

Public Document Pack

Cabinet

Meeting Venue
Hybrid meeting - Zoom - County Hall

Meeting date
Tuesday, 11 October 2022

Meeting time
10.00 am

For further information please contact
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County Hall
Llandrindod Wells
Powys
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5/10/2022

Mae croeso i chi siarad yn Gymraeg neu yn Saesneg yn y cyfarfod.
Rhowch wybod pa iaith rydych am ei defnyddio erbyn hanner dydd, ddau ddiwrnod gwaith cyn y cyfarfod.
You are welcome to speak Welsh or English in the meeting.
Please inform us of which language you wish to use by noon, two working days before the meeting.

AGENDA

1.	APOLOGIES
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To receive apologies for absence.

2.	MINUTES
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To authorise the Chair to sign the minutes of the last meeting held as a correct record.

(Pages 5 - 8)

3.	DECLARATIONS OF INTEREST
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To receive any declarations of interest from Members relating to items to be considered on the agenda.

4.	TRANSFORMING EDUCATION PROGRAMME - YSGOL BRO HYDDGEN CAPITAL PROJECT
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To consider a report by County Councillor Pete Roberts, Cabinet Member for a Learning Powys.

(Pages 9 - 122)

5.	ADOPTION OF ECO4 FLEX IN POWYS
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To consider a report by County Councillor Matthew Dorrance, Deputy Leader and Cabinet Member for a Fairer Powys.

(Pages 123 - 142)

6.	RENTING HOMES (WALES) ACT 2016 - TENANCY TERMS FOR NEW TENANTS
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To consider a report by County Councillor Matthew Dorrance, Deputy Leader and Cabinet Member for a Fairer Powys.

(Pages 143 - 146)

7.	ASSET MANAGEMENT STRATEGY
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To consider a report by County Councillor Jake Berriman, Cabinet Member for a Connected Powys.

(Pages 147 - 162)

8.	APPROVAL OF THE POWYS LOCAL DEVELOPMENT PLAN ANNUAL MONITORING REPORT 2022 FOR SUBMISSION TO WELSH GOVERNMENT
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To consider a report by County Councillor Jake Berriman, Cabinet Member for a Connected Powys.

(Pages 163 - 410)

9.	ANNUAL INFORMATION GOVERNANCE REPORT 2021-2022
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To consider a report by County Councillor Jake Berriman, Cabinet Member for a Connected Powys.

(Pages 411 - 424)

10.	FORWARD WORK PROGRAMME
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To consider the Cabinet forward work programme.

(Pages 425 - 426)

11.	EXEMPT ITEMS
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The Monitoring Officer has determined that category 3 of the Access to Information Procedure Rules applies to the following items. His view on the public interest test (having taken account of the provisions of Rule 14.8 of the Council's Access to Information Rules) was that to make this information public would disclose information relating to the financial or business affairs of any particular person (including the authority holding that information).

These factors in his view outweigh the public interest in disclosing this information. Members are asked to consider these factors when determining the public interest

test, which they must decide when considering excluding the public from this part of the meeting.

12.	CHILDREN'S PLACEMENTS
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To consider a report by County Councillors Sandra Davies and Susan McNicholas, Cabinet Members for Future Generations.

(Pages 427 - 464)

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**MINUTES OF A MEETING OF THE CABINET HELD AT COUNTY HALL / ZOOM ON
TUESDAY, 27 SEPTEMBER 2022**

PRESENT

County Councillor J Gibson-Watt (Chair)

County Councillors J Charlton, R Church, S Cox, S Davies, P Roberts, D Selby and D Thomas

In attendance: County Councillor A Davies

1.	APOLOGIES
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Apologies for absence were received from County Councillors J Berriman, M Dorrance and S McNicholas.

2.	MINUTES
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The Leader was authorised to sign the minutes of the last meeting held on 26 July 2022 as a correct record.

3.	DECLARATIONS OF INTEREST
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There were no declarations of interest reported.

4.	TRANSFORMING EDUCATION PROGRAMME - SENNYBRIDGE C.P. SCHOOL OUTLINE BUSINESS CASE (OBC)
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Cabinet was asked to consider approving the submission of an Outline Business Case (OBC) to the Welsh Government's Sustainable Communities for Learning Programme for investment to develop a new 150 place dual stream primary school to replace Sennybridge C.P. School's current building.

The cost was estimated to be £11,154,341, to be funded 65% by Welsh Government and 35% by the Council. The Council's contribution would be funded from borrowing. Cabinet noted that although the cost of this borrowing to the Council's revenue budget was estimated at £160,000 per year for 34 years, there was no guarantee that these costs would not increase given the volatility of financial markets. Cabinet was advised that alternative sources of funding were being looked at.

The Cabinet Member for a Learning Powys advised that a new build with a high energy standard would remove the on-going maintenance costs associated with the current school, would reduce running costs due to the Passivhaus element, and would provide an improved learning environment for pupils and staff.

County Councillor Aled Davies speaking as the leader of the opposition suggested that the Welsh Government intervention rate should be higher given

the higher building costs in rural areas and asked whether there was an opportunity to designate the school as Welsh Medium school. The Cabinet Member for Finance and Transformation agreed that the intervention rate should be higher but said this should be part of a broader discussion on the rural costs analysis. Cabinet was advised that the intention was to move the school along the Welsh Medium continuum and that the intake in the Welsh reception stream was higher than the English stream.

RESOLVED to submit an Outline Business Case (OBC) to the Welsh Government's Sustainable Communities for Learning Programme (formerly the 21st Century Schools Programme) for investment to develop a new 150 place dual stream primary school to replace Sennybridge C.P. School's current building.

5. FINANCIAL PLANNING UPDATE

Cabinet noted that the MTFS needed to be updated to reflect the changing economic climate and the additional financial burden on the Council. This would increase the budget gap over the life of the plan and would need to be resolved by either generating additional income or reducing costs. The MTFS assumed 2% inflation non pay uplifts with some external contract uplifts identified as pressures and funded to CPI or other contract terms, but with inflation currently at 10.1% and set to rise further the assumptions currently used in the Strategy needed to be revisited.

The revised Financial Resource Model (FRM) was being challenged by the Senior Leadership Team before being included in the updated Medium Term Financial Strategy. The Senior Leadership Team had been asked to review their Integrated Business Plans identifying service specific pressures but also proposing ways to reduce expenditure, increase income or make savings. The report set out the strategies that would be used to address the budget gap.

RESOLVED

- 1. That Cabinet acknowledge the changing environment in which our plans are being developed and agree with the revised assumptions that are being used to support the development of the MTFS; and that work will continue to update and refresh the MTFP as appropriate.**
- 2. To agree the budget principles set out in the MTFS to bridge the budget gap over the next 5 years.**
- 3. To agree that the Senior Leadership Team continues to work with the relevant Portfolio Cabinet Member(s) to identify potential savings to assist in addressing the indicative budget gap across the period of the Medium Term Financial Plan.**
- 4. To delegate to the Chief Executive, in agreement with the Leader and Cabinet Member for Finance, the authority to**

implement any saving proposal in advance of 2023/24 where no policy recommendation is required.

- 5. This report is presented to Finance Panel for their scrutiny and feedback.**

6.	TREASURY MANAGEMENT QUARTER 1 REPORT
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Cabinet noted the Treasury Management report for quarter 1.

7.	DELEGATED DECISIONS TAKEN SINCE THE LAST MEETING
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Cabinet noted the delegated decisions taken by Cabinet members since the last meeting.

8.	FORWARD WORK PROGRAMME
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Cabinet noted the forward work programme.

**County Councillor J Gibson-Watt
Chair**

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CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE
Date 11 October 2022**

REPORT AUTHOR: County Councillor Pete Roberts
Portfolio Holder for a Learning Powys

REPORT TITLE: Transforming Education Programme – Ysgol Bro
Hyddgen Capital Project

REPORT FOR: Decision

1. Purpose

- 1.1 This report seeks Cabinet approval to submit a new Strategic Outline Case/Outline Business Case (SOC/OBC) to develop a new all-age school building for Ysgol Bro Hyddgen, Machynlleth. This SOC/OBC replaces the previous version that was approved by Cabinet in September 2020, and the preferred option no longer includes leisure facilities. These will continue to be provided from Bro Ddyfi Leisure Centre.
- 1.2 The new preferred option is to build a new 540-place all-age school in Machynlleth to replace the current Ysgol Bro Hyddgen primary and secondary phase buildings. It will also incorporate early years facilities, a community room that can be used after hours, and an additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch. The design could also include a space for a public library if that is required.
- 1.3 The estimated cost of the new preferred option is as outlined in the table below. The project will be funded jointly by Welsh Government and Powys County Council (PCC) as outlined below. Whilst it is the intention to mitigate the optimism bias and risk as far as possible, due to the current project stage and economic climate, these costs must remain in the project finances at this early stage. The funding is allocated for this project in the Council's Band B 21st C Schools Programme.

Project Costs	
Capital Cost	£40,595,351
Optimism Bias	£5,277,396
Risk	£3,247,628
VAT (only to be included where non-recoverable by applicant)	N/A
Total Project Cost: inclusive of optimism bias and risk.	£49,120,375
Total: Whilst it is the intention to mitigate the optimism bias and risk as far as possible, due to the current project stage and economic climate, these costs must remain in the project finances at this early stage.	

Funding allocations	
Welsh Government contribution 65%	£31,374,054
PCC 35%	£16,893,721
PCC 100% (Off-site highways works – see Section 4.4)	£852,600
Total	£49,120,375

1.4 This compares with a revised estimated cost for the integrated campus model, including school, leisure, and library, of £66m, which is no longer affordable within the Council's Sustainable Communities for Learning Programme (previously known as 21st C Schools Programme) funding envelope.

1.5 This report is supported by the following appendices:

- Appendix A: New Strategic outline Case/Outline Business Case
- Appendix B: Integrated Impact Assessment

2. Background

2.1 The Council has recently relaunched its Strategy for Transforming Education in Powys, which includes an intention to develop all-age schools in the 13 geographic localities in Powys, underpinned by a major capital investment programme. However, prior to the development of the new Strategy, the transformation of education in the Machynlleth catchment area had started in 2012 with a catchment area review.

2.2 There have been three stages to the transformation of education in the area:

- 2014 – the establishment of Ysgol Bro Hyddgen as an all-age school for pupils aged 4 – 18, following the merger of Ysgol Bro Ddyfi and

Machynlleth C.P. School. The school operates across two sites in the town of Machynlleth.

- 2017 onwards – plans to develop a new school building began, with the intention to bring both primary and secondary phases onto one site, along with early years provision.
- 2021 – following a period of consultation, Cabinet agreed to change the school's language category from dual-stream to Welsh-medium, on a phased basis starting in September 2022.

2.3 This report focuses on the plans to develop a new school building.

2.4 Having developed designs for a new all-age school, the project was impacted by the collapse of the design and build contractor in 2019, when Dawnus Construction Ltd. went into administration. The project was at RIBA 4 full design stage, and the planning application had been submitted to the planning authority. Construction had not yet started on site.

2.5 Following this, officers were requested to reconsider the plans to see if it was feasible to include leisure and library provision, as well as early years and education provision, due to the ongoing revenue implications for the Council from running another two Council buildings in the town – Bro Ddyfi Leisure Centre and Machynlleth Town Library.

2.6 The outcome of this work was that an integrated community campus model, including leisure and library, became the preferred option with a cost estimate of £48m at that time, which included optimism bias and risk. A second SOC/OBC was approved by Cabinet and Welsh Government in autumn 2020.

2.7 The integrated community campus model was then further developed to RIBA 3 design stage. At this point, the Bro Hyddgen Project Board requested that further work was undertaken to try to reduce the costs of the project. This focused on:

- Reducing areas within the scheme
- Reducing the number of pupil places from 620 to 540, based on revised pupil projections in the area
- Reviewing energy requirements to see whether the current design could achieve carbon zero in operation, as the scheme had been designed to Passivhaus standard
- Updating condition assessments for both Bro Ddyfi Leisure Centre and Machynlleth Town Library to understand cost implications of maintaining/improving the current buildings.

2.8 A cost review was also undertaken because the original cost estimates were based on 2020 figures - there has been significant construction industry inflation because of both Covid and the invasion of Ukraine. This review indicated that the community campus model was projected to be in

the region of £66m, inclusive of optimism bias and risk, which meant that it was not affordable within the Council's Band B Sustainable Communities for Learning Programme (previously known as 21st C Schools Programme), which totals approximately £113m. To date, just over £59m has been allocated to support the development of other school building projects, which means that there is currently £54m remaining in the budget. The implication of this was that additional funding would need to be found outside this budget, and there would be no flexibility within the Band B funding envelope to support other school projects.

2.9 At this point, it was necessary to re-evaluate options and a new preferred option emerged, which is for a new all-age school building, with early years, community facilities and a potential area for library, should that be required in future. The cost of this option is £49,120,375, including risk and optimism bias. This figure is based on projections to the mid-point of construction in July 2025* using Building Construction Information Service Construction Indices (BCIS) and Tender Price Indices (TPI). *Note: The date is subject to procurement route and necessary approvals.

2.10 The building has already been designed to achieve Passivhaus energy standard and these pre-dates the current Welsh Government Net Zero Carbon requirements. A carbon assessment of the integrated community campus project was undertaken, and it became apparent that significant challenges existed due to the energy demand of the swimming pool. Achieving Net Zero Carbon on the new preferred option without the addition of leisure facilities is more attainable and will be targeted. This will enable the Council to draw down additional funding from Welsh Government.

2.11 The updated condition survey for Bro Ddyfi Leisure Centre, carried out in spring 2022, suggests that £3.5m is required for maintenance of the Centre over the next ten years, but that any major refurbishment is estimated to require around £6m, dependent on the nature of the refurbishment. The maintenance costs for Machynlleth Town Library based on a condition survey undertaken in June 2022 indicates that £55,000 is required for maintenance works.

2.12 The estimated sale value of the various buildings are as follows (these figures have been included in the business case):

- Machynlleth Primary School – £431,000
- Machynlleth Town Library - £120,000

3. Advice

3.1 It is recommended that a new SOC/OBC is approved for submission to the Welsh Government based on a **new preferred option** to build a 540-place all-age school in Machynlleth to replace the current Ysgol Bro Hyddgen primary and secondary phase buildings. It will also incorporate early years facilities, a community room, and an additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch.

The design could also include a space for a public library if that is required. The reasons for this are as follows:

- This scheme is affordable within the Council’s Sustainable Communities for Learning Programme Band B funding envelope and frees up further funding to be utilised on other school projects.
- The estimated costs are lower than the original costs of the community campus, and significantly lower than the updated projected costs of that model.
- If approved by the Welsh Government, the Council can then commence the procurement process to appoint a Design and Build contractor and progress to full business case stage.
- Welsh Government intervention rate for Band B programme is 65%, which represents good value for money for the Council.
- Provides an opportunity to draw down additional funding from the Welsh Government from achieving carbon zero in operation.

3.2 It is also recommended that the Council seeks additional funding from alternative sources to maintain/upgrade Bro Ddyfi Leisure Centre and the Town Library, if required.

4. Resource Implications

4.1 Financial Capital:

Project Costs	
Capital Cost	£40,595,351
Optimism Bias	£5,277,396
Risk	£3,247,628
VAT (only to be included where non-recoverable by applicant)	N/A
Total Project Cost (inclusive of optimism bias and risk)	£49,120,375
Welsh Government Contribution (65%)	£31,374,054
PCC Contribution (35%)	£16,893,721
PCC Contribution (100%) (Off-site highways works - see Section 4.4)	£852,600

4.2 The project can be accommodated within the current Sustainable Communities for Learning Programme funding envelope.

4.3 Financial Revenue:

- 4.3 The Council's contribution towards this scheme will be funded from borrowing as no other funding has been identified. The cost to the Council's revenue budget because of this borrowing is estimated at £800,000 per year for 60 years. This can be accommodated within the borrowing budgets over the next five years, whilst borrowing in the medium term may require increased budgets, depending on the future borrowing rates and level of demand.
- 4.4 The current Sustainable Communities for Learning grant conditions allow Welsh Government to claw back grant if the school has over 15% surplus capacity 5 years after occupation of the school. The capacity of the planned new building, at 540 places, is slightly higher than the current pupil numbers (current school projections range from 465 to 475 including 6th form pupils) so this is a potential risk to the scheme if pupil numbers fall below 459.
- 4.5 The attached OBC identifies that an estimated increase in the recurring revenue cost of funding the school through the funding formula of between £66,000 and £76,000 (depending on the option) which is made up of a potential increase in rates charges (approx. £40,000) of a new build school with the remainder due to a larger gross internal floor area in the new school to accommodate early years, community and library space, dependant on option. Any change to the formula funding provided will impact on the Council's revenue budget unless found within the existing budget envelope for schools delegated funding.
- 4.6 Even though there's a potential additional annual revenue cost to a new build school in Machynlleth, a new build with a high energy standard would reduce the on-going maintenance costs associated with the current school and utilities-related running costs due to the Passivhaus element and would provide an improved learning environment for pupils and staff more suitable for the needs of the new Curriculum for Wales. The whole-life costs of continuing with the current schools' estate in Powys (the Status Quo / "Do Minimum" option) were compared with the costs of a fully implemented transformation of the schools estate, over 60 years, including those of this project, with the result being more favourable in terms of a transformed schools estate.
- 4.7 Development and implementation of the recommendation would require involvement from several service areas, including staff from the Schools Service, Finance, Property, Highways, and ICT.
- 4.8 **Impact on balance sheet**
- Once the construction of this school is completed it will result in balance sheet asset addition of £40,595,351.
- 4.9 **Overall affordability and funding support**

The Council seeks support from Welsh Government to fund this scheme. The Sustainable Communities for Learning Band B Programme intervention rate is 65%, and PCC are required to fund 35% of the costs.

The Council sets its Prudential Indicators, under the Prudential Code, based on making prudent and affordable decisions and the 21st Schools' project were included in these indicators. The annual cost for the project is £844,000 based on the spend profile above and a 50-year life.

The new all-age school will be constructed on the existing Bro Hyddgen secondary school site playing fields. The old buildings will be demolished to make room for a new car park and MUGA. The demolition costs are included within the funding envelope and are eligible programme expenditure.

The project will involve off-site highways and access works, which are not eligible Sustainable Communities for Learning Programme expenditure and will be 100% Powys County Council funded. The estimated costs (including risk and optimism bias) are £852,600. These costs are included within the overall project envelope costs but are not included within the capital programme at this stage. It is anticipated that these costs will be incurred during 2025/26 financial year.

4.10 **Procurement:**

"The project will be procured under the new SEWSCAP3 framework. Appropriate bonds and collateral warranties will be obtained, and contract signed prior to commencement. The contractor will also be required to secure a Project Bank Account as a condition of the contract".

There are currently three options for the programme to deliver the scheme, each differing on the key dependency of when the scheme is tendered. This could potentially occur at three different junctures along the RIBA stage process (end of RIBA 2, 3 or 4), with each option offering different advantages and disadvantages to the overall scheme. Project completion dates could vary between the summer of 2026 and early 2027, dependent on the agreed procurement route.

- 4.11 The Deputy Head of Finance notes the content of the report and the resource implications set out above. The overall project is within the Band B funding envelope and the submission of a bid to Welsh Government is supported. There may be additional revenue running costs of the new building, but the Passivhaus standard will also drive savings to minimise the requirement for additional funding. The sale of two assets is an essential part of the Asset Strategy and supports delivery of the future capital programme.

4.12 **Strategic Property comments:**

Strategic Property note the proposals within the Report and will continue to support with regards land negotiations and other resources as required.'

8. Legal implications

- 8.1 The Head of Legal Services and the Monitoring Officer has commented as follows: " I note the legal comment and have nothing to add to the report".

9. Data Protection

Data Protection Officer comments: "This proposal does not involve the processing of personal data at this stage. However, when the project progresses to construction and transitioning, then data protection legislation must be complied with."

10. Comment from local member(s)

Cllr Michael Williams: *I fully support the paper and understand the rationale behind the change in scope. I'm supportive of the leisure facility operating from its current location and welcome investment for the facility to continue. I welcome engagement with the community regarding the Library provision and the decision surrounding its future.*

11. Impact Assessment

An integrated impact assessment has been carried out and is attached as Appendix B. It concludes that

'the Bro Hyddgen all-through school with early years and a library facility presents PCC with an opportunity to establish an energy efficient building which supports, strengthens, and broadens Welsh medium provision by improving the breadth of Welsh medium options at all key stages and ensuring stronger transition and progress for pupils. The proposal would provide improved, fit for purpose, innovative specialist facilities for the children, young people, and wider community of North West Powys. The scheme will provide the best possible opportunities to all learners in the area, enabling them to reach their full potential.'

The impact assessment consistently scores 'very good' in meeting council priorities, the wellbeing of future generations goals, and meets the council's key guiding principles. The project will promote health and wellbeing by establishing state of the facilities and will put equal emphasis on physical and mental wellbeing. The project is also ground-breaking in supporting Welsh Government's carbon neutral agenda, with the building aiming to achieve both BREEAM Excellent, Passivhaus accreditation and Net Zero Carbon in Operation. The energy

considerations of the scheme ensure that PCC is committed to ensuring a sustainable and environmentally conscious model of delivering buildings to support its residents

12. Recommendation

12.1 The following actions are recommended:

- a) To approve the new SOC/OBC for submission to the Welsh Government based on a new preferred option to build a 540-place all-age school in Machynlleth to replace the current Ysgol Bro Hyddgen primary and secondary phase buildings. It will also incorporate early years facilities, a community room that is available after hours, and an additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch. The design could also include a space for a public library, if that is required. The reasons for this are as follows:
 - This scheme is affordable within the Council's Sustainable Communities for Learning Programme Band B funding envelope, and frees up further funding to be utilised on other school projects.
 - The estimated costs are lower than the original costs of the community campus, and significantly lower than the updated projected costs of that model
 - If approved by the Welsh Government, the Council can then commence the procurement process to appoint a Design and Build contractor and progress to full business case stage.
 - Welsh Government intervention rate for Band B programme is 65%, which represents good value for money for the Council.
 - Provides an opportunity to draw down additional funding from the Welsh Government from achieving carbon zero in operation.
- b) To approve the revised off-site highways cost of £852,600 and to include in the Capital Programme. These costs are not eligible Sustainable Communities for Learning Programme expenditure and will be 100% Powys County Council funded.
- c) That the Council seeks additional funding from alternative sources to support leisure centres across the county, including Bro Ddyfi Leisure Centre.
- d) That a period of public engagement is undertaken to understand the views of the community about relocating Machynlleth Library to the new build school.

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Corporate Director: Lynette Lovell/Emma Palmer

CABINET REPORT TEMPLATE VERSION 7

**Combined Strategic Outline
Case and Outline Business
Case:**



Ysgol Bro Hyddgen

25th August 2022

Version: Final draft



Contents

Figures	5
Tables	6
1 Executive Summary	8
1.1 Introduction	8
1.2 Project Background	8
2 Strategic Case	11
2.1 Strategic Fit	12
2.1.1 National Strategies	12
2.1.2 Local Strategies	12
2.2 Case for Change	13
2.2.1 Investment Objectives	13
2.2.2 Targets and measures	13
2.2.3 Problems with the status quo - School	18
2.3 Welsh Medium Education	19
2.4 ALN provision	19
2.5 Childcare/Nursery Provision	20
2.6 Active Travel	20
2.7 Community Facilities	21
2.8 Equalities Impact Assessment & Children’s Rights Assessments	21
2.9 Net Zero Carbon and the Environment	22
2.10 Main Benefits	22
2.11 Main Risks	28
2.12 Project Constraints	28
2.13 Project Dependencies	29
3 Economic Case	30
3.1 Critical Success Factors	30
3.2 Long List Options	31
3.3 Scope Appraisal	31
3.3.1 Options	31
3.3.2 Advantages and Disadvantages	31

3.3.3	Conclusion.....	34
3.4	Service Solution Appraisal.....	35
3.4.1	Options	35
3.4.2	Advantages and Disadvantages.....	36
3.4.3	Conclusion.....	43
3.5	Service Delivery Appraisal.....	44
3.5.1	Options	44
3.5.2	Advantages and Disadvantages.....	44
3.5.3	Conclusion.....	45
3.6	Implementation Appraisal	46
3.6.1	Options	46
3.6.2	Advantages and Disadvantages.....	46
3.6.3	Conclusion.....	47
3.7	Funding Appraisal.....	48
3.7.1	Options	48
3.7.2	Advantages and Disadvantages.....	48
3.7.3	Conclusion.....	49
3.8	Summary of appraisals.....	50
3.9	Economic Appraisal	52
3.9.1	Net Present Cost	52
3.9.2	Economic Ranking	54
3.9.3	Monte Carlo Simulation	54
3.10	Qualitative Benefits Appraisal.....	56
3.11	Risk Appraisal.....	57
3.12	The Preferred Option.....	60
4	Commercial Case.....	62
4.1	Procurement Method	62
4.1.1	Procurement Strategy	62
4.1.2	Award methodology.....	64
4.2	Required Services	65
4.2.1	The required service streams:.....	65

4.2.2	The specification of required outputs:	65
4.3	Project Bank Accounts (PBAs)	66
4.4	Community Benefits	68
4.4.1	Agreed schedule	68
4.4.2	Delivery of agreed targets	68
5	Financial Case	69
5.1	Project Summary Costs.....	69
5.2	Breakdown of Capital Costs	69
5.3	Cost Template	70
5.4	Impact on the Organisation's income and expenditure account.....	71
5.5	Cost Build Up.....	72
5.6	Overall Affordability and Balance Sheet Impact	73
6	Management Case	74
6.1	Programme Management Arrangements	74
6.2	Project Management Arrangements	75
6.2.1	Project Structure.....	75
6.2.2	Project Deliverables	77
6.2.3	Outline Project Plan.....	78
6.2.4	Benefits Realisation.....	79
6.3	Risk Management.....	79
6.4	Change and Contract Management	80
6.5	Gateway Reviews.....	80
6.6	Post Project Evaluation	80
6.6.1	Post Implementation Review (PIR)	80
6.6.2	Project Evaluation Reviews (PERs)	80
6.7	Contingency Plans.....	80
7	Appendix	81
7.1	Appendix A – Ysgol Bro Hyddgen Impact Assessment.....	81

Figures

Figure 1: Location of School in relation to the town.....	15
-----------------------------------------------------------	----

Figure 2: Secondary School Campus.....	16
Figure 3: Primary School Campus	16
Figure 4: Probability Density Function	55
Figure 5: Cumulative Distribution Function	55
Figure 7: PBA money route	67
Figure 8: Programme Vision (to be updated once new CIP is published)	74
Figure 9: Transforming Education Programme Governance	75
Figure 10: Project Structure	76
Figure 11: Product breakdown structure	77

Tables

Table 1 – Targets and Measures	13
Table 2 – Summary Information	17
Table 3 – Present & forecast pupil numbers	17
Table 4 – Number of surplus places.....	17
Table 5 – Latest condition assessments (2016).....	17
Table 6 - Backlog Maintenance Costs.....	18
Table 7 – Benefits by Stakeholder.....	22
Table 8 – Strategic Risks and Countermeasures	28
Table 9 – Scope advantages and disadvantages.....	31
Table 10 – Scope appraisal summary	34
Table 11 – Service solution advantages and disadvantages.....	36
Table 12 – Service Solution appraisal summary	43
Table 13 – Service delivery advantages and disadvantages.....	44
Table 14 – Service Delivery appraisal summary	45
Table 15 – Implementation advantages and disadvantages	46
Table 16 – Implementation appraisal summary.....	47
Table 17 – Funding advantages and disadvantages.....	48
Table 18 – Funding appraisal summary	49
Table 19 – Long List Summary	50
Table 20 – Economic Appraisal	52
Table 21 – Revenue Components	53
Table 22 – Economic Summary.....	54
Table 23 - Benefit Group Weighting	56



Table 24 – Benefits Appraisal.....	57
Table 25 – Risk Appraisal	58
Table 26 – Final Appraisal Scores	60
Table 27 – Risk category.....	66
Table 28 – Key metrics.....	69
Table 29 – Breakdown of capital costs.....	69
Table 30 – Elemental Breakdown.....	70
Table 31 – Impact on the organisation’s income and expenditure account.....	71
Table 32 – Cost builds up.....	72
Table 33 – Programme Team	75
Table 34 – Project team	76
Table 35 – Project Plan, tender end of RIBA stage 2	78
Table 36 – Project Plan, tender end of RIBA stage 3	78
Table 37 – Project Plan, tender end of RIBA stage 4	78
Table 38 – Proposed Benefits Realisation Plan Structure	79

1 Executive Summary

1.1 Introduction

The purpose of this combined Strategic Outline Case (SOC) and Outline Business Case (OBC) is to present the case for investment of a project that seeks to deliver a new build 540 place all age school in Machynlleth to replace the current Ysgol Bro Hyddgen primary and secondary phase buildings

The scheme will include early years facilities, a 210-place primary phase, a 330-place secondary phase, a community room and an additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch.

The cost of the preferred option **including optimism bias and early-stage risk** is estimated to be **£49,120,375**:

Project Costs	
Capital Cost	£40,595,351
Optimism Bias	£5,277,396
Risk	£3,247,628
VAT (only to be included where non-recoverable by applicant)	N/A
Total Project Cost (inclusive of optimism bias and risk)	£49,120,375
Total (It is assumed that optimism bias and risk will be fully mitigated and that the capital build cost is the actual cost upon which the intervention rate will apply.)	

The project will be funded jointly by Welsh Government and Powys County Council (PCC) as follows:

Welsh Government contribution 65%	£31,928,244
PCC 35%	£17,192,131
Total	£49,120,375

With a design and build model using the highest environmental Passivhaus standards, the new school will act as a beacon project for environmental excellence within this area of the County. Enabling pupils at the school to gain a greater degree of insight into the latest technological developments to reduce emissions generated by infrastructure projects, and their ongoing carbon footprint. Incorporating these cutting-edge environmental design technologies will also enable the school to substantially reduce its energy costs, with schemes elsewhere demonstrating reductions in utilities expenditure of between 50 and 80%. This will

provide a considerable cash saving for the school helping to support its long-term financial sustainability.

Building a new school in Machynlleth will also eradicate backlog maintenance costs of nearly £5.5m.

1.2 Project Background

On 14 April 2020, the Council approved the new Strategy for Transforming Education in Powys 2020-30. The new Strategy outlines four strategic aims:

- Strategic Aim 1: We will improve learner entitlement and experience
- Strategic Aim 2: We will improve learner entitlement and experience for post-16 learners
- Strategic Aim 3: We will improve access to Welsh-medium provision across all key stages
- Strategic Aim 4: We will improve the provision for learners with SEN/ALN

The Council's intention is to develop, within the 13 secondary school localities, an infrastructure of all-age schools. Initially, these may be multi-sited all-age schools, however, the ultimate aim is to develop new purpose-built schools that will not only provide state of the art facilities for teaching and learning, but also childcare and early years provision, community and leisure facilities, multi-agency areas that can provide support for learners and their families and SEN/ALN facilities of the highest quality.

However, prior to the development of the new Strategy, the transformation of education in the Machynlleth catchment area had started in 2012 with an area review which resulted in the establishment of Ysgol Bro Hyddgen in September 2014 as an all-age school across two campuses, merging the former Ysgol Bro Ddyfi and Ysgol Gynradd Machynlleth.

The second phase of the transformation was to develop a new build community school, replacing the poor-quality buildings. This project was included in the Council's 21st Century Schools Programme. The Council awarded a design and build contract to Dawnus Construction Ltd, and a combined SOC/OBC was approved by the Welsh Government in January 2017 – the estimated cost at this stage was £23.2m.

The scheme was at RIBA 4 full design stage, and the planning application had been submitted to the planning authority when, in March 2019, Dawnus entered administration. Construction had not yet started on site.

Following the collapse of Dawnus, officers took the opportunity to reconsider the design to see if it was feasible to include leisure and library provision, as well as early years and education provision.

In January 2020, a design team were directly employed by the Council to support a feasibility study, which concluded in May 2020. Information gathered during that feasibility study informed the revised SOC/OBC that was submitted to Welsh Government in the Autumn of

2020. The preferred solution at that time was for a fully integrated community campus model, including leisure and library at a cost of £48m.

At RIBA stage 3 in 2022, a full cost review of the project was undertaken in light of escalating construction inflation. The focus at this point was to:

- Review areas within the scheme
- Reduce the number of pupil places from 620 to 540, based on recent downward revision of pupil projections for the area
- Review energy requirements to see whether the current design could achieve carbon zero in operation, as the scheme had been designed to Passivhaus standard
- Updating condition assessments for both Bro Ddyfi Leisure Centre and Machynlleth Town Library to understand cost implications of maintaining/improving current buildings.

The review indicated that the community campus model was projected to have increased in cost to the region of £59m, which is unaffordable within the Council's Band B Sustainable Communities for Learning Programme totalling approximately £113m.

Just over £59m within this programme is currently allocated to support the development of other school building projects, leaving a maximum of £54m available for the Bro Hyddgen community campus project. To accommodate the expanded scheme, additional funding would therefore need to have been found outside the programme budget, and the cost escalation would have left no flexibility within the funding envelope to support other school projects.

The previous scheme was also designed to achieve Passivhaus energy standard, but the intention is now for the school to also achieve zero-carbon in operation. The energy review carried out on the community campus project, identified that there would be significant challenges to achieving carbon zero in operation due to the inclusion of a swimming pool in the building. Simplifying the scheme to remove the pool from the design mitigates these challenges.

Due to a mixture of cost escalation and design complexity to achieve zero carbon in operation, it was necessary to reconsider all options within the original SOC/OBC, along with new options based on reduced areas, resulting in a new SOC/OBC been developed. This includes a new preferred option of a new all-age school building, with early years, community facilities. The design currently incorporates an area of 225 sqm for a public library, to replace the existing Machynlleth Town Library, should that be required. The cost of this new option is £49,120,375, including risk (£3.2M) and optimism bias (£5.28M). This figure includes:

1. An increase to allow for tender inflation (against the previous cost plan – June 2021, to June 2022).
2. Forecast tender inflation - from base date to tender return.
3. Forecast tender inflation - from tender return to mid point construction.

This inflationary forecasts have been completed using the BCIS indices.



2 Strategic Case

The case for change is based on the need to improve facilities for pupils and wider community, in a rural area of north Powys. The current school infrastructure is in very poor condition. The school also operates under operational constraints as a multi-sited school.

- Headteacher and senior leadership team must split their time between two campuses.
- Due to the success of the amalgamation, specialist teachers teach the primary phase pupils, (science and P.E for example), but are often late to lessons due to the need to travel between lessons.
- Primary phased pupils cannot access specialist secondary site facilities due to the need to walk 1 mile to the site, and the need to cross the busy A487 trunk road.
- Due to the lack of car parking spaces at both sites, especially at the secondary site, cars often park on the netball court, which cause issues around safeguarding and delivering the curriculum.
- Secondary campus school is an old Victorian building which is not fit for purpose. Some classes need to be split for a maximum of 15 pupils due to the lack of classroom space.
- There is a lack of sporting facilities at both primary and secondary campuses, and the school pupils utilise the Bro Ddyfi Leisure Centre for some sports provision.
- Due to the lack of facilities, pupils and the wider community often need to travel out of county to Ceredigion or 30 miles to Newtown to access facilities such as an all-weather pitch. This is especially challenging during winter months.

The requested investment will deliver a brand new 540 place all age purpose-built school, with early years facilities, community use room, additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch.

The school building has been designed to support the school to deliver the new curriculum for Wales and will meet Donaldson aspiration of the three-phase approach in teaching and learning.

- Specialist equipment, including ICT and conferencing facilities, to support teaching and learning outcomes which will help to ensure all learners maximise their potential. The ICT facilities will also be available for community use, which will encourage lifelong learning opportunities.
- A fully equipped early years provision with hygiene and outdoor learning and play facilities.
- The school will be able to take full advantage of the all-through school teaching model, ensuring that all pupils are able to access specialist facilities and learning experiences.
- Dedicated outdoor learning areas, including a forest school area.

- A community service approach, with dedicated community facilities to include a community room, 3G pitch, MUGA (multi use games area) and grass pitches. Community groups will be able to access facilities out of school hours. Safeguarding will be ensured as the school will be able to lock down the teaching areas while enabling community access to the community zone.
- The building will aim to achieve Net Zero Carbon in Operation and not exceed embodied carbon limit of 800kgCo2e/m2 and BREEAM Excellent accreditation, having a positive impact on the recently declared Climate Emergency, and contributes to the Welsh Government 'Prosperity for All: A Low Carbon Wales'.

The existing secondary school site will be demolished to make room for a new car park and MUGA.

2.1 Strategic Fit

2.1.1 National Strategies

The proposal contained within this business case contribute to the following national and international strategies and policies:

- The Curriculum and Assessment (Wales) Act 2021.
- Additional Learning Needs (ALN) Code for Wales December 2018 and the Additional Learning Needs and Educational Tribunal (Wales) Act 2018.
- Wellbeing and Future Generations Act 2015.
- Sustainable Communities for Learning Programme.
- Skills framework for 3-19-year-olds in Wales 2008.
- One Wales: One planet, a new sustainable development scheme for Wales May 2009. Or any successor strategy.
- Net Zero Delivery Plan.
- Measuring the capacity of schools in Wales – Circular 021/2011.
- Welsh Medium Education Strategy 2010.
- A Living Language: A language for Living: Welsh Language Strategy 2012-17.
- Building a Brighter Future: Early Years and Childcare Plan 2013.

2.1.2 Local Strategies.

- Strategy for Transforming Education in Powys, which sets out Powys' approach to developing school infrastructure and the planning of school places.
- Welsh in Education Strategic Plan 2022-32 sets out the council's priorities for developing Welsh-medium provision within Powys..
- A Strategy For Climate Change-net positive Powys 2021-2030 Net Zero Schools, which identifies that all new schools will be part of a new generation of energy efficient buildings.
- Powys Regeneration Strategy aims to deliver outcomes which will have a positive impact upon the physical, social, environmental, economic, and cultural attributes of the county; and

- Powys ICT Strategy which aims at delivering learners' entitlement to use technology to support their learning and to enable schools to become more innovative and effective in their teaching and learning

2.2 Case for Change

2.2.1 Investment Objectives

The Investment Objectives underlying the case for change for this project are:

1. To improve the learning provision and outcomes for pupils and learners across the age range.
2. To ensure that pupils in the Machynlleth area can access high quality Welsh-medium provision through all key stages of education.
3. To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.
4. To further improve the transition between all key stages.
5. To ensure the economic, financial, and environmental sustainability of the school.

2.2.2 Targets and measures

The following table identifies the measures and targets that will be used to ensure that the identified investment objectives are SMART.

Table 1 – Targets and Measures

IO	Measure	Target
1.	<p>i. Improved learning outcomes, as measured by relevant data sources:</p> <ul style="list-style-type: none"> • Estyn inspection outcomes and benchmarks. • Regional / Local Authority Review. • Individual learner and learning centre targets. • Pupil voice / learning centre council feedback. • Whole school end of key stage performance data. • National benchmarking data. • DFES. <p>ii. Improved motivation, engagement, attendance, and extracurricular involvement as evidenced by facilities being used:</p> <ul style="list-style-type: none"> • Learning centre self-evaluation. • Learning centre improvement plan. 	<ul style="list-style-type: none"> • All lesson observations of the key areas of all key stages to be reported as 'Excellent' or 'Good' within 18 months of new school opening. • To achieve 'Excellent' or 'Good' Estyn and/or Local Authority judgements for the three Key Questions within 18 months of new school opening. • All lesson observations reported by Estyn as 'Excellent' or 'Good' for Teaching and Learning within 18 months of new school opening. • To achieve a judgement of at least 'Good' or 'Excellent' for learner outcomes as a result of Estyn inspections within 18 months of new school opening. • To gain a positive stakeholder satisfaction report based on Estyn, Learner and Parent questionnaires within 18 months of new school opening. • Post 16 education to be categorised as 'Excellent' across DFES and Estyn benchmarks.

IO	Measure	Target
	<ul style="list-style-type: none"> • Estyn inspection outcomes Local Authority review outcomes. 	<ul style="list-style-type: none"> • Attendance of school percentage rate to increase to at least 94% for the academic year 2018/19 (92.6% in 2012/2013). • To Interview 10% of pupils and 5% of parents to evaluate the effectiveness of the learning center's policies and practices in promoting learners' wellbeing seeking a satisfaction classification of at least 'good' (reference Parental survey annexe 5 Estyn guidance).
	iii. Pupil voice / school council.	
2.	<ul style="list-style-type: none"> i. Increased number of learners studying through the medium of Welsh. ii. Broader Welsh medium curriculum available to learners at all key stages. 	<ul style="list-style-type: none"> • 100% of learners in the Ysgol Bro Hyddgen catchment area have the option to study through the medium of Welsh by 2026. • Curriculum fully available through the medium of Welsh.
3.	i. Reduction in energy use and carbon emissions.	<ul style="list-style-type: none"> • Circa 90% Reduction in heating and 15% Reduction in Electricity Consumption (Cumulative reduction circa 70%) when measured against Powys County Councils Average DEC Data for schools. Targeted Energy circa ~ 49kWh/m2. Per year. Net Zero Carbon (NZC) in operation & Embodied Carbon below 800 kgCO2/m2.
4.	<ul style="list-style-type: none"> i. Improved learning outcome as evidenced by: <ul style="list-style-type: none"> • Estyn inspection outcomes. • Local Authority Review. • Individual pupil and school targets. ii. Pupil Voice /School Council feedback. 	<ul style="list-style-type: none"> • Increase performance between: <ul style="list-style-type: none"> ○ Key Stages 1 and 2. ○ Key Stages 2 and 3. ○ Key Stages 3 and 4, and ○ Key Stage 4 and Post 16 education. • Ensure that all pupils make at least one level of progress between key stage 2 and 3; and ensure that all pupils achieving the CSI at KS2 do so at KS3.
6.	<ul style="list-style-type: none"> i. Reduced backlog maintenance and accessibility costs. ii. Reduction in ongoing premises and utility costs. 	<ul style="list-style-type: none"> • Reduction in premises costs per square metre opening. • Removal of existing backlog maintenance liabilities on opening of the new assets. • Reduction in utility costs by 80% at the new school and library, and 50% at the new leisure centre within 12 months of opening.

Existing Arrangements

The location of the existing primary and secondary school infrastructure in relation to both the leisure centre and each other can be seen in figure one below.

While the physical distance between the two school sites is only one mile, as can be seen from the map, both school buildings are located at the opposite ends of the town.

Figure 1: Location of School in relation to the town

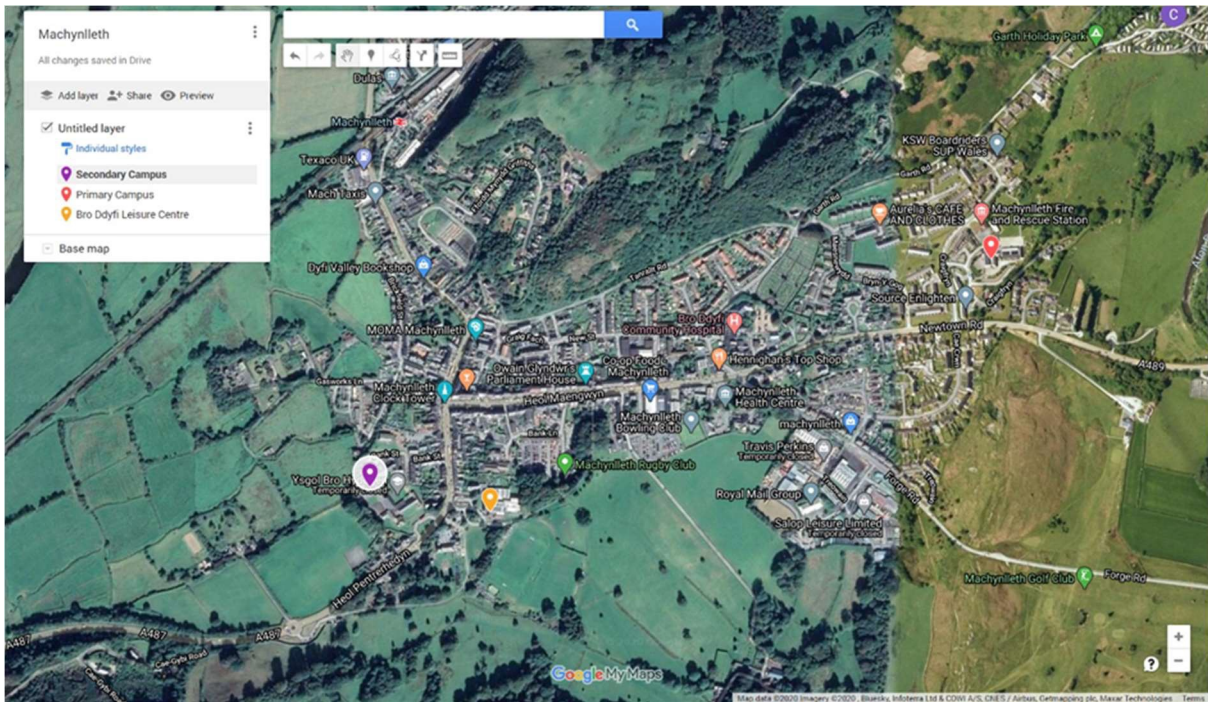


Figure 2: Secondary School Campus



Figure 3: Primary School Campus



Key information about the existing arrangements is held within tables 1-3 below:

Table 2 – Summary Information

Language Category	Category T3 (Transitional)
Age range	11-18
Total number of places in school	676
Number of pupils	470
Level of surplus places	30.5% (206)
Welsh First Language Pupