable housing. Whilst PPW also states that such sites are likely to be small in scale and number in relation to the total number of sites available, the need for social housing is now so acute that this policy needs to be implemented in a flexible way to reflect local circumstances. PPW will be updated to reflect the revised policy as part of the current review of the delivery of housing through the planning system.

When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. **Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved.** In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.

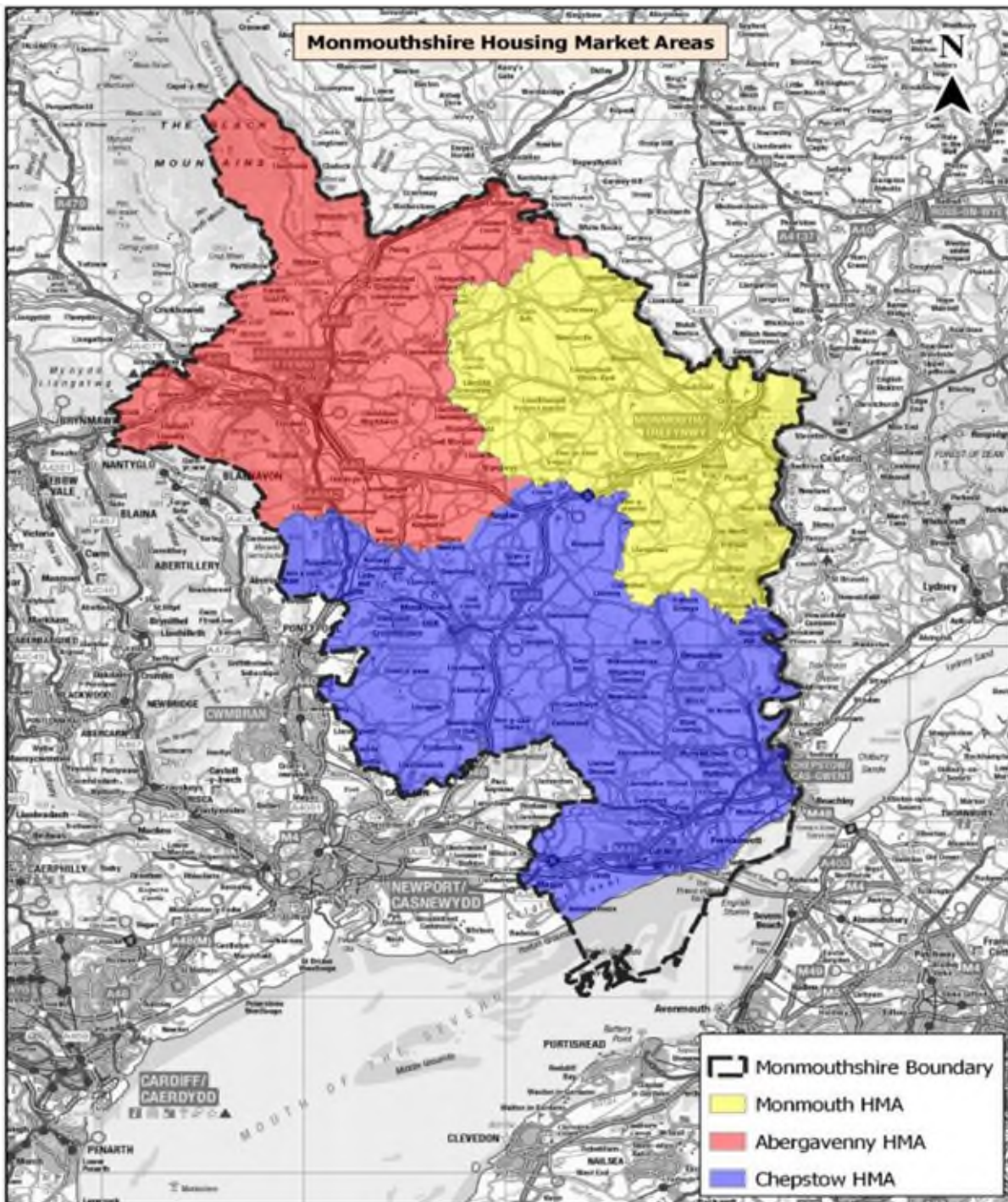
Yours sincerely,



Julie James AC/AM
Y Gweinidog Tai a Llywodraeth Leol
Minister for Housing and Local Government

CC Heads of Planning Service
Heads of Housing Service

Appendix 4: Monmouthshire Housing Market Areas



Source: Monmouthshire Local Housing Market Assessment (December 2020)

Appendix 5: Upper River Wye Catchment Area

