



Monmouthshire Replacement Local Development Plan

2018-2033

Housing Background Paper

October 2025



monmouthshire
sir fynwy

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Residential Allocations

1. Introduction

- 1.1. This paper is one of a series produced by Monmouthshire County Council (MCC) as part of the evidence base for the Replacement Local Development Plan (RLDP) which covers the period 2018 – 2033. The purpose of this paper is to provide further details in relation to the housing land supply, including completions to date, land bank commitments with planning permission, the large and small windfall site allowance and new housing allocations. It also sets out details of the housing trajectory, which is the key mechanism of demonstrating how all sites will be delivered throughout the plan period. This is an update to reflect changes to the housing figures that have been taken place since the publication of the Deposit Plan, October 2024. All housing figures have been reviewed and updated to reflect the inclusion of the 2024/25 housing monitoring data. This version forms part of the submission evidence base.

2. Policy Context

Planning Policy Wales 12 (PPW12) – February 2024

- 2.1. Planning Policy Wales 12 (PPW12) requires the RLDP to ensure that an adequate and continuing supply of deliverable housing land to meet the identified requirement throughout the plan period.

Development Plans Manual – Edition 3 (March 2020)

- 2.2. The Development Plans Manual (DPM) contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence. Guidance relating to Housing Provision and Supply Components and Preparing a Housing Trajectory is set out in Chapter 5 of the document – Preparing an LDP – Core Issues.

3. Housing Requirement and Provision Figure

- 3.1. The RLDP sets a housing requirement figure of 5,400 homes over the Plan period of 2018 – 2033. Details of the how this was arrived at are set out in the Growth and Spatial Options Background Paper. A flexibility allowance of 15% has been added to this to give an overall housing provision figure of 6,210.

Table 1: RLDP Housing Requirement and Provision Figures

Housing Requirement & Provision Figures	
Housing Requirement	5,400
Housing Provision including 15% flexibility allowance	6,210

Flexibility Allowance

- 3.2. The Development Plans Manual (Ed 3) notes that a flexibility allowance must be embedded into the plan to accommodate changing circumstances. It notes that the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. In December 2022, the Preferred Strategy (2022) was published for public consultation between the period 5th December 2022 and 30th January 2023. The Preferred Strategy included a housing requirement figure of 5,400 homes and included a flexibility allowance of 10%, caveated that this was subject to review as part of the Deposit Plan preparation. In October 2023, a report was taken to Full Council to seek Council's endorsement of a number of post-consultation updates to the Preferred Strategy. An increase in the flexibility rate from 10% to 15% was one of the updates agreed. The increase in flexibility from 10% to 15% increases the housing provision from 5,940 to 6,210 homes and resulted in an additional 270 units being added to the total figure to be provided for in the RLDP.
- 3.3. The Council report justifies the increase in the flexibility allowance on the following basis:
- It ensures the strategic sites allocated under HA1 – Land to the East of Abergavenny and HA2 – Land to the East of Caldicot/North of Portskewett, are sufficiently large to deliver the required infrastructure whilst allowing the allocation of smaller sites across the County to sustain and enhance existing communities.
 - Ensures that the Plan is more robust and resilient as there is delivery in the short-term while the large strategic sites take time to be developed out.
 - Will result in the Plan being able to provide a range and choice of sites and ensure that the Plan is not solely reliant on the delivery of larger strategic sites which are more complicated to develop.
 - A range of smaller sites will ensure the delivery of much needed affordable housing after the adoption of the Plan to start addressing current unmet affordable housing need.
- 3.4. Representations submitted at the Preferred Strategy consultation stage were largely supportive of an increase in the flexibility allowance. Further details are set out in the Initial Consultation Report, with particular reference to Policy S1.
- 3.5. Similarly, representations submitted in response to the Deposit Plan relating to the flexibility allowance are primarily supportive of an increase in the flexibility allowance to 20% or 15% representing a minimum position. However, comments were also received suggesting that it should be reduced with the starting point of 10% considered to be a maximum. For the reasons noted above, it is proposed to retain a 15% flexibility allowance. Further details of the comments raised are set out in the Consultation Report, relating to Policy S1 and the Housing Background Paper.

4. Deposit RLDP Base Date and 'Drop Dead' Date

- 4.1. Paragraph 5.62 of the Development Plans Manual notes that *"all components must have the same base date, which may require updating as the plan moves through the preparation process. LPAs should consider the relationship between the period of housing monitoring data (i.e. 31st March) and the end of the plan period (i.e. 31st December). The simplest approach is to align the plan period with the monitoring period to avoid difficulties in the phasing and housing trajectory as this may cause*

practical difficulties in the final year of phasing in the plan period. Alternatively, the last year of the trajectory could reflect 9 months of supply. This is for the LPA to consider.”

4.2. The following dates apply to the housing supply components of the Plan:

- Base Date of Deposit RLDP: 1st April 2024 – refer to the October 2024 Housing Background Paper for details.
- Base Date of Submission RLDP: 1st April 2025
- End of plan period: 31st December 2033

5. Housing Supply Components

5.1. There are several housing supply components which must be assessed in combination to inform the delivery of the housing requirement. All housing supply components in the updated submission document have the base date of 1st April 2025. The components include:

- **Dwelling Completions to date:** all residential completions since the start of the RLDP period (2018/19), split by large sites (10+ units) and small sites (under 10 units).
- **Land Bank Commitments:** number of units with planning permission on sites of 10 or more units. This includes sites with planning permission that have either commenced or that are due to commence development in the short-term.
- **Large Windfall Sites and Small Infill Sites:** windfall and infill sites are not specifically allocated for housing and come forward during the life of the Plan. Past trends of delivery and a Housing Potential Study have informed the contribution these sites make to the housing supply.
- **New Housing Allocations:** sites that have been submitted as candidate sites and have satisfied deliverability and viability requirements and the candidate site assessment process. This component also includes 3 allocations from the Adopted Local Development Plan, that have been resubmitted as a candidate site and ‘rolled forward’. All potential ‘rollover’ sites have been subjected to the same candidate site process requirements as new sites.

5.2. The timeframe applicable to each housing supply component is set out below.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15 +9mths
1 st April 2018 – 31 st March 2019	1 st April 2019 – 31 st March 2020	1 st April 2020 – 31 st March 2021	1 st April 2021 – 31 st March 2022	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025	1 st April 2025 – 31 st March 2026	1 st April 2026 – 31 st March 2027	1 st April 2027 – 31 st March 2028	1 st April 2028 – 31 st March 2029	1 st April 2029 – 31 st March 2030	1 st April 2030 – 31 st March 2031	1 st April 2031 – 31 st March 2032	1 st April 2032 – 31 st March 2033	1 st April 2033 – 31 st December 2033
Completions															
							Existing Commitments					Windfall Allowance			
							Small Infill Allowance								
								RLDP Allocations							

5.3. Each component of housing supply will now be outlined in turn.

6. Dwelling Completions

- 6.1. The RLDP requires 5,400 new homes to be delivered in the Local Planning Authority area during the plan period from 2018 – 2033. However, 2,539 units have already been delivered since 2018/19 as summarised in Table 2 for reference.

Table 2: Dwelling Completions 2018-2025

	1	2	3	4	5	6	7
	2018/19	2019/2020	2020/21	2021/22	2022/23	2023/24	2024/25
	1 st April 2018 – 31 st March 2019	1 st April 2019 – 31 st March 2020	1 st April 2020 – 31 st March 2021	1 st April 2021 – 31 st March 2022	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025
Large Site Completions	359	252	338	316	282	240	258
Small Site Completions	84	104	81	45	61	58	61
Total Completions per annum	443	356	419	361	343	298	319
Total Dwelling Completions 2018-2024: 2,539 units							

7. Land Bank Commitments (sites with planning permission)

- 7.1. Sites that already have planning permission form another significant component of supply, including developments that are already under construction. The starting point for this component of housing supply is the 2025 housing schedule, which is the most recent site schedule for the annual monitoring of housing land and lists all sites with planning permission in the LPA area. Sites of 10 units or over that are being progressed, or are due to commence, and there is therefore confidence that they will come forward over the course of the RLDP period have been included in the 'commitments' component of the supply. A spatial summary of this supply is provided in Table 3, with the full list of sites set out in Table 4 for reference.

