



Powys Replacement Local Development Plan (LDP) (2022-2037)

Powys Housing Need and Supply

2. Housing Supply Background Paper

April 2024



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1. Introduction

1.0.1 This background paper has been produced as part of the evidence base to support the Powys Replacement Local Development Plan (LDP). The purpose of the document is to determine and provide justification to the housing supply element of the dwelling requirement figure. The background paper should be read in conjunction with other relevant supporting documents, together with the latest [Annual Monitoring Report \(AMR\)](#) for the Powys LDP area.

1.0.2 The paper is primarily a technical document which uses housing completions and permissions data, collated as part of the AMR, as a basis for calculating likely sources of housing delivery over the Replacement LDP plan period. The Development Plans Manual (Edition 3) requires that within the Replacement LDP each housing component should be clearly defined, robustly justified, related to the settlement hierarchy and consistent in terminology.

1.0.3 The housing supply position detailed in this background paper reflects a single point in time, based on the available data. The document will be updated throughout the Replacement LDP process to reflect the latest sources of information, and greater detail available in the emerging Replacement LDP. As the main source of data for this background paper is the latest published AMR, the base date for the background paper matches that of AMR 2024, i.e., 1st April 2024.

1.0.4 On 17th December 2020, Natural Resources Wales (NRW) issued a letter to Powys, highlighting that designated riverine Special Areas of Conservation (SAC) water bodies, within the River Wye SAC, were failing to meet phosphorus limits which had been tightened in 2016 by the Joint Nature Conservation Committee (JNCC). This was followed by a further letter on 20th January 2021, following publication of the condition status report on the other riverine SACs in Wales, including the Usk, Dee and Towy. The catchments of which all impact upon the Powys LDP area. NRW issued Interim Planning Advice in December 2020, which has now been updated and is under review, which requires new development within the affected SAC catchments to achieve phosphate neutrality. Consideration is given throughout this background paper on how the requirement to achieve phosphate neutrality will affect the housing supply.

2. Sources of Housing Supply

2.1 Housing Supply Overview

2.1.1 The housing supply is made up of different sources which are anticipated to contribute to the housing provision in the Replacement LDP, these can be summarised as follows:

- **Completions** - Dwellings completed since the start of the Replacement LDP plan period (these will be dated from 1st April 2022).
- **Commitments** - Dwellings anticipated to be built over the Replacement LDP plan period on large sites with existing planning permission.
- **Windfalls** - Unallocated sites which are likely to be developed over the Replacement LDP plan period on small and large sites.
- **Allocations** - Sites to be allocated for residential development in the Replacement LDP (these will be considered in future iterations of this paper, once a housing provision figure has been established).

2.1.2 Housing sites are categorised as being either large or small. Large housing sites are defined as sites with a net gain of five or more dwellings, whereas small housing sites are those with four dwellings or less. For clarification, small windfall sites also include sites that were previously large housing sites but had less than five units remaining to be completed at the start of the Replacement LDP period (2022) (see Section 5.1).

2.1.3 A further explanation and analysis of the sources of supply are detailed in the following sections.

3. Completions

3.0.1 The Replacement LDP Period began in 2022, therefore as the plan’s preparation progresses towards Adoption some dwellings will be completed and will have delivered against the plan’s housing requirements. The number of dwellings completed in the LDP area is worked out from the monitoring used to inform the latest AMR. To align with the AMR, data is captured within 1st April to 31st March periods, with the completions data in this paper referring to dwellings built between 1st April 2022 and 31st March 2024. This includes dwellings on both small sites and large sites.

3.0.2 The LPA has a monitoring database which records and tracks the progress of every planning permission granted resulting in new dwellings. These records are cross referenced with Building Control data, Council Tax records, EPC certificates and other sources such as Rent Smart Wales on an annual basis. In some cases, site surveys are undertaken. Every site has its own record in the database preventing any duplication from occurring.

Table 1. Total Number of Dwellings Completed on Small and Large Sites between 1st April 2022 and 31st March 2024

	Small Sites	Large Sites	Total
Completions (1st April 2022 – 31st March 2023)	93	246	339
Completions (1st April 2023 – 31st March 2024)	102	162	264
TOTAL	195	408	603

4. Housing Commitments

4.0.1 Large housing sites with extant planning permission at the start of the Plan period (2022), form the potential Housing Commitments of the Replacement LDP. These sites can be identified from three sources, with reference to the Adopted LDP (2011 – 2026).

- The Housing Commitments (HC) / Housing Land Bank Sites (HLB) shown in the Adopted LDP that are not built out and have not lapsed.
- The Housing Allocations in the Adopted LDP that have secured planning permission and are not built out.
- Large windfall sites that have been granted planning permission since the base date (April 2015) of the Adopted LDP that are not built out and have not lapsed.

Table 2. Total Number of Units with Extant Planning Permission on Large Sites on 1st April 2024* – Potential Replacement LDP Housing Commitments

	Not Started	Under Construction	Total
Adopted LDP Housing Commitments with extant planning permission	174	92	266
Adopted LDP Housing Allocations with extant planning permission	489	265	754
Large windfall sites with extant planning permission	684	299	983
Totals	1,347	656	2,003

*Only includes dwelling units which can be reasonably expected to be built during the Replacement LDP Plan Period, up to 2037.

4.0.2 Table 2 shows that the potential Housing Commitments in the Replacement LDP include 1,347 dwellings that had not started on 1st April 2024 and 656 dwellings that were under construction on this date. This gives a total contribution to the housing supply of 2,003 dwellings which can be reasonably expected to be built during the Replacement LDP Plan Period up to 2037.

4.0.3 A full list of the Replacement LDP Housing Commitments (at 1st April 2024) is included within Annex 3.

4.1 Riverine SAC Phosphorus Sensitive Catchment

4.1.1 Housing Sites need to have a realistic chance of being delivered within the Replacement LDP plan period for them to contribute towards the housing supply. It is

important therefore that consideration has been given to the deliverability of large housing sites in Riverine SAC phosphorus sensitive catchments.

4.1.2 For the Replacement LDP area that falls with a Riverine SAC phosphorus sensitive catchment the following approach has been undertaken to determine housing supply:

- Housing Commitments will only include sites that have already received all the necessary permissions to enable development to commence, **or**
- Housing Commitments are located within a settlement identified to receive improvements (including the installation of phosphorous reduction equipment), to public Wastewater Treatment Works in Dwr Cymru's – Welsh Water's; seventh Asset Management Programme (AMP 7) 2020 - 2025.

4.1.3 This approach may be subject to change in future iterations of this document, particularly as more certainty regarding the priorities for Dwr Cymru's - Welsh Water's AMP 8 become available.

4.1.4 The settlements identified for improvements (including phosphorus reduction) to the public Wastewater Treatment Works (WwTW) in Dwr Cymru's AMP 7 are: Bronllys, Builth Wells and Llanellwedd, Clyro, Howey, Norton, Presteigne, Rhayader, Llandrindod Wells and Llanfihangel Tal-y-llyn.

4.1.5 Table 2 only considers sites those dwelling units which can be reasonably expected to be built during the Replacement LDP Plan Period up to 2037, therefore any constrained sites in the Riverine SAC phosphorus sensitive catchments have been excluded from the data in accordance with paragraph 4.1.2.

4.2 Non – Delivery Allowance

4.2.1 Not every site that gets planning permission gets developed or developed in full, and as a result not all dwellings permitted become new housing completions. The Development Plans Manual states 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. 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.

4.2.2 A non-delivery allowance for the committed housing sites in the Replacement LDP has been calculated by assessing the performance of the Housing Commitments identified in the Adopted LDP (2011-2026).

4.2.3 Table H2 – LDP Housing Provision, in the Adopted LDP (2011-2026) shows that in 2015 there were 1,017 dwellings not started, with a further 162 dwellings under construction on Housing Committed Sites. This meant that before the application of a non-delivery allowance, the housing provision figure included within the Adopted LDP (2011-2026) in April 2015, identified 1,179 dwellings in the housing land supply on Housing Committed Sites. Since April 2015, and up to 31st March 2024, the housing land supply of 1,179 dwellings on Housing Committed Sites has resulted in 539 new dwellings.

4.2.4 The progress of the Committed Housing Sites in the Adopted LDP (2011-2026) needs to be considered up to the end of the Adopted LDP plan period (2026), in order to calculate a non-delivery allowance to be applied in the Replacement LDP. This means estimating the number of completions anticipated on the Committed Housing Sites, identified in the Adopted LDP, for the remaining two years (2024 – 2026). This has been done, using the average completion rate between 2015 and 2024 (60 dwellings per annum) and multiplying it by two, resulting in an anticipated total of 120 dwellings.

4.2.5 Taking into consideration the 2015-2024 completion figures (539 dwellings) and the anticipated remaining two years (120 dwellings), 659 dwellings are expected to have been completed on the Adopted LDP Committed Housing Sites, between 2015 and the end of the Adopted LDP plan period. Comparing the 659 dwellings to the 1,179 dwellings identified in Table H2 – LDP Housing Provision, in the Adopted LDP (2011-2026), shows a delivery rate of 56%, giving a shortfall of 44%.

4.2.6 This means that 44% of the dwellings identified on Housing Committed Sites in the Adopted LDP (520 dwellings) are expected to not result in new dwellings completions. To determine the number of completed dwellings expected to contribute to the housing land supply from the Replacement LDP potential Housing Commitments, a non-delivery allowance discount of 44%, based on historic trends, can be applied.

4.2.7 The 44% non-delivery allowance has been applied to the 1,355 dwellings on potential Replacement LDP Housing Commitments, yet to commence. This results in 596 dwellings being taken out of the contribution from Housing Commitments to the overall Replacement LDP housing supply, see Table 4.

Table 4. Replacement LDP Housing Commitments - Total Number of Dwellings on Large Sites with Planning Permission on 1st April 2024, adjusted to take into Consideration Non-Delivery Allowance

	Not Started	Under Construction	Total
Replacement LDP Housing Commitments	1,347	656	2,011
Totals minus non-delivery allowance (44%)	754	656	1,410

5. Windfall Allowance

5.1 Windfall Sites

5.1.1 Windfall sites are sites which are not included as allocations as part of the housing land supply, but which subsequently become available for housing development. Whilst therefore, windfalls are not planned, they are an expected type of development and, as such, will contribute towards the housing provision of the Replacement LDP.

5.1.2 Windfall sites can come forward on both small (four or less dwellings) and large (five or more dwellings) sites. Examples of such developments include conversions to dwelling units from redundant farm buildings or the change of use of a hotel to flats or apartments. It includes infill sites within a settlement (not on allocated sites) and also individual, sometimes isolated dwelling units that have been given planning permission to meet a specific housing need such as a rural enterprise dwelling or an affordable dwelling.

5.1.3 The Development Plans Manual (Edition 3) requires LPAs to undertake an analysis of past windfall trends, with small and large sites windfall rates set out as separate components. The manual requires that LPAs review windfall delivery rates for both small and large sites, over different time periods, to determine a future extrapolation rate. Periods of abnormally high or low completion rates are considered inappropriate to include in a future extrapolation rate. Therefore, the evidence detailed in this background paper needs to be clear as to what period has been chosen and the rationale for doing so. The time period chosen must be sufficient to rule out anomalies in specific years and be of a reasonable duration. The manual also states that large windfall sites should not be included in the first two years of supply to avoid issues of double counting.

5.2 Historic Windfall Rates

5.2.1 Table 5 details the total number of dwellings completed on windfall sites from the start of the Adopted LDP plan period (2011) to the 31st March 2024. Since the start of the plan period, in 2011, the progress of every planning permission that has resulted in a net gain of dwellings has been monitored as detailed in paragraph 3.0.2 above. This has enabled the LPA to build up a comprehensive dataset of housing completions on windfall sites to assist in the determination of a future extrapolation rate for the Replacement LDP.

5.2.2 Large site windfall completion data for the 2014-2015 monitoring period has been excluded from the dataset and totals. This is due to issues with the way data was collated in that monitoring period, resulting in inconsistencies.

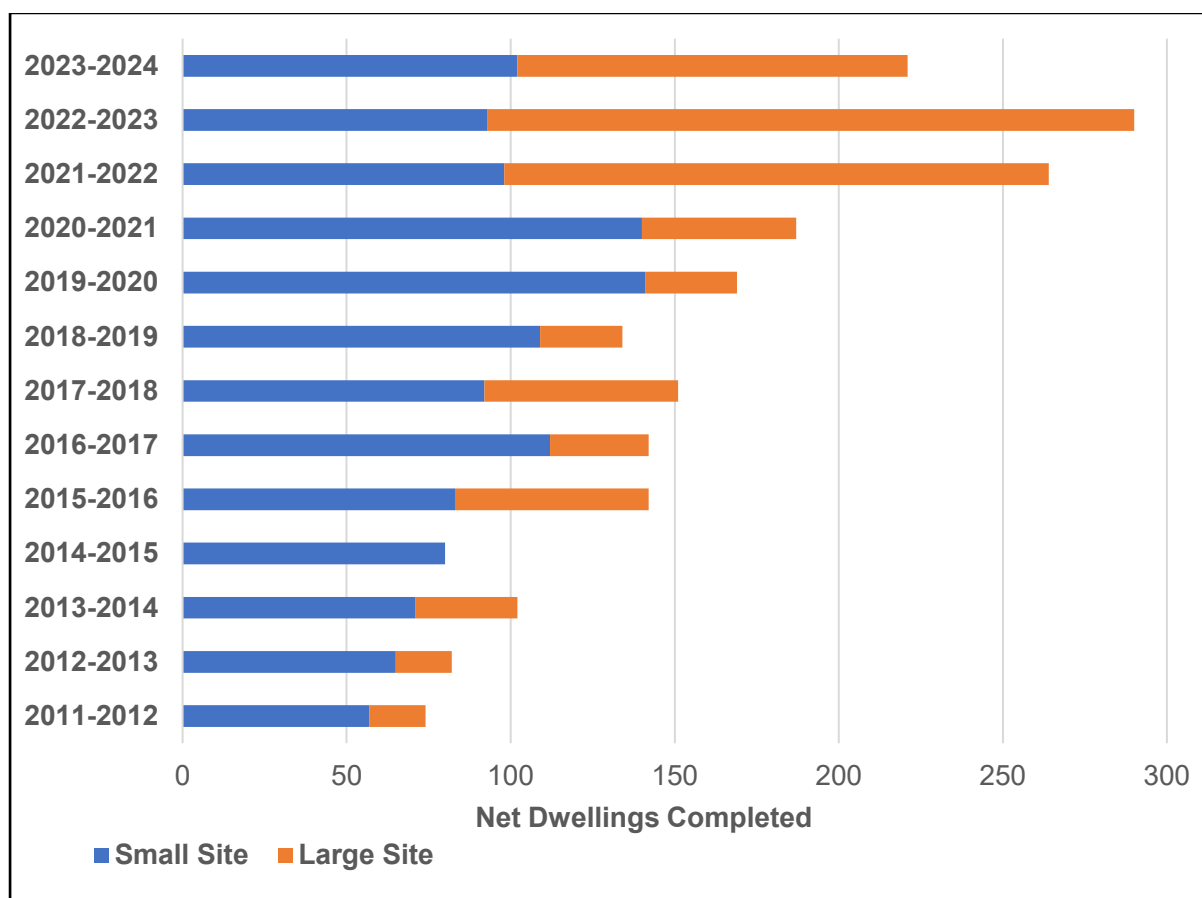
5.2.3 Table 5 shows a total of 1,958 dwellings being completed on windfall sites during the thirteen-year period, 2011-2024. Of the 1,958 dwellings, 1,243 were on small sites with 795 on large sites.

Table 5. Total Number of Dwellings Completed on Windfall Sites between 2011 and 2024

Year	Small	Large	Totals	% of Completions
2011-2012	57	17	74	75%
2012-2013	65	17	82	35%
2013-2014	71	31	102	48%
2014-2015	80			
2015-2016	83	59	142	45%
2016-2017	112	30	142	57%
2017-2018	92	59	151	76%
2018-2019	109	25	134	83%
2019-2020	141	28	169	72%
2020-2021	140	47	187	59%
2021-2022	98	166	264	72%
2022-2023	93	197	290	73%
2023-2024	102	119	221	84%
	1,243	795	1,958	65%
Average =	96	66	163	65%

*Note: The small sites are divided by 13 to represent the fact that there are 13 years of data whilst large sites are divided by 12 due to the omission of the 2014-2015 data.

Figure 1. Total Number of Dwellings Completed on Windfall Sites between 2011 and 2024.



5.2.4 Figure 1 shows that the number of housing completions on windfall sites has progressively increased since 2011. This can be partially attributed to improvements to monitoring, whereby, the LPA is now using more data sources to identify completions, instead of relying solely on Building Control completions data for small sites, which was the case in 2011. This does mean that some dwellings on small sites completed in the early years of the Adopted LDP were not captured until a few years later skewing the data slightly.

5.2.5 In accordance with the Development Plans Manual (Edition 3) windfall data over several time periods should be considered. Table 5 and Table 6 show the windfall rates split over two different periods, to the 2011 – 2024 data, detailed in Table 5. Table 6 details the years before the Adopted LDP came into effect i.e., 2011 to 2018, whilst Table 7 shows completions on windfall sites over the past six years, 2018 to 2024.

Table 6. Total Number of Dwellings Completed on Windfall Sites between 2011 and 2018 (before LDP (2011 – 2026) Adopted)

Year	Small	Large	Totals
2011-2012	57	17	74
2012-2013	65	17	82
2013-2014	71	31	102
2014-2015	80		
2015-2016	83	59	142
2016-2017	112	30	142
2017-2018	92	59	151
Total	560	213	773
Average =	80	36	116

Table 7. Total Number of Dwellings Completed on Windfall Sites between 2018 and 2024 (Previous Six Years)

Year	Small	Large	Totals
2018-2019	109	25	134
2019-2020	141	28	169
2020-2021	140	47	187
2021-2022	98	166	264
2022-2023	93	167	290
2023-2024	102	119	221
Total	683	552	1,265
Average =	114	92	211

5.2.6 It can be seen when comparing Table 6 with Table 7, that there is a large contrast between the total and average number of dwelling completions that have taken place on windfall sites over the two periods. The average completion rate for the five-year period 2018 to 2024 was 211 dwellings completed per year, compared to the average of 116 dwellings completed per year in the seven-year period 2011-2018.

5.2.7 The contrast between the two periods can be partially accounted for by recognising that the first period (2011-2018) was subject to undercounting as detailed in paragraph 5.2.4. The higher build rates in the second period (2018-2024), can also be partially attributed to the number of dwellings being built on sites permitted through a lack of five-year housing land supply (explained in detail in paragraphs 5.3.3 to 5.3.4).

5.2.8 In terms of identifying a future windfall rate, it is considered most appropriate to use the full thirteen years' worth of data, which reflects how circumstances change over a longer timeframe. This will take into consideration the contrast between the two periods detailed in Table 5 and Table 6. It is recognised that the number of dwellings being built on sites permitted through a lack of five-year housing land supply creates an anomaly in the data, this has been resolved through Section 5.3

5.3 Estimating Future Windfall Rates

5.3.1 To estimate what future windfall rates may be, consideration needs to be given to any reasons why the supply of housing completions recorded is unlikely to continue into the Replacement LDP period. This includes:

- Identifying how many housing completions on windfall sites can be seen as a result of the lack of five-year housing land supply policy position that the LPA was in during 2016-2018, and
- Considering the number of windfall completions in the Replacement LDP area that fall with a Riverine SAC phosphorus sensitive catchment and are unlikely to come forward as similar developments in the Replacement LDP period.

5.3.2 Paragraphs 5.3.3 to 5.3.15 cover these points in turn.

Lack of Five-Year Land Supply

5.3.3 Welsh Government introduced the residual land supply method, through Technical Advice Note (TAN) 1 in 2015. Through the application of the residual land supply method, the subsequent Joint Housing Land Availability Study (2016) was unable to demonstrate a five-year supply of readily developable housing land.

5.3.4 The consequence of not having a five-year supply of developable land for housing was that the housing land supply figure became a material consideration in the determination of planning applications. This resulted in the LPA approving planning applications for residential development outside of development boundaries of the former Adopted Powys Unitary Development Plan, where considered appropriate. These sites are referred to as 'departure sites'. The Adopted LDP came into force 17th April 2018 with a new set of housing allocations and an increased provision of housing land, meaning that there was no longer a lack of five years housing land supply.

5.3.5 TAN 1 and the need to demonstrate a five-year supply of readily developable housing land was revoked by Welsh Government in March 2020. This means that when looking at historical windfall rates, the departure sites need to be identified and excluded from past trends as such sites will not contribute to the supply of windfall sites in the Replacement LDP period going forward.

Table 8. Total Number of Dwellings Completed on Windfall Sites Classed as Departure Sites between 2011 and 2024.

	Small	Large	Total
Number of Dwellings	64	271	335

Riverine SAC Phosphorus Sensitive Catchment

5.3.6 As detailed in paragraph 1.0.4, NRW issued Interim Planning Advice in December 2020, which required new development within the riverine SAC phosphorus sensitive catchments to achieve phosphate neutrality or betterment.

5.3.7 The historical windfall completions detailed in Table 5, include dwelling completions on sites located within riverine SAC phosphorus sensitive catchments. Similar sites would now need to demonstrate that they can achieve phosphate neutrality or betterment to secure the necessary planning permissions for development to be able to commence.

5.3.8 Therefore, a judgement has been made using the best available information, to identify the proportion of historic windfall dwelling completions in the riverine SAC phosphorus sensitive catchments, that would be able to contribute to future windfall rates in the Replacement LDP period, whilst achieving phosphate neutrality or betterment (in line with NRW guidance).

5.3.9 Table 9 details the total number of completions on windfall sites that took place between 2011 and 2024 in a riverine SAC phosphorus sensitive catchment. It is worth noting that most of these completions would have been the result of planning permissions granted before NRW issued its letter in 2020 (see paragraph 1.0.4) or are small sites with their own private treatment works that comply with the NRW guidance.

Table 9. Total Number of Dwellings Completed on Windfall Sites within a Riverine SAC Phosphorus Sensitive Catchment between 2011 and 2024.

	Small	Large	Total
Number of Dwellings	509	168	677

5.3.10 To determine future windfall rates in the riverine SAC phosphorus sensitive catchments, consideration has been given to how the historic windfall completions fit with NRW’s advice regarding phosphate neutrality or betterment.

5.3.11 In the first instance, the historic windfall completions located within settlements identified to benefit from planned AMP7 improvements to WwTW, were identified. It is anticipated, that once the AMP7 improvements have taken place, there will be no restrictions (due to phosphates) on windfall developments discharging wastewater to public WwTW in these settlements. Table 10 shows that the total number of dwellings completed on windfall

sites, between 2011 and 2024, within such settlements equates to 272 units. It can be assumed that similar dwelling completions will continue to contribute to the housing supply in the Replacement LDP period.

Table 10. Total Number of Dwellings Completed on Windfall Sites Within Settlements with Planned WwTW AMP 7 Improvements between 2011 and 2024.

	Small	Large	Total
Number of Dwellings on Sites in a settlement with planned AMP7 improvements.	151	121	272

5.3.12 There will be small windfall sites, that are not within those settlements that will benefit from AMP7 improvements, that will be able to come forward in line with NRW's advice (2020), where they are able to demonstrate they can achieve phosphate neutrality or betterment. To determine what proportion of such windfall sites will be able to come forward, a comparison has been made between the dwellings granted planning permission in the monitoring periods 2018-2019 (before NRW's advice) and 2021-2022 (after NRW's advice). The percentage difference has then been used to discount the number of dwelling completions on small windfall sites that are unlikely to contribute to the supply in the Replacement LDP period due to the phosphate constraint.

Table 11. Total Number of Dwellings Granted Planning Permission on Small Windfall Sites outside of Settlements with Planned WwTW AMP 7 Improvements.

Year Permission Granted	Number of Dwellings
2021 – 2022	24
2018 – 2019	53
Percentage Difference	55 %

5.3.13 Table 11 shows a 55% difference between the number of dwellings being granted planning permission before and after NRW's advice was issued. The total number of dwellings completed on small sites between 2011-2024 in the Riverine SAC phosphorus sensitive catchments is 509 dwellings. Of the 509 dwellings, 151 dwellings (Table 10) were completed within a settlement that has planned AMP 7 WwTW improvements. This means that a total of 358 dwellings were completed on small windfall sites that would now need to demonstrate phosphate neutrality or betterment without being able to connect to a public WwTW with phosphate stripping. The application of a 55% judgement, regarding the proportion of dwellings unable to be delivered, provides an estimate that 197 dwellings would have been completed if the phosphate constraint and NRW's advice had been in place since 2011.

5.3.14 Table 12 shows the total number of dwellings that it is estimated would have been completed in the riverine SAC phosphorus sensitive catchments between 2011 and 2024, if NRW's advice and the AMP7 WwTW improvements had been in place from 2011 onwards.

Table 12. Total Number of Dwellings Estimated to have been Completed in the Riverine SAC Phosphorus Sensitive Catchments between 2011 and 2024, if NRW's Advice and The AMP7 WwTW Improvements had been in Place from 2011 Onwards.

	Small	Large	Total
No of Dwellings on Sites in settlement with planned WwTW AMP7 improvements.	151	121	272
No of Dwellings outside a settlement with planned WwTW AMP7 improvements that would have met NRW's advice.	197	0	197
Totals	348	121	469

5.4 Revised Windfall Totals for Period 2011-2024

5.4.1 Table 13 details the total completions on windfall sites between 2011 and 2024, the figures exclude windfall sites that would be unlikely to come forward in the riverine SAC phosphorus sensitive catchments during the Replacement LDP period. Dwelling completions on departure sites, granted due to the lack of five-year housing supply have also been excluded. From the totals, the average number of dwelling completions on windfall sites over the thirteen-year period has been calculated.

Table 13. Total and Average Number of Dwellings Completed on Windfall Sites between 2011 and 2024 following the Removal of Dwellings unlikely to come forward in the Replacement LDP Period.

	Small	Large	Totals
Dwellings Completed excluding Departure Sites and non-compliance with NRW Riverine SAC phosphate guidance	1,018	477	1,495
Average*	78	40	118

*Note: The small sites are divided by 13 to represent the fact that there are 13 years of data whilst large sites are divided by 12 due to the omission of the 2014-2015 data.

5.5 Replacement LDP Windfall Allowance

5.5.1 To determine the anticipated windfall rate (allowance) for the Replacement LDP, the average number of windfall completions over the thirteen-year period is used, as per Table 13. The results give an anticipated windfall allowance for the Replacement LDP of 118 dwellings per annum, split between 78 dwellings on small sites and 40 dwellings on large sites.

5.5.2 To determine the overall contribution that windfall sites will make to the housing supply of the Replacement LDP, the windfall allowance needs to be considered over the remainder of the 15-year plan period (13 years, (years 1 and 2 = completions data)). For the first two years of the projected supply, the Development Plans Manual (Edition 3) states that large site windfalls should be excluded from calculations to prevent double counting. Therefore, the following calculation is used to determine the contribution that windfalls will make to the housing land supply:

Based on 118 dwellings per annum windfall allowance:

118 dwellings x 11 years = 1,298

78 dwellings x 2 years = 156

Total = 1,454 dwellings

5.5.3 The results show that the total contribution to the housing supply in the Replacement LDP, from windfall sites, is 1,454 dwellings. This is based on data from 1st April 2024 and is subject to change as the Replacement LDP progresses.

6. Housing Supply Calculation

6.0.1 Bringing together all the previous sections, the table below shows the calculations for each source of housing supply for the Powys Replacement LDP, at the base date of this background paper.

6.0.2 The main purpose of this paper, at this time, is to determine the contribution that windfall sites and Housing Commitments will make towards housing supply, so that this can be taken into consideration when considering housing growth options for the Replacement LDP.

6.0.3 Further information including on the phasing of sites and how they fit with the spatial strategy will be provided in future iterations of this paper as preparation of the Replacement LDP progresses. Information on the housing land supply for affordable dwellings is detailed in Annex 2.

Table 14. Total Replacement LDP Housing Supply - 1st April 2024

	Small Sites	Large Sites	Total
Completions (1st April 2022 – 31st March 2024)	195	408	603
Potential Housing Commitments under construction	0	656	656
Potential Housing Commitments Not Started minus non-delivery allowance (44%)	0	754	754
Projected Units on Windfall Sites (13 years remaining)	1,014	440	1,454
Total	1,209	2,258	3,467

6.0.4 Table 14 shows that the total contribution to the housing supply from windfall sites and potential Replacement LDP housing commitments equates to 3,467 dwellings. As a way of comparison, the average completion rate of new dwellings, between 2008 and 2024 (detailed in Annex 1) (excluding the 2014 -2015 monitoring year), has been 240 dwellings completed per annum, equating to 3,600 dwellings when multiplied by 15, to reflect a 15-year plan period.

7. Key Findings

The key findings from this (April 2024) iteration of the paper (key findings will be updated annually in subsequent iterations):

- Total Completions since the start of the Replacement LDP plan period equates to **603 dwellings (01/04/2022 – 31/03/2024)**.
- Following the application of a **44% non-delivery allowance**, and the removal of sites in phosphorus sensitive SAC catchments (where there are no improvements to Wastewater Treatment Works planned in a Dwr Cymru's AMP programme), a total of **1,410 dwellings** have planning permission on large sites that will be included as Housing Commitments in the Replacement LDP.
- A total of 1,958 dwellings have been completed on windfall sites during the thirteen-year period of the adopted LDP, 2011-2024. Of the 1,958 dwellings, 1,243 were on small sites with 795 on large sites. This equates to an average of 163 dwellings per year, of which 96 were on small sites and 66 on large sites.
- The windfall allowance has been calculated by considering past windfall rates, but also took into consideration why recent trends may not continue into the Replacement LDP period. This included looking at the number of units unlikely to come forward due to being within a phosphorus sensitive SAC catchment. Further consideration was also given to the impact that the lack of five-year land supply (before the LDP was adopted in 2018) had on elevating windfall numbers.
- The results give an anticipated **windfall allowance for the Replacement LDP of 118 dwellings per annum**, split between 78 dwellings on small sites and 40 dwellings on large sites. This equates to **1,454 dwellings** for the remaining 13 years of the Replacement LDP period.
- **The total housing land supply is calculated to be 3,467 dwellings** for the Replacement LDP period 2022 - 2037.
- The 3,467 dwellings can be compared to the average completion rate of new dwellings, between 2008 and 2024 (detailed in Annex 1) which has **been 240 dwellings completed per annum, equating to 3,600 dwellings when multiplied by 15, to reflect a 15-year plan period.**

Annex 1 – Past Completions

Table 15. Housing Completions over the Past Fifteen Years

Year	Monitoring Period	Total Completions
1	2008-2009	159
2	2009-2010	253
3	2010-2011	239
4	2011-2012	97
5	2012-2013	207
6	2013-2014	192
7	2014-2015	Void*
8	2015-2016	316
9	2016-2017	253
10	2017-2018	195
11	2018-2019	163
12	2019-2020	237
13	2020-2021	315
14	2021-2022	369
15	2022-2023	339
16	2023-2024	264
	Total	3,598
	Average:	240
	15yrs:	3,600

* Completion data for the 2014-2015 monitoring period has been excluded from the dataset and totals. This is due to issues with the way data was collated in that monitoring period, resulting in inconsistencies.

Source: Years 1-3 JHLAS, Years 4 -15 as published in latest Table 21A of Annual Monitoring Report.

Annex 2 – Affordable Dwellings

Table 16. Affordable Housing Completions 1st April 2011- 31st March 2024

Year	Monitoring Period	Small Sites	Large Sites	Total
1	2011-2012	5	9	14
2	2012-2013	7	91	98
3	2013-2014	11	35	46
4	2014-2015	6		
5	2015-2016	7	104	111
6	2016-2017	14	32	46
7	2017-2018	7	59	66
8	2018-2019	14	3	17
9	2019-2020	14	55	69
10	2020-2021	15	93	108
11	2021-2022	3	102	105
12	2022-2023	10	114	124
13	2023-2024	6	91	97
	Total	119	788	901
	Average	9	66*	75

*Note: The small sites are divided by 13 to represent the fact that there are 13 years of data whilst large sites are divided by 12 due to the omission of the 2014-2015 data.

Table 17. Affordable Housing Completions on Windfall Sites 1st April 2011- 31st March 2024

	Small Sites	Large Sites	Total
Totals	119	349	468
Average	9	29*	38

*Note: The small sites are divided by 13 to represent the fact that there are 13 years of data whilst large sites are divided by 12 due to the omission of the 2014-2015 data.

The results in Table 17 give an indication on the number of affordable dwellings that could be delivered on windfall sites in the Replacement LDP period. Table 17 assumes a continued trend with a windfall allowance of 38 affordable dwellings per annum, split between 9 dwellings on small sites and 29 dwellings on large sites. This is considered over the remainder of the 15-year plan period (13 years).

In accordance with the calculation used to determine the windfall allowance (paragraph 5.5.2), large site windfalls have been excluded from the first two years of the projected supply calculations to prevent double counting. Therefore, the following calculation is used to determine the contribution that windfalls sites may make to the supply of affordable housing:

Based on 38 dwellings per annum affordable dwellings windfall allowance:

38 dwellings x 11 years = 418

9 dwellings x 2 years = 18

Total = 436 dwellings

Table 18. Total Replacement LDP Affordable Housing Supply – April 2024

	Small Sites	Large Sites	Total
Completions (1st April 2022 – 31st March 2024)	16	201	217
Potential Housing Commitments under construction	0	307	307
Potential Affordable Housing Commitments Not Started minus non-delivery allowance (44%)	0	258	258
Projected Units on Windfall Sites (13 years remaining)	117	319	436
Total	133	1,086	1,218

Annex 3 – Replacement LDP Housing Commitments

Table 19. Replacement LDP Housing Commitments

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Adfa	Land adjoining Min-y-Fford, Adfa	5	0	0	Llanfair Caereinion Locality
Arddleen	Land at Bryn Perthy Arddleen	0	0	9	Welshpool and Montgomery Locality
Arddleen	Land adj Windy Ridge, Ardleen (Phase 2)	0	0	9	Welshpool and Montgomery Locality
Arddleen	Land West of Trederwen House, Arddleen	0	1	16	Welshpool and Montgomery Locality
Beguildy	Land north-west of Radnorshire Arms, Beguildy	0	9	0	Knighton and Presteigne Locality
Beulah	OS 8922, Beulah	0	5	8	Builth and Llanwrtyd Locality
Bronllys	Land at the rear of Bronllys CP School Bronllys	0	30	0	Hay and Talgarth Locality
Bronllys	Land at Bronllys to the West of Hen Ysgubor, Bronllys	10	0	0	Hay and Talgarth Locality
Bronllys	Former Bronllys CP School Bronllys	17	0	0	Hay and Talgarth Locality
Builth Road	Part of Preserved Timber Products	8	0	0	Builth and Llanwrtyd Locality
Builth Wells and Llanelwedd	Development Off Hospital Road Hospital Road, Builth Wells	81	0	0	Builth and Llanwrtyd Locality
Builth Wells and Llanelwedd	Land on Brecon Road, Builth Wells	40	0	0	Builth and Llanwrtyd Locality
Builth Wells and Llanelwedd	2 Plas Newydd Builth Wells	0	9	0	Builth and Llanwrtyd Locality
Bwlch-y-cibau	Land adj. Llwyn Derw Bwlch y Cibau	6	0	0	Llanfyllin Locality
Caesws	Plas Maldwyn Ty Gwyn Road Caesws SY17 5HA	0	0	12	Llanfair Caereinion Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Castle Caereinion	Land adjacent to Tynllan Farm Castle Caereinion	0	5	0	Welshpool and Montgomery Locality
Castle Caereinion	Land adjacent to Tynllan Farm Castle Caereinion	0	5	0	Welshpool and Montgomery Locality
Castle Caereinion	Land at Tynllan Farm, Castle Caereinion	0	9	0	Welshpool and Montgomery Locality
Castle Caereinion	Residential Development At Tynllan Farm Castle Caereinion	0	5	0	Welshpool and Montgomery Locality
Cemmaes	Land opp Glanafon	5	0	0	Machynlleth Locality
Churchstoke	Rear of Village Hall	7	3	0	Newtown Locality
Churchstoke	Adj. Fir House, Churchstoke	38	0	0	Newtown Locality
Churchstoke	Land adj to Buttercup House, Churchstoke	0	15	5	Newtown Locality
Cilmery	Site Adjacent To Belmont Cilmery	0	5	0	Builth and Llanwrtyd Locality
Clyro	Land Adjacent Clyro Court Farm, South of the Castle	15	0	0	Hay and Talgarth Locality
Clyro	Housing Development At Land Off Kilvert View Kilverts View Cleirwy	0	0	13	Hay and Talgarth Locality
Crew Green	Land Adjoining Bear House, Crew Green	2	1	5	Welshpool and Montgomery Locality
Crew Green	Land South Of Berlin Mount Crew Green	23	0	0	Welshpool and Montgomery Locality
Forden and Kingswood	Land at Pen y lan and adjacent to Woodluston Forden	5	0	0	Welshpool and Montgomery Locality
Forden and Kingswood	Residential Development At Church Farm Forden	9	0	0	Welshpool and Montgomery Locality
Forden and Kingswood	Land Adj. Lyndale And Forden C In W Primary School, Forden	23	0	0	Welshpool and

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
					Montgomery Locality
Four Crosses	Land off B4393 at Plas Foxen Four Crosses	0	0	23	Welshpool and Montgomery Locality
Four Crosses	Land 200 Meters West Of Oldfield Farm, Four Crosses	13	11	0	Welshpool and Montgomery Locality
Four Crosses	Land At Wychwood Four Crosses	12	0	0	Welshpool and Montgomery Locality
Four Crosses	Land At Gornal Farm, Four Crosses	35	0	0	Welshpool and Montgomery Locality
Gladestry	Land adjacent to Yellow Jack Barn, Gladestry	5	0	0	Knighton and Presteigne Locality
Guilfield	Land to East of Groes-lwyd, Guilfield	22	0	0	Welshpool and Montgomery Locality
Guilfield	Fairview Garage Guilfield	0	9	0	Welshpool and Montgomery Locality
Guilfield	Land At Tan Y Gaer Guilfield	28	0	0	Welshpool and Montgomery Locality
Guilfield	Enc 2200, Sarn Meadows	46	0	0	Welshpool and Montgomery Locality
Kerry	PT Encs 3186 & 4186, Dolforgan	0	0	19	Newtown Locality
Kerry	Land Adj Uchel Dre Common Road Kerry	5	0	0	Newtown Locality
Knighton	Peter Christian Site, West St, Knighton	18	0	0	Knighton and Presteigne Locality
Knighton	Site adjacent to Shirley Ludlow Road, Knighton	24	0	0	Knighton and Presteigne Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Knighton	Land At Llanshay Farm, Knighton,	103	0	0	Knighton and Presteigne Locality
Llan	Land opposite Rock Terrace, Llan, Llanbrynmair	5	0	0	Machynlleth Locality
Llanbrynmair	Bryn Coch	0	4	1	Machynlleth Locality
Llanddew	Land Opposite Village Hall, Llanddew	0	5	2	Brecon Locality
Llandewi Ystradenni	Land to Rear of Llandewi Hall, Llandewi	0	13	0	Knighton and Presteigne Locality
Llandrindod Wells	Crab Tree Green, Brookland Rd, Llandrindod Wells	50	0	0	Llandrindod and Rhayader Locality
Llandrindod Wells	Land East Of Ithon Road Ithon Road Llandrindod Powys LD1 6AS	0	79	0	Llandrindod and Rhayader Locality
Llandrindod Wells	Land at Gate Farm Llandrindod	6	0	0	Llandrindod and Rhayader Locality
Llandrindod Wells	The Manor Lindens Walk Llandrindod Wells	9	0	0	Llandrindod and Rhayader Locality
Llandrindod Wells	Land At Lakeside Avenue Lakeside Avenue Llandrindod Wells	0	69	0	Llandrindod and Rhayader Locality
Llandrinio	Land At Trawscoed And At Orchard Croft Llandrinio	48	0	0	Welshpool and Montgomery Locality
Llanfair Caereinion	Land adj Maes Gwyn, Llanfair Caereinion	9	0	0	Llanfair Caereinion Locality
Llangammarch Wells	Land Opposite Pen-y-bryn, Llangammarch	0	25	0	Builth and Llanwrtyd Locality
Llanidloes	Lower Green, Victoria Avenue	31	0	0	Llanidloes Locality
Llanidloes	Land Adj Dolwenith And Tan Y Bryn Llanidloes	96	0	0	Llanidloes Locality
Llanidloes	Former Livestock Market Gorn Road Llanidloes	0	0	22	Llanidloes Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Llanigon	Land south of Willow Glade, Llanigon	0	0	23	Hay and Talgarth Locality
Llanrhaeadr-ym-Mochnant	Land adj Byrnderw, Park Street, Llanrhaeadr Y M	3	1	1	Llanfyllin Locality
Llansantffraid-ym-Mechain	Land adj 'Cranford', Llansantffraid - Ym – Mechain	3	5	1	Llanfyllin Locality
Llansantffraid-ym-Mechain	Land adj Parc Bronydd, Llansantffraid ym Mechain	4	2	0	Llanfyllin Locality
Llansantffraid-ym-Mechain	Land next to P37 HA2, Llansantffraid	0	0	13	Llanfyllin Locality
Llansantffraid-ym-Mechain	(Named: Maes Y Cledrau) Development At Dyffryn Foel (Llansantffraid) Llanfyllin P	0	0	13	Llanfyllin Locality
Llansilin	Opp. Wynnstay Arms (5/055) -	0	0	23	Llanfyllin Locality
Llanwnnog	Rear of 2700, Llanwnnog, Newtown	7	0	0	Llanfair Caereinion Locality
Llanwnnog	Land adj Church House Farm Llanwnnog	5	0	0	Llanfair Caereinion Locality
Llanwrtyd Wells	OS 1451 Meadow View, Station Road	5	1	10	Builth and Llanwrtyd Locality
Llanwrtyd Wells	OS 2664 Caemawr, off Ffos Road	14	3	0	Builth and Llanwrtyd Locality
Llanyre	Land between Moorlands and Llyr Llanyre	0	14	0	Llandrindod and Rhayader Locality
Machynlleth	Travis Perkins Trading Co Ltd Heol Y Doll Machynlleth	15	0	0	Machynlleth Locality
Manafon	Land adjoining Trem Hirnant, Manafon	5	0	0	Llanfair Caereinion Locality
Manafon	Land Adjoining Trem Hirnant Manafon	5	0	0	Llanfair Caereinion Locality
Middletown	PT OS 0036 & 0041, West of Golfa Close, Middletown	16	0	0	Welshpool and Montgomery Locality
Middletown	Land Adjoining The Fron	25	0	0	Welshpool and Montgomery Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Middletown	Old Coal Depot Middletown Welshpool	8	0	0	Welshpool and Montgomery Locality
Middletown	Land Adjacent West Of Penyfoel Middletown Welshpool	8	0	0	Welshpool and Montgomery Locality
Montgomery	Land Off Forden Road Montgomery	0	0	33	Welshpool and Montgomery Locality
Newtown	PT Enc0042/1463/1658/2053/2864, Rock Farm Llanllwchaiarn	2	1	5	Newtown Locality
Newtown	Newtown Bowling Club Back Lane, Newtown	0	0	26	Newtown Locality
Newtown	Land to the south of A489 West of Mochdre Brook, Newtown	23	16	21	Llanidloes Locality
Newtown	Land to the north of A489 west of Mochdre Brook, Newtown	30	0	0	Llanidloes Locality
Newtown	Land at Severn Hts, Brimmon Close, Newtown	0	23	0	Newtown Locality
Newtown	Land At Rock Farm Newtown	5	0	0	Newtown Locality
Newtown	Land Off Garth Owen Glandwr Newtown	14	0	0	Newtown Locality
Newtown	Former Red Dragon Public House & Newtown Youth Centre, Newtown	0	0	18	Newtown Locality
Newtown	Land At Former Travis Perkins Site New Road Newtown	0	34	0	Newtown Locality
Newtown	Robert Owen House Park Lane Newtown	32	0	0	Newtown Locality
Newtown	31 Market Street, Extending Over 30 Market Street And The Building To The Rear Of No 31 Newtown	2	3	0	Newtown Locality
Newtown	Land South Of Llanidloes Road, Newtown	8	0	0	Llanidloes Locality
Norton	Land at Orchards End & Jacks View Norton	0	10	2	Knighton and Presteigne Locality
Norton	Development land off Will's View, Norton	8	1	0	Knighton and Presteigne Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Pen-y-bont Llanerch Emrys	Haulage Depot The Old Station Yard, Pen y Bont	0	0	5	Llanfyllin Locality
Pontrobert	Land adj Pant-y-Ddafad Pontrobert	9	0	0	Llanfyllin Locality
Presteigne	Joe Deakins Road Site, Presteigne	35	0	0	Knighton and Presteigne Locality
Rhayader	St harmon Road North, Rhayader	0	17	0	Llandrindod and Rhayader Locality
Rhayader	Tir Gaia, Rhayader	4	1	0	Llandrindod and Rhayader Locality
Rhayader	Site adj to Tir Gaia, Abbey Cwm Hir Road, Rhayader	0	9	0	Llandrindod and Rhayader Locality
Rhosgoch	Development at Old Inn Rhosgoch, Builth Wells	10	0	0	Hay and Talgarth Locality
Sarn	Land Opposite Oak View, Sarn	0	27	18	Newtown Locality
Trefeglwys	Pt Enclosure 7847 Phase 3, Trefeglwys	0	0	6	Llanidloes Locality
Tregynon	Land adjacent Tyn y Ddol, Tregynon	3	1	1	Llanfair Caereinion Locality
Trewern	Land at Gate Farm, Criggion Lane, Trewern	0	9	0	Welshpool and Montgomery Locality
Trewern	Land To The East Of Trewern School Trewern	40	0	0	Welshpool and Montgomery Locality
Trewern	Land Adjoining The Wallers Trewern Welshpool	17	0	0	Welshpool and Montgomery Locality
Welshpool	Burgess Land, Redbank (A/45/005)	25	0	0	Welshpool and Montgomery Locality
Welshpool	Land At Lansdowne House And William Ainge Court Chapel Street / Bowling Green Lane	0	0	15	Welshpool and Montgomery Locality

Settlement	site name	N/S 2024	U/C 2024	Complete 2022-2024	Locality / Housing Market Area
Welshpool	Neuadd Maldwyn, Severn Road, Welshpool	0	66	0	Welshpool and Montgomery Locality
Ystradgynlais Area	Land at Bryn y Groes, Cwmgiedd, Ystradgynlais	56	53	8	Ystradgynlais Locality
Ystradgynlais Area	Land at Former Cynlais School Playing Field Ystradgynlais	0	11	0	Ystradgynlais Locality
Ystradgynlais Area	Penrhos CP School, Brecon Road, Ystradgynlais	42	0	0	Ystradgynlais Locality
Ystradgynlais Area	Land At Brecon Road Ystradgynlais	0	21	5	Ystradgynlais Locality
Ystradgynlais Area	Land At 89 Gorof Road Lower CWMTWRCH	0	0	8	Ystradgynlais Locality
Ystradgynlais Area	Pont Aur Ystradgynlais	0	10	0	Ystradgynlais Locality