Table 3: Spatial Summary of Land Bank Commitments (sites with planning permission 1st April 2025)

Settlements	Homes not yet completed on sites with planning permission (1 st April 2025)
Abergavenny (including Llanfoist)	17
Chepstow	61
Monmouth (including Wyesham)	70
Caldicot (including Severnside settlements)	401
Raglan	38
Rural Settlements	14
Total Existing Commitments	601

Table 4: Existing Commitments by Site

Settlement	Site Name	Homes contributing to land supply on sites with planning permission (1 st April 2025)
Abergavenny (including Llanfoist)	Grove Farm, Llanfoist	17
Chepstow	Fairfield Mabey (former commercial land)	46
	Boverton House Day Centre	15
Monmouth (including Wyesham)	Land west of Rockfield Road	70
	Land to North of Caldicot School, Caldicot	46

Caldicot (including the Severnside Settlements)	Crick Road, Portskewett	182
	Land at Vinegar Hill, Undy	53
	Rockfield Farm, Undy	120
Raglan	Land at Chepstow Road, Raglan	38
Rural Settlements	Land adj. Clearview Court, Shirenewton (SAH11(xiv(a)))	11
	Cross Ash Garage (SAH11(i)(b))	3
Total Existing Commitments		601

Non-Delivery Allowance

- 7.2. The DPM notes that including the entire land bank in numerical terms in the housing supply 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 DPM advises that factoring in a non-delivery allowance can help avoid any such shortfall from this element of supply.
- 7.3. A land bank non-delivery allowance is applied only to the commitments 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. Given the relatively small number of sites involved and based on Officer knowledge of sites, it has been decided to discount 7 sites where it is considered there is insufficient information to demonstrate that they will come forward during the Plan period.
- 7.4. It is proposed to exclude the sites listed in Table 5 from the housing land supply and therefore these sites are not included within the 601 homes in the existing commitments component.

Table 5: Excluded Land Bank Commitments

Site	Reference	Number of homes Remaining
Mulberry House, Pen-y-Pound, Abergavenny	DC/2014/01015	20

Larchfield, Old Monmouth Road, Abergavenny	M10051	5
Osborn International, Lower Church Street, Chepstow	DM/2022/01089	92
Green Farm, Caldicot Road, Rogiet	DM/2021/01198	10
Llanellen Court, Llanellen	DC/2015/00474 & DC/2017/00497	14
Land south west of Penallt (SAH11(xii))	DC/2015/00606	10
Land north of Llanvair Kilgeddin (SAH11(x))	DM/2018/02001	5

8. Large Windfall and Small Infill Allowances

Large Windfall Allowance

- 8.1. Large windfall sites are sites with a capacity of 10 or more homes that are not specifically allocated for housing yet come forward during the Plan period. 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 Adopted LDP policies in recent years and what might potentially come forward in the future. Two calculation methods have been explored to inform the windfall allowance:

- Past windfall completion rates- extrapolating average windfall rates.
- Housing Potential Study

Past Windfall Completion Rates

- 8.2. Given the nature of windfall sites, it is considered most realistic to monitor the number of units completed annually, rather than permissions, to inform the likely contribution windfall sites may make to the land supply. Table 6 provides an overview of windfall site completions over the past 10 years.

Table 6: Windfall Site Completions

Year	Windfall Site Completions (10+ units)	Percentage of Total Completions
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%
2022/23	71	21%
2023/24	89	30%
2024/25	52	16%

Table 7: Windfall Averages

5 Year Average	10 Year Average
83 homes	86 homes

- 8.3. Windfall site completions have varied over the past 10 years (2015 – 2025); ranging from 0 to 135 homes per annum or an overall annual average of 86 homes.
- 8.4. 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. The 2019/20 monitoring period recorded no windfall completions, whilst the two years to 2017 and 2020/21 saw high completion rates. If these abnormal years are excluded from the future extrapolation rate, this gives an annual average completion rate of 80 homes. Further details are set out in Table 8 and 9.

Table 8: Adjusted Windfall Allowance to Exclude Abnormal Years

Year	Windfall Site Completions (10+ units)	Abnormal Adjustment (highlighted years excluded)
2015/16	135	0

2016/17	128	0
2017/18	107	107
2018/19	80	80
2019/20	0	0
2020/21	121	0
2021/22	80	80
2022/23	71	71
2023/24	89	89
2024/25	52	52

Table 9: Adjusted Average Windfall Allowance

Adjusted Windfall Average to Exclude Abnormal Years
Adjusted average annual windfall rate of 80 homes

- 8.5. There are 8.75 years remaining of the RLDP (1st April 2025 – 31st December 2033), however, to avoid any double counting, as windfall sites with a current permission are already included within the existing commitments, the first five 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 housing land supply as the adjusted average noted in Table 9 to the remaining 3.75 years of the Plan period, this produces a projected windfall allowance of 300 homes (80 homes per annum x 3.75 years based on the adjusted average noted in Table 9).

Housing Potential Study

- 8.6. In order to identify where these windfall sites could potentially come from a Housing Potential Study (HPS) has been undertaken. The study has looked at the availability of land and under used buildings within the primary and secondary settlements of Monmouthshire, including possible regeneration schemes and empty homes and upper floors within town centres which have the potential to provide additional homes. The HPS is attached at Appendix 1.
- 8.7. The HPS has identified a limited range of windfall opportunities in our primary and secondary settlements that equate to around 200 homes. This provides an average

of 53 homes per annum over the last 3 years and 9 months of the Plan period (see paragraph 8.5), which is lower than the adjusted average annual windfall rate of 80 homes.

Preferred Windfall Allowance

- 8.8. There have been certain contextual changes in recent years which may impact on the level of windfalls the County might see over the remaining years of the Plan.
- Plan-led system: 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. This also involved the revocation of Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (January 2015) in its entirety.
 - ‘Unallocated Sites’ Policy: Monmouthshire County Council introduced an ‘unallocated sites’ policy in response to the revocation of TAN1 as a means of addressing our housing land supply shortfall. This set 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. A Welsh Government clarification letter on this policy position meant the ‘unallocated sites’ policy ceased to be used. However, whilst in place, three sites gained planning permission, totalling 306 homes. Two of the sites are under construction and will have contributed to the windfall rates achieved in recent years.
 - Phosphates: in January 2021, NRW introduced tighter water quality measures, which impacted on planning permissions being approved in the River Usk and River Wye Catchment areas, which combined cover a large area of Monmouthshire. A solution is now programmed within the Plan period, however, the measures introduced in 2021 have 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.
- 8.9. These contextual changes can influence the windfall rates, some increasing and others reducing it, highlighting the level of uncertainty associated with this component of the housing supply. Therefore, to avoid overestimating the windfall element of the RLDP housing supply, the Housing Potential Study has been used as a basis for the Deposit RLDP, contributing to 200 homes to the supply.

Small Infill Allowance

- 8.10. 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 factored into the housing supply for small site completions that are likely to be delivered over the Plan period based on an assessment of past trends. Table 10 outlines the number of small site completions over the past 10 years.

Table 10: Small Site Completions

Year	Small Site Completions (<10 homes)	Percentage of Total Completions
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%
2022/23	61	18%
2023/24	58	19%
2024/25	61	19%

Table 11: Average Small Site Completions

5 Year Average	10 Year Average
61 homes	75 homes

- 8.11. Small site completions have remained fairly consistent for most of the past 10 years; however, a reduction is notable in the last four years. This could, in part, be as a result of the water quality measures put in place by NRW to address phosphates levels in the River Usk and River Wye Catchment areas and the impact on planning permissions being approved during that period. This trend is expected to continue in the short term as delayed planning applications make their way through the system.
- 8.12. It is standard practice to base an initial calculation for small site completions allowance on a ten-year average. The 10-year average of 75 homes per annum gives projected small site allowance of 656 homes over the remaining 8 years and 9 months of the RLDP period. The full years of the remaining Plan period need to be

considered as small sites are not included within the existing commitments detailed in Table 4.

Adjusted Small Infill Allowance

- 8.13. Whilst there are still opportunities for small site development within our settlements, it is considered that these opportunities are becoming more limited. The Plan-led system, phosphates related measures and limited brownfield opportunities in the County and many development opportunities already taken, are considered to impact on the level of infill opportunities going forward. This is reflected in the level of small site completions recorded for the last three monitoring periods. It is, therefore, proposed to discount the small infill allowance by 15% to represent a more realistic completion rate.
- 8.14. As noted in paragraph 8.12, the 10 year-year average of 75 homes per annum gives a projected small site allowance of 656 homes for the remaining Plan period. A 15% reduction results in an overall small site allowance of 558 homes for the remaining Plan period.

Table 12: Adjusted Small Infill Allowance

Adjusted Small Infill Allowance	Allowance
Adjusted small infill allowance including 15% discount	558 homes

9. Local Development Plan ‘Rollover’ Sites

- 9.1. The Development Plans Manual also allows for the allocation of sites rolled forward from a previous plan into the RLDP, subject to careful justification. There are three Adopted LDP allocations that are considered appropriate for inclusion in the RLDP as ‘rollover’ sites, accounting for 175 homes. These are discussed further in Table 13.

Table 13: ‘Rollover’ Allocations

Rollover Allocation – Adopted LDP Ref	Allocated in LDP	Allocated as RLDP Rollover Allocation	Notes
SAH4 Wonastow Road, Monmouth	110	110	Remaining area of the Wonastow Road site, allocated for residential use under Policy HA7 – Land at Drewen Farm, Monmouth. Planning application DM/2024/01295 for 110 houses submitted October 2024, pending consideration.

SAH8 Tudor Road, Monmouth	35	50	Planning application DM/2024/00557 for 50 affordable dwellings approved 26 th March 2025.
SAH11(v) Land north of Little Mill	15	15	Planning application DM/2020/01438 for 9 affordable homes and 6 open market homes approved 17 th September 2024.
Total 'Rollover' Allocations		175	

10. RLDP Allocations

- 10.1. The remaining component of housing supply stems from new housing allocations, which are detailed in Table 14, including the three LDP 'roll-over' sites noted above.

Table 14: RLDP Residential Site Allocations

HA1- HA18 – Residential Site Allocations					
In order to deliver the housing requirement identified in Policy S1, the following sites are allocated for residential development in the period up to 2033:					
Site Ref	Site Name	Settlement	Site Area (ha)	Total Homes in Plan Period	Total Affordable Homes in Plan Period
Strategic Sites (Tier 1 Settlements)					
HA1	Land to the East of Abergavenny	Abergavenny	35.9	500	250
HA2	Land to the East of Caldicot/North of Portskewett	Caldicot	64	770	385

HA3	Land at Mounton Road	Chepstow	12.8	146	73
HA4	Land at Leasbrook	Monmouth	11	270	135
Primary Settlements/Severnside (Tier 1 Settlements)					
HA5	Land at Penlanlas	Abergavenny	6.17	100	50
HA6	Land at Rockfield	Monmouth	1.5	60	30
HA7	Land at Drewen Farm	Monmouth	6.6	110	55
HA8	Tudor Road, Wyesham	Monmouth	2.1	50	25
HA9	Land at Former MOD	Caerwent	4.2	40	20
Secondary Settlements (Tier 2 Settlements)					
HA10	South of Monmouth Road	Raglan	4.5	54	27
HA11	Land East of Burrium Gate	Usk	2.6	40	20
HA12	Land West of Trem yr Ysgol	Penperlleni	3.4	42	21
Main Rural Settlements (Tier 3 Settlements)					

HA13	Land adjacent to Piercefield Public House	St Arvans	1.1	16	8
HA14	Land at Churchfields	Devauden	1	20	10
HA15	Land East of Little Mill	Little Mill	1.68	20	10
HA16	Land North of Little Mill	Little Mill	0.87	15	8
HA17	Land adjacent to Llanellen Court Farm	Llanellen	1.56	26	13
HA18	Land West of Redd Landes	Shirenewton	1.76	26	13
Total Units				2,305	1,153

11. Summary of Housing Supply

- 11.1. Table 15 summarises the different housing supply elements and how the housing provision figure of 6,210 is reached. The spatial distribution of the 6,210 homes is set out in Table 16.

Table 15: Summary of Housing Supply Components

Housing Supply Component	Number of Homes	Notes
Housing Provision	6,210	RLDP Housing Requirement – 5,400 +15% flexibility allowance. Please note that due to a further monitoring update to reflect the 2024/25 monitoring period, the housing provision figure provided for is 6,203.
Less Commitments		

2018 – 25	2,539	Comprises 2,045 homes on large sites and 494 homes on small sites.
Existing Land Supply Commitments	601	Sites have only been included if construction is already underway or they have planning permission as at 01/04/2025 and they are expected to come forward during the Plan period.
Less Allowances		
Windfall Allowance (>10)	200	The windfall allowance is based on the number of homes estimated to be achievable on sites included within the Housing Potential Study. An allowance of 200 homes is included. Windfall completions for the first 7 years of the plan are included within the overall completions (2018-2025). Windfalls with current permissions are included in the existing commitments. To avoid double counting the first 5 years of the remaining plan period are excluded from the calculations (2025-2030)
Small Site Allowance (<10)	558	A 15% reduction has been applied to the 10-year average for the remaining Plan period to reflect considerations including a reduction in the trend in recent years, fewer infill/conversion opportunities and the impact phosphate mitigation measures have had on planning applications.
Allocations		
LDP Rollover Allocations	175	Rollover Allocations are Adopted LDP large sites where there is evidence to demonstrate deliverability. Three sites make up the 'rollover' allocations component.
New Allocations	2,130	New allocations identified in the RLDP.
Total Allocations Provision	2,305	Rollover Allocations and New RLDP Allocations.

Table 16: Spatial Distribution of Housing Supply

Settlement	Total Commitments		RLDP Growth Strategy			Total Housing Provision 2018-2033*
	Completions 2018-2025	Existing Commitments	Total Allowances (Small Sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocations	
Abergavenny (incl. Llanfoist)	552	17	184	0	600	1,353
Chepstow	535	61	126	0	146	868
Monmouth (incl. Wyesham)	291	70	62	160	330	913
Caldicot (incl. Severnside)	827	401	123	0	810	2,161
Secondary Settlements	113	38	60	0	136	347
Rural Settlements	221	14	203	15	108	561
Total	2,539	601	758	175	2,130	6,203

12. Housing Stakeholder Group

- 12.1. In accordance with the Development Plans Manual (DPM) a meeting was arranged with a Housing Stakeholder Group prior to the publication of the Deposit Plan to discuss three elements of the housing supply: completions to date and trajectories for existing commitments and new allocations. A record of the meeting is attached at Appendix 2. In summary, consensus was reached on past completions and existing and new allocation delivery rates with the exception of HA1 – Land to the East of Abergavenny and HA2- Land to the East of Caldicot/North of Portskewett. Details of the comments raised can be found in Appendix 2 of this paper and the housing trajectories published at Deposit Stage can be viewed in Appendix 9 of the Deposit RLDP. Updated trajectories to reflect changes in completion figures for the 2024/25 monitoring period can be viewed in Appendix 9 of the Submission version of the RLDP.

13. Affordable Housing Provision

- 13.1. The background details to the RLDP's approach to affordable housing is set out in Section 13 of the Deposit Plan, however, for completeness this background paper

provides details of the sources of affordable housing arising from the different housing supply components.

Table 17: Affordable Housing Supply Components

Sources of Affordable Housing	No. of Affordable Homes
Completions Affordable homes secured on completions delivered between 2018 – 2025.	521
Existing Commitments Affordable homes secured on existing commitments based on the current Adopted LDP affordable housing percentage thresholds, that are still to be delivered.	269
Allowances There are no affordable homes factored in for small sites of 1-4 homes. Sites of 5-9 homes are calculated on a 40% basis and windfall sites of 10 homes, or more are calculated on a 40% or 50% threshold depending on the size of the site identified in the Housing Potential Study consistent with the affordable housing policy set out in the Deposit Plan.	118
RLDP Housing Allocations Affordable homes to be sought on new housing allocations at a rate of 50%. The range takes account of the 15% flexibility allowance that is built into the housing figures.	758 – 1,165
Total Affordable Housing Provision	1,666 – 2,073

- 13.2. The affordable housing figure arising from the different housing supply components forms the basis of the affordable housing target set out in Strategic Policy S7 – Affordable Housing. Following the update of the data following the 2024/25 housing monitoring period, the figures set out in Table 17 above, are marginally different to

the target included in Policy S7, and it is therefore not considered necessary to amend the policy target at this time.

- 13.3. Spatially, the affordable housing provision estimated to meet the overall housing provision figure of 6,210 is set out in Table 18.

Table 18: Spatial Distribution of Affordable Housing Provision

Settlement	Total Commitments		Deposit Plan			
	Completions 2018-2025	Existing Commit- ments	Total Allowances (Small Sites; Windfalls)	LDP Rollover Allocations	RLDP New Housing Allocation s to meet housing provision of 6,210	Total Housing Provision 2018-2033
Abergavenny (incl. Llanfoist)	119	17	52	0	300	488
Chepstow	77	46	26	0	73	222
Monmouth (incl. Wyesham)	87	25	4	89	165	370
Caldicot (incl. Severnside)	170	164	21	0	405	760
Secondary Settlements	26	13	13	0	68	120
Rural Settlements	42	4	2	9	54	111
Total	521	269	118	98	1,065	2,071

Appendix 1 – Housing Potential Study

Housing Potential Study

- 13.4. The purpose of the Housing Potential Study (HPS) is to sit alongside the Housing background paper to set out where windfall allowances (sites of 10 or more dwellings) could potentially come from within the County. The HPS has looked at the availability of land and under used buildings within the primary and secondary settlements of Monmouthshire, including possible regeneration schemes and empty homes and upper floors within town centres which have the potential to provide additional homes.
- 13.5. The base date for study is in line with the latest period of housing monitoring data, meaning that the study reflects the position of potential windfall sites from the 1st April 2025. Any changes to planning status of a site post 1st April 2025 are not reflected in the study. The HPS is however a live document and following the next housing monitoring review (period up to 1st April 2026) the study will be updated.
- 13.6. In order to establish potential windfall sites for residential development the study involved
- 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

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 has assisted in identifying which of the County's settlements are the most sustainable and have capacity to accommodate and deliver further growth. The HPS reviews potential windfall sites within the top two settlement tiers of the hierarchy, which include:

Primary Settlements – Abergavenny with Llanfoist, Chepstow, Monmouth with Wyesham, Caldicot including the Severnside settlements of: Caerwent, Crick, Magor Undy, Portskewett, Sudbrook, Rogiet

Rural Secondary Settlements – Penperlleni, Raglan, Usk

- 13.7. In terms of the site threshold, this HPS has considered sites that are capable of accommodating a capacity of 10 or more residential units. This is in line with long standing monitoring practices whereby sites of 10 units or more are classified as windfall sites. The calculation for the number of units a site is able to accommodate is based on the net density of 30 dwellings per hectare.

Stage 2: Identifying Sources of Supply

- 13.8. Stage 2 of the methodology involves the identification of potential housing sites that are capable of accommodating 10 or more dwellings. This has been undertaken in a variety of ways, including:

- Call for Candidate Sites (July – November 2018) and (July- September 2021).
 - A specific call for Brownfield sites in February 2019 inviting such sites to come forward.
 - Planning Policy Officers actively identifying potential vacant/surplus sites through desktop research, site visits and consultation with Council staff.
 - Checking planning applications that have been refused/withdrawn/have extant consent.
- 13.9. Potential sites identified at this stage have only been subject to a high-level assessment to identify any insurmountable constraints to development, such as flood risk areas¹.
- 13.10. Only sites which are considered to have tangible potential for development have been taken into account. For instance, this HPS does not consider sites that are not readily available, unless there has been an indication with landowners/developers via pre-app and planning applications to pursue residential development on the site.

Stage 3: Findings and Conclusions

- 13.11. The final stage of this study has involved an analysis of the findings to compile a list of potential 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 1 below and plotted on the accompanying maps. This is a high-level list of potential windfall sites which meet the site study area and site thresholds as of 1st April 2025. There has been no detailed analysis apart from necessary planning history search and high-level constraints investigation.
- 13.12. It is concluded that there is currently a limited supply of windfall land opportunities. This limited supply of windfall availability is predominantly due to the rural nature of Monmouthshire where there are limited brownfield and underutilised land and building opportunities.

¹ Flood Risk has been assessed with regard to the Flood Map for Planning.

Site Ref	Settlement	Location	Site Area	Approximate No. of homes	Land type	Windfall Opportunity
Primary Settlements						
AB01	Abergavenny (inc. Llanfoist)	Land at Midway Lane	0.43ha	13	Greenfield	Private paddock land. There is potential for residential development at this site.
AB02	Abergavenny (inc. Llanfoist)	Land at Lansdown Road	0.53ha	16	Greenfield	Private paddock land. There is potential for residential development at this site
AB03	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 site to residential
AB04	Abergavenny (inc. Llanfoist)	BT Exchange	0.1ha	10	Brownfield	There is a current use at the site however, given links to the Post Office there is considered to be potential for redevelopment.
AB05	Abergavenny (inc. Llanfoist)	Newbridge House, Tudor Street	0.2ha	14	Brownfield	Previously refused planning permission for conversion to 21 homes due to loss of employment land. There is considered to be scope for the conversion of the upper floors to residential use with ground floor to remain in employment use.

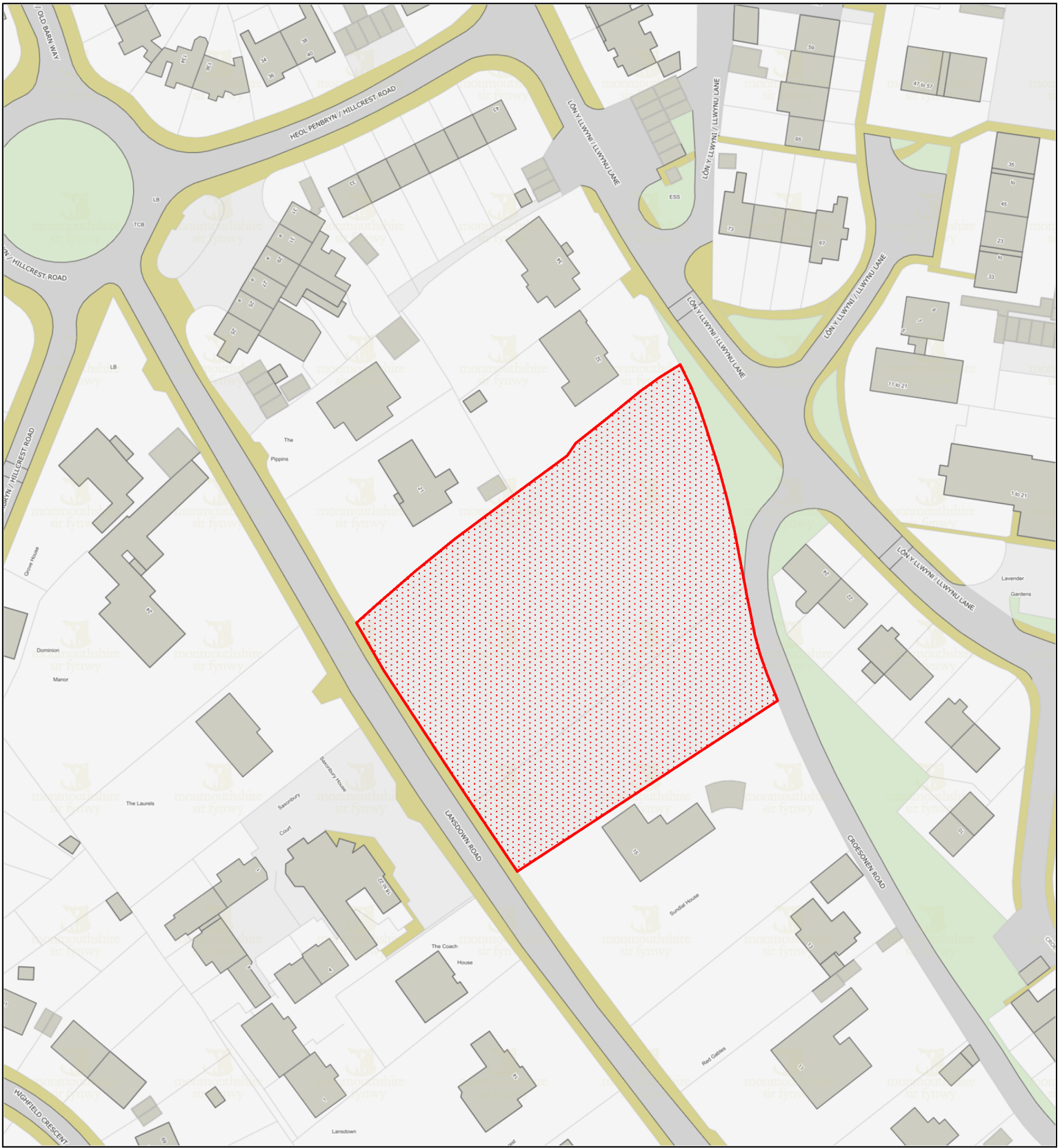
AB06	Abergavenny (inc. Llanfoist)	Greenfield, Merthyr Road	0.41ha	18	Brownfield	Previously refused planning permission for 18 retirement apartments. Appeal dismissed due to phosphate issues associated with the River Usk SAC. Strategic solutions are being developed to enable the treatment of phosphates in the River Usk catchment area.
AB07	Abergavenny (inc. Llanfoist)	The Old Convent Abergavenny		16	Brownfield	Planning permission has recently been submitted to convert to 16 apartments. Although the scheme has been withdrawn there is potential for resubmission.
CH02	Chepstow	Severn View Residential Home	0.53ha	16	Brownfield	Current application for sui generis temporary housing accommodation. Potential for site to become available for residential (C3) development in the future.
CH03	Chepstow	Existing Lidl site, Bulwark	0.4ha	12	Brownfield	Land vacated when Lidl moves to its new site opposite. Potential for residential development.
CA01	Caldicot (Severnside)	Jubilee Way car park	0.5ha	27	Brownfield	Part of pre-app proposals for Caldicot regeneration over part of the car park area.

MA01	Magor (Severnside)	Manor House farm	0.38ha	13	Brownfield	Subject to pre-app for up to 13 residential units on the site.
MO01	Monmouth	Rear of Museum Building, Priory Street	0.09ha	11	Brownfield	Potential for town centre housing to rear.
Secondary Settlements						
RA01	Raglan	Land north of Monmouth Road	1 ha	23	Greenfield	Private paddock land. Planning application DM/2023/01019 for 21 dwellings (amended from the original submission of 23 dwellings) has been considered by Planning Committee, who resolved to approve the application subject to a S106 Agreement. The site is currently awaiting the signing of the S106 Agreement.



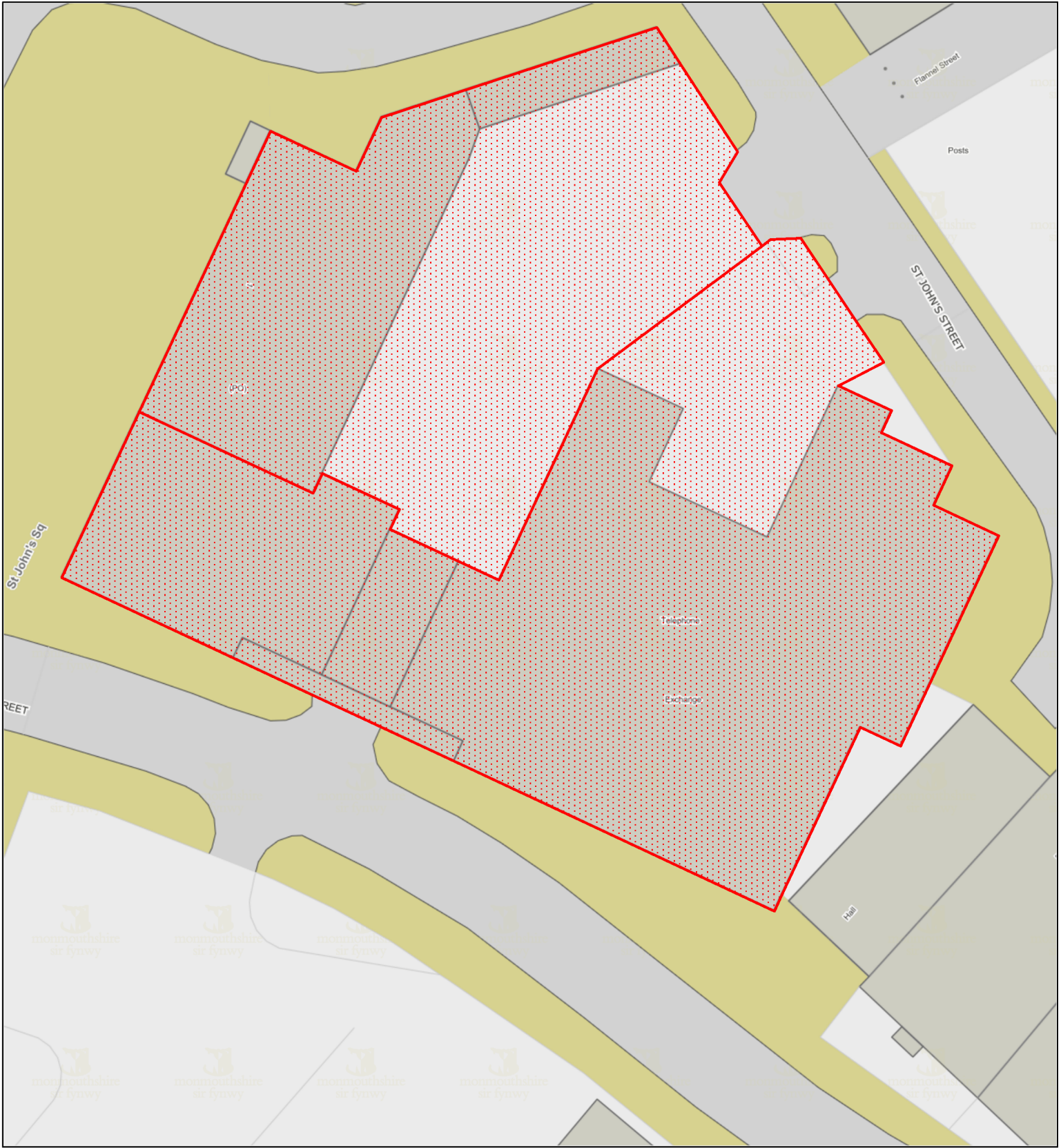
Site Reference	AB01
Address	Land at Midway Lane
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.43ha
Approximate Number of Homes	13
Land Type	Greenfield

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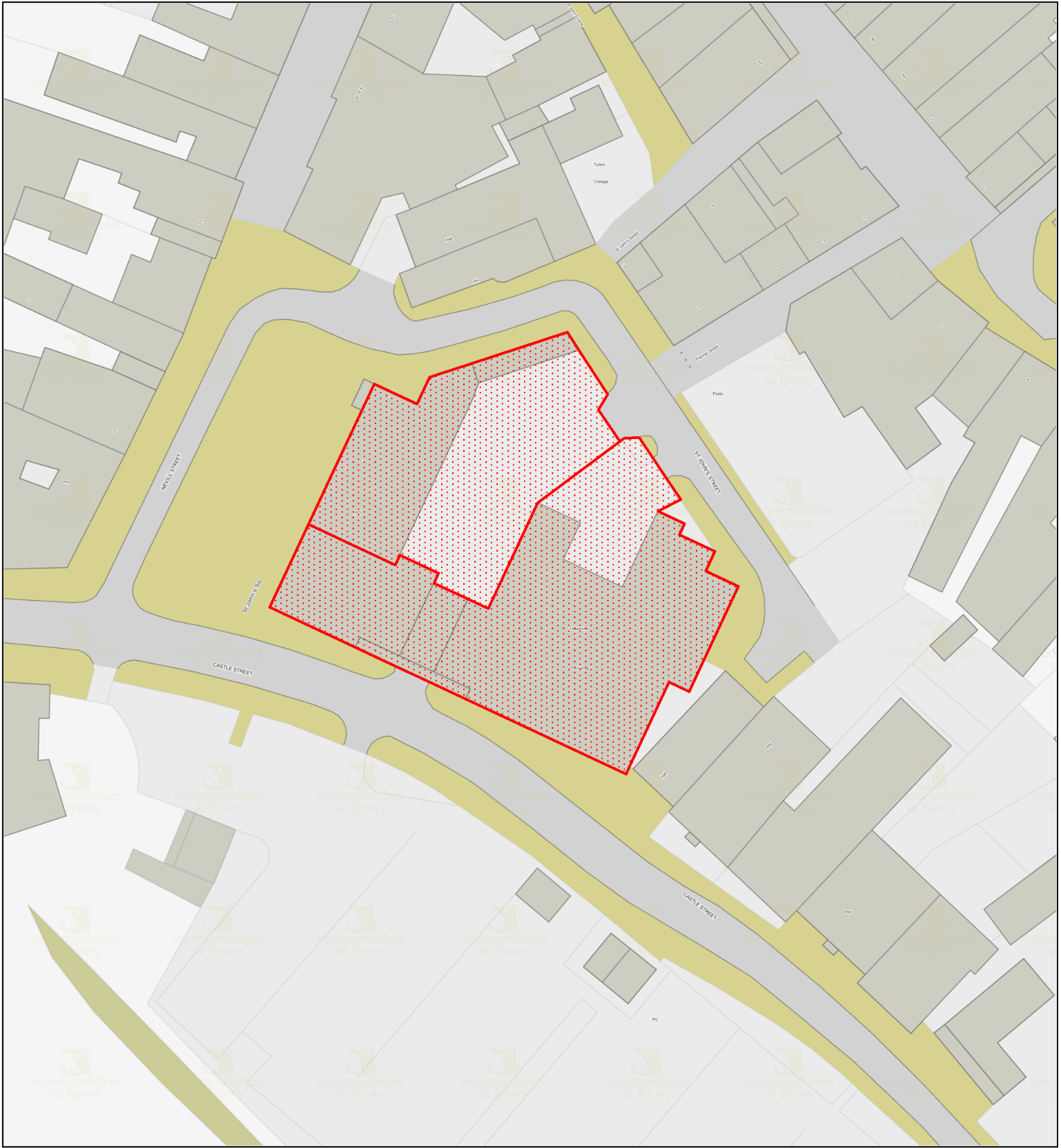
Site Reference	AB02
Address	Land at Lansdown Road
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.53ha
Approximate Number of Homes	16
Land Type	Greenfield

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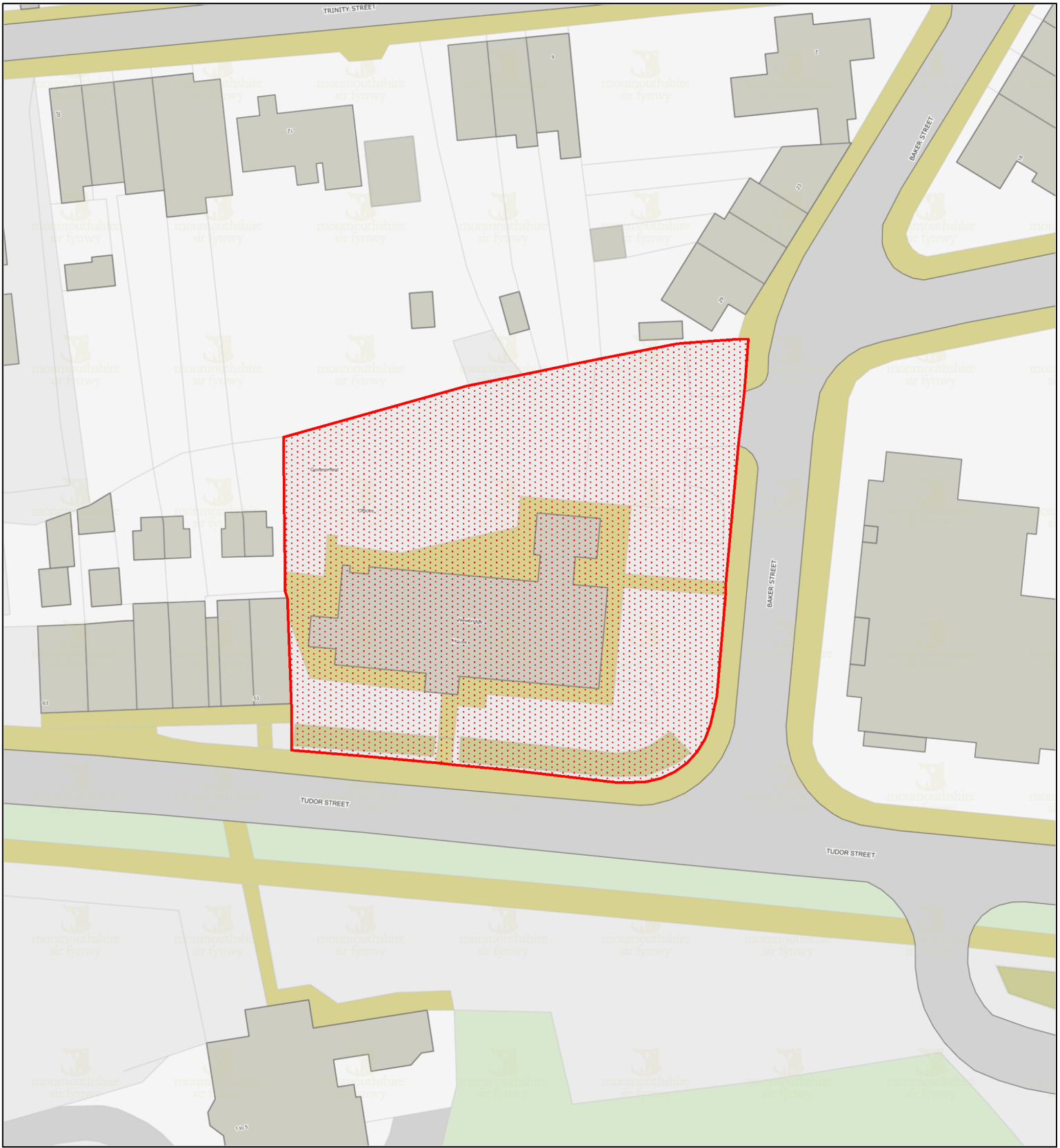
Site Reference	AB03
Address	Post Office, St John's Square
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.08ha
Approximate Number of Homes	10
Land Type	Brownfield

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Site Reference	AB04
Address	BT Exchange
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.1ha
Approximate Number of Homes	10
Land Type	Brownfield

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Site Reference	AB05
Address	Newbridge House, Tudor Street
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.2ha
Approximate Number of Homes	14
Land Type	Brownfield



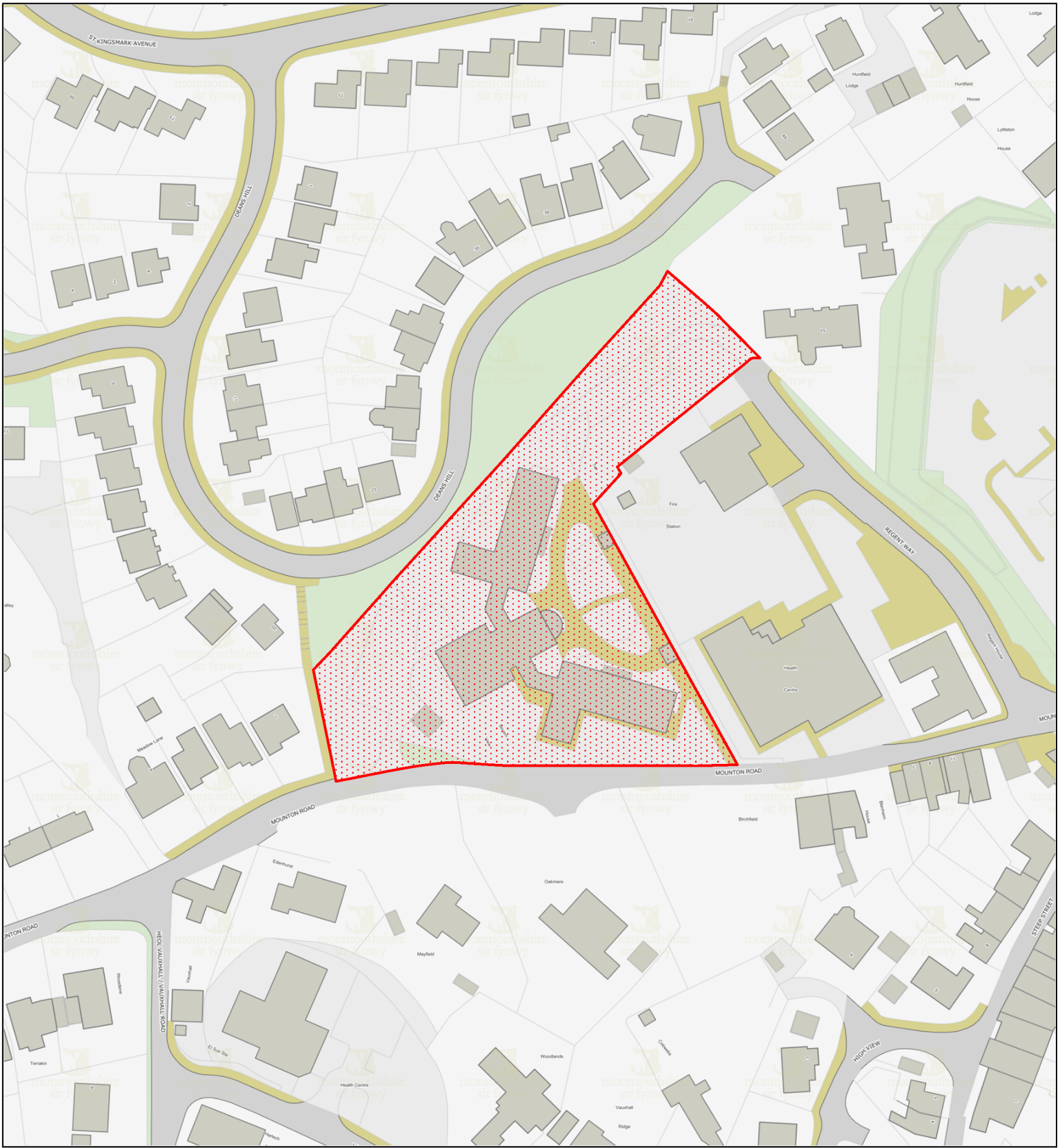
Site Reference	AB06
Address	Greenfield, Merthyr Road
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.41ha
Approximate Number of Homes	18
Land Type	Brownfield

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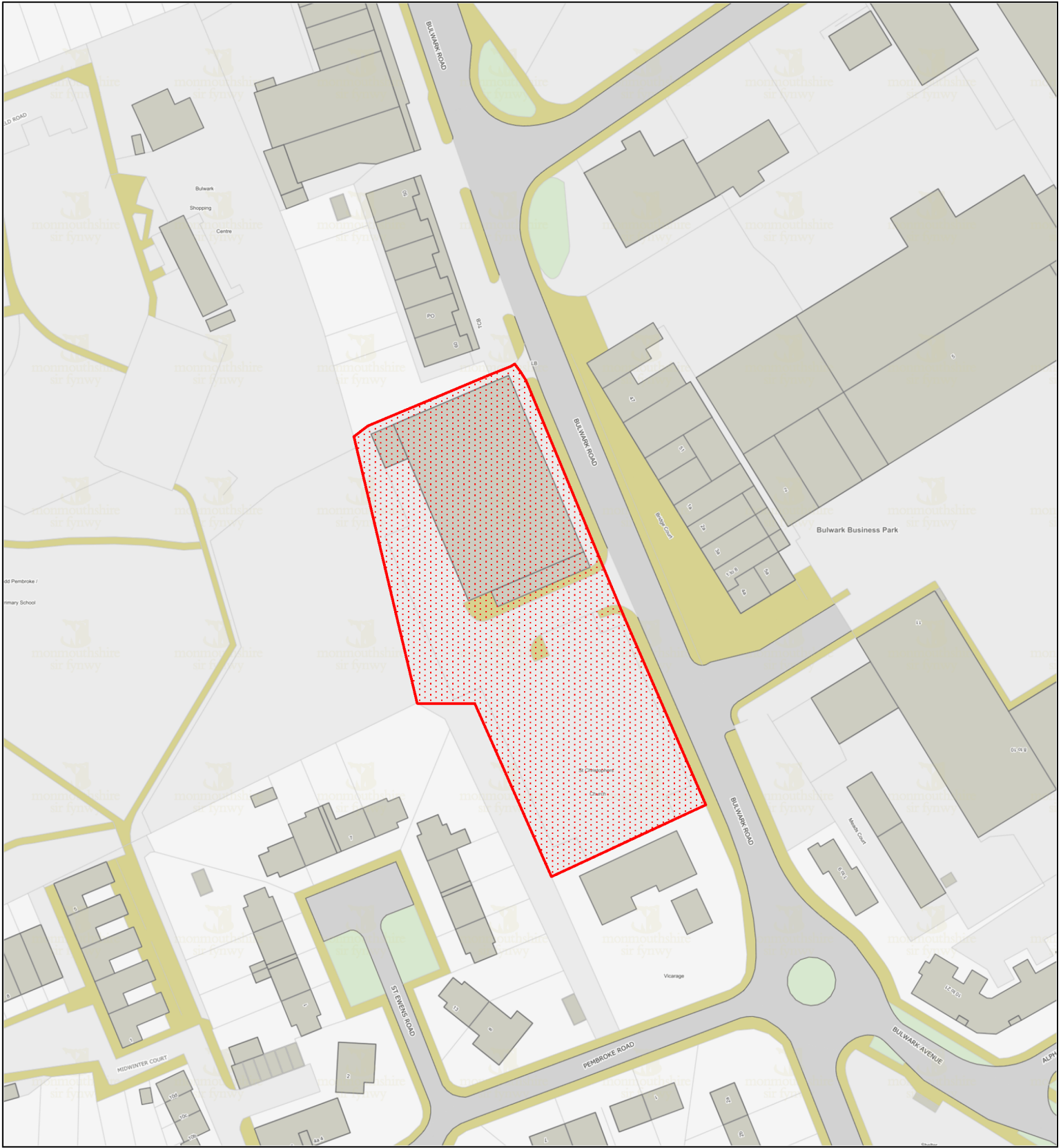
Site Reference	AB07
Address	The Old Convent, Abergavenny
Settlement	Abergavenny (inc. Llanfoist)
Site Area (ha)	0.27ha
Approximate Number of Homes	16
Land Type	Brownfield

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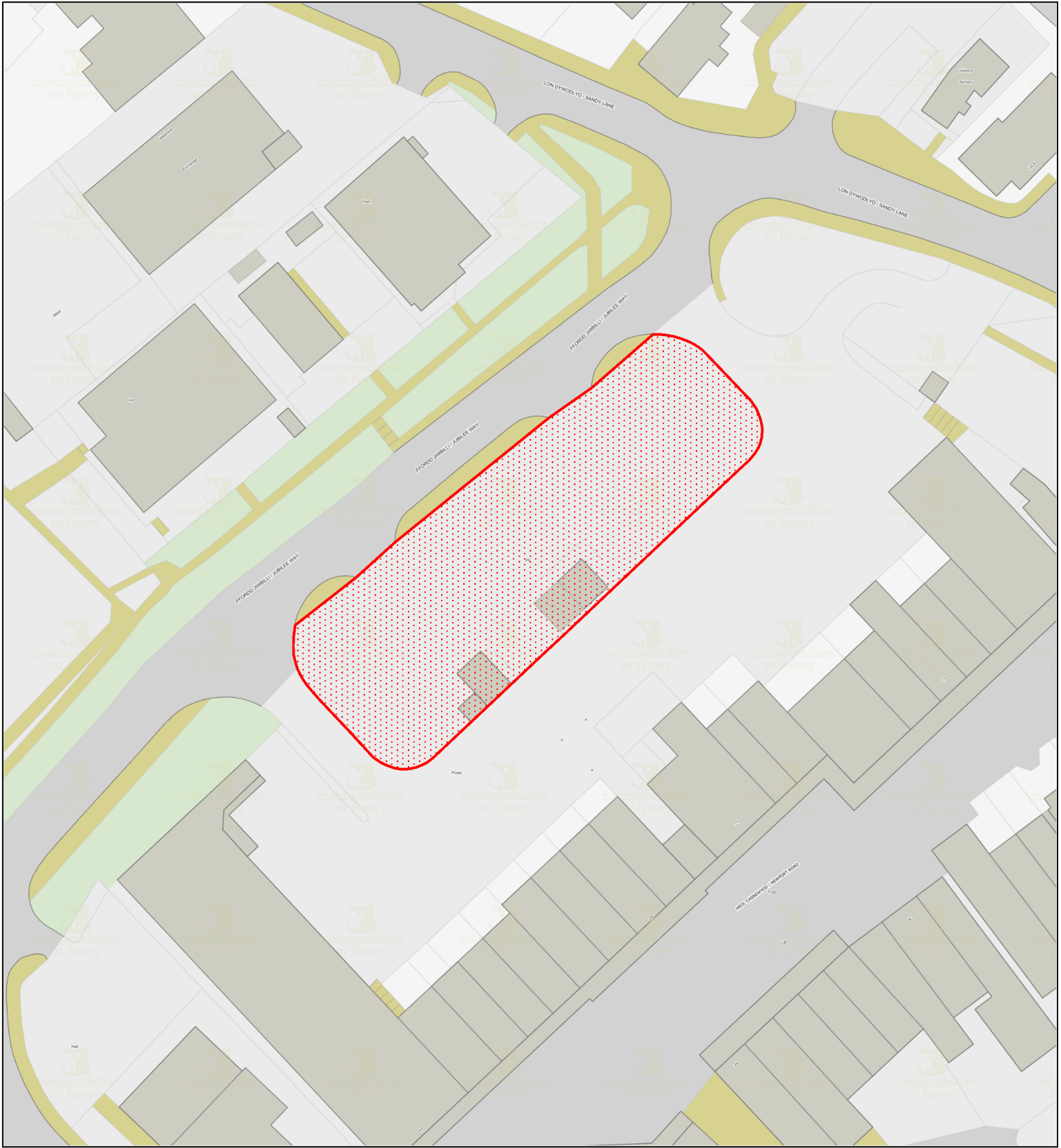


Site Reference	CH02
Address	Severn View Residential Home
Settlement	Chepstow
Site Area (ha)	0.53ha
Approximate Number of Homes	16
Land Type	Brownfield

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Site Reference	CH03
Address	Existing Lidl Site, Bulwark
Settlement	Chepstow
Site Area (ha)	0.4ha
Approximate Number of Homes	12
Land Type	Brownfield



Site Reference	CA01
Address	Jubilee Way Car Park
Settlement	Caldicot (Severnside)
Site Area (ha)	0.5ha
Approximate Number of Homes	27
Land Type	Brownfield

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Site Reference	MA01
Address	Manor House Farm
Settlement	Magor (Severnside)
Site Area (ha)	0.38ha
Approximate Number of Homes	13
Land Type	Brownfield

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Site Reference	MO01
Address	Rear of Museum Building, Priory Street
Settlement	Monmouth
Site Area (ha)	0.03ha
Approximate Number of Homes	11
Land Type	Brownfield

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Site Reference	RA01
Address	Land North of Monmouth Road
Settlement	Raglan
Site Area (ha)	1.08ha
Approximate Number of Homes	23
Land Type	Greenfield

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Appendix 2 – Record of Housing Stakeholder Group

Record of Housing Stakeholder Group 5th September 2024

1. Attendance

- 1.1. Representatives of the following organisations were invited to attend a Housing Stakeholder Group meeting on 5th September 2024. All stakeholders were provided with supporting information in advance of the meeting and given an opportunity to provide written representations in advance of the meeting if they were unable to attend.

Organisation	Attended
Amity Planning	
Asbri Planning	✓
Barratt David Wilson Homes	✓
Bellway Homes	
Boyer Planning	✓
Bron Afon	✓
Candleston Homes	✓
CarneySweeney	
Dwr Cymru Welsh Water	✓
Edenstone Homes	✓
Geraint John Planning	✓
Hallam Land Management	
Home Builders Federation (HBF)	✓
Highlight Planning	
HRT Estate Agents	✓
JR Planning and Development	
LRM Planning	
MCC – Development Management	✓
MCC – Estates	✓

MCC – Housing	✓
MCC – Planning Policy	✓
Melin Homes	✓
Monmouthshire Housing Association	✓
National Grid	
Natural Resources Wales	
Persimmon Homes	
Pobl	✓
Powells Rural	
Redrow Homes	✓
Richbrough Estates	✓
RPS	✓
Rural Housing Enabler	
Savills	✓
Sullivan Planning	
Taylor Wimpey	✓
Turley	✓
Vistry	✓
Wales and West Utilities	

2. Introduction

- 2.1. MCC (Head of Placemaking) explained that the purpose of the meeting is to discuss the circulated housing trajectory and provide stakeholders with an opportunity to note any observations or concerns with the suggested timescales and delivery rates. Views raised at the meeting will be set out in a note and published alongside the Deposit Plan as part of the evidence base.
- 2.2. The Deposit Plan is scheduled to be reported to Place Scrutiny on 10th October and Full Council on 24th October. If endorsed by Council, a consultation exercise on the Deposit Plan will run between 4th November and 16th December 2024. Following the consultation and allowing time to consider the consultation responses, it is then

hoped to take a report to Council in June/July 2025 to seek approval to submit the Plan to Welsh Government for Examination. Indicative dates for the Examination are between September and November 2025, with adoption of the Plan in April/May 2026.

- 2.3. In accordance with the Development Plans Manual three elements of the housing supply were open for discussion at the meeting:- completions rates, existing commitments and new allocations.

3. Past Completions

- 3.1. MCC noted that 2,220 homes have been completed between 2018 – 2024 and have been factored into the housing provision figure of 6,210 homes to be provided over the Plan period.
- 3.2. HBF noted that annual completion rates have fallen during that period and had any analysis been undertaken on the reasons behind that.
- 3.3. MCC noted that a couple of factors have contributed to the falling rate of annual completions including a lag as a result of the phosphates issue impacting on permissions coming through the system over the last few years, as well as the LDP strategic sites now largely built out.

4. Existing Commitments

- 4.1. MCC noted that these are sites over 10 units that have planning permission and there is confidence that they will be delivered in the Plan period. In accordance with the Development Plans Manual, a Non-Delivery Allowance has been factored into this housing supply component with sites excluded where there is uncertainty in terms of delivery.
- 4.2. HBF noted that it would be good to have a record of the sites that have been excluded, possibly as an annex to the meeting note.
- 4.3. MCC noted that a Housing Background Paper will accompany the Deposit Plan which will set out details of the sites excluded from the existing commitments.
- 4.4. No site-specific comments were raised in relation to the sites making up the existing commitments element of the housing supply.

5. New Allocations

- 5.1. The following comments were noted in relation to the proposed new allocations:

Site/Issue	Comments
Planning application timescales	HBF noted that the timescales given for the planning application stages are very optimistic, particularly in relation to the larger sites. Issues such as changes in legislation which fundamentally change how the LPA deal with a planning application and possible layout and surveys requirement can also impact on planning application timescales need to be considered. Reassurance on how the front-loading process works and

	whether the Examination will cause delays in the process would be helpful. POBL agreed that completion timeframes seem optimistic on the larger sites. MCC noted that some elements of the trajectory are reliant upon the development industry getting planning applications in for consideration as early in the development plan process as possible. Many of the site promoters are looking to front load applications, with submission prior to the Examination to add greater certainty to delivery dates. There is a commitment to work with site promoters and keep applications moving through the system to help bring certainty. Discussions with site promoters are ongoing and welcomed.
Availability of Site Evidence	Boyer sought clarification that all site information and assessments will be made available when the RLDP goes to Examination and noted that further questions may emerge once that evidence is publicly available for scrutiny. MCC confirmed that all documentation that goes to Welsh Government and PEDW will also be publicly available. PEDW recently confirmed that will also include appropriate viability evidence.
CS0213 – Land to the East of Abergavenny (HA1)	Savills representing Candleston Homes: Candleston Homes' experience of delivering homes in the County is that it typically takes four years from making a planning submission to completions on site and delivery rates have peaked at around 35/40 homes a year. It is therefore unrealistic to expect first completions in year 2027/28, with first completions in 2029/30 being more realistic. In terms of delivery rates, Candleston typically deliver from one outlet rather than two outlets, however the suggested 105 units per annum is considered to be very high. From Candleston's experience 40 units per outlet is more realistic and therefore a rate of 80/90 units per annum based on two outlets should be included in the trajectory. On this basis, delivery of 300/350 homes in the Plan period is more realistic than the 500 homes, with the first completion recorded in 2029/30. Any shortfall in numbers would need to be made up through a new site(s) in the Abergavenny area. A review of the trajectory nearer to the Examination will be helpful to have to latest position in terms of planning applications. Geraint John Planning noted that there is a lead-in time of 4 years built into the trajectory for the sites, as opposed to 2/3

years, which will allow sufficient time to obtain the relevant outline/reserved matters permissions.

In terms of annual completions, if the 105 completions were reduced to circa 90 units per annum, this would only displace 60 units beyond the core years (105 units) to the final year. This would result in the final year totalling around 70 units, which would not be a number that is unachievable in any event and will still yield within the Plan period. Accordingly, there is sufficient capacity in the trajectory to deliver the 500 units within the Plan period.

Affordable housing accounts for 50% of homes on the site, opening up two markets to draw on.

Dwr Cymru noted that they do not have any networks on the east of the A465 so modelling work will be required. They would encourage early dialogue so that they can be in a position to support any planning application. It would be beneficial to look at modelling work up front to inform the planning process.

Boyer reserved the right to raise further comments on the trajectory once the supporting information is available to review.

Monmouthshire Housing Association noted that this site will deliver 50% affordable housing and 50% of the site available for sales. Using the principle of two outlets at 40 units per annum and then potentially the affordable housing at a similar rate, the speed of the site is going to be predicated on only 50% of the suggested trajectory rate. If the suggested rate of 80 homes a year (from two outlets), plus the affordable homes are used as a basis for the trajectory, the site could potentially be delivered within 3.1 years.

MCC noted that Monmouthshire is the first Council in Wales to require this level of affordable provision so it is quite unique in terms of delivery trends that could apply.

RPS noted that comments have previously been submitted in relation to CS0293 – Abergavenny East 2, which still remain relevant.

Highlight Planning forward comments via email to note that they are concerned that the trajectory (as amended by MHA) is overly ambitious, and comments previously submitted in relation to Policy S7 – Preferred Strategic Site Allocations of the Preferred Strategy remain valid.

Trajectory Amendment: Following the discussion at the HSG meeting, MHA provided an updated trajectory which will be incorporated into the Deposit Plan: 2028/29 – 70 units; 2029/30 – 90 units; 2030/31 – 90 units; 2031/32 – 90 units; 2032/33 – 90 units and 2033+9mths – 70 units.

CS0094 – Land at Penlanlas, Abergavenny (HA5)	Edenstone Homes noted agreement with the trajectory. No further comments received on the site.
CS0165 – Land at Mounton Road, Chepstow (HA3)	No comments received on the site.
CS0076 – Land at Rockfield Road, Monmouth (HA6)	No comments received on the site.
CS0270 – Land at Leasbrook, Monmouth (HA4)	No comments received on the site.
CS0277 – Land at Drewen Farm, Monmouth (HA7)	RPS noted that the PAC closes tomorrow (6 th September 2024) for this site and an application will follow shortly. HBF noted that it would be helpful to have an extra column setting out any planning application information. MCC agreed to add an extra column in the trajectory tables setting out planning application details where relevant.
CS0189 – Tudor Road, Monmouth (HA8)	No comments received on the site.
CS0087/CS0251 – Land to the East of Caldicot /North of Portskewett (HA2)	HBF noted the time period for the determination of planning application is similar to smaller sites which may be unrealistic given the strategic scale of the site. Sites this size tend to be submitted in phases, with planning applications not necessarily covering the whole development from day one. This can result in gaps in delivery rather than a constant rate of delivery. It might be worth looking at evidence on this from previous sites to see if any trends emerge.

Savills on behalf of Taylor Wimpey: have a written submission which will be submitted as part of the Deposit consultation but in summary relate to two key points on timescales to begin delivery and delivery rates.

In relation to timescales for delivery the trajectory assumes Caldicot East will begin delivering homes from 2027/28. A review of the Adopted Local Development Plan provides the average length of time that it took between the submission of a first planning application and completion of the first house onsite. This shows an average period of time from the submission of the first application to first completion of four years, with a range between two and six years. These Strategic Sites are considerably smaller than Caldicot East and therefore the trajectory timescales do not reflect these timescales. The Lichfield's Start to Finish Paper adds further analysis of timescales for varying sites sizes across the UK and should be referred to. Taylor Wimpey is of the view that it will take somewhere between four and five years for the approval of a planning application which is more likely to be submitted in 2026/27 than 2025/26. It follows that the first completions are unlikely to be before 2030/31.

In relation to assumed delivery rates, the trajectory assumes that Caldicot East will deliver 75 homes in the first year, 125 homes per year for the next five years, and then 70 homes in the final year of the RLDP. While the Strategic Sites allocated in the Adopted LDP are smaller in size than Caldicot East, a review of delivery rates indicates an average delivery rate of 51.5 homes per annum across all the sites and mostly from one outlet. Due to its size, it is assumed Caldicot East will be delivered from two outlets. A delivery rate of 125 homes per annum is unlikely to be achieved and that a delivery rate of circa 100 homes per annum is more realistic, although possibly still optimistic. Taylor Wimpey suggest delivery commencing on site in 2030/31 at a rate of 100 per annum for three years and 75 units in the remainder of 2033, giving a total of 375 units within the Plan period.

Richborough Estates noted that they are confident in the trajectory that has been put forward. It is appreciated that it is ambitious, but as site promoters, Richborough has front loaded the process with supporting documentation and technical reports to support the early submission of a planning application. Richborough specialise in bringing sites to market and making sure that housebuilder delivery partners can get on site as soon as possible. The benefits of 50% affordable housing in relation to delivery rates also apply to this site.

Highlight Planning via email noted that they are concerned that the trajectory as set out is overly ambitious. Comments

	previously submitted on behalf of Edenstone Homes in relation to Strategic Policy S7 – Preferred Site Allocations of the Preferred Strategy remain valid.
CS0009 – Land at Former MoD, Caerwent (HA9)	No comments received on the site.
CS0183 – South of Monmouth Road, Raglan (HA10)	No comments received on the site.
CS0113 – Land East of Burrium Gate, Usk (HA11)	No comments received on the site.
CS0037 – Land west of Trem yr Ysgol, Penperlleni (HA12)	No comments received on the site during the meeting. Highlight Planning noted via email that they are supportive and confident of the trajectory set out. They have undertaken a package of technical assessment work to support the masterplanning to date and are considering an early application to further demonstrate deliverability at the point of examination.
CS0077- Land Adj. Piercefield Pub, St Arvans (HA13)	No comments received on the site.
CS0214 – Land at Churchfields, Devauden (HA14)	MCC clarified that this site is scheduled to commence in 2031/32 and therefore later than the other sites due to the ongoing Review of Permits for Wastewater Treatment Works in phosphorous sensitive SAC river catchments timescales. No further comments on the site.
CS0016 – Land East of Little Mill (HA15)	No comments received on the site.

CS0241 – Land North of Little Mill (HA16)	This has a resolution to approve planning permission- awaiting the signing of the Unilateral Undertaking. No further comments on the site.
CS0027 – Land adj. Llanellen Court Farm, Llanellen (HA17)	No comments received on the site.
CS0232 – Land West of Redd Landes, Shirenewton (HA18)	No comments received on the site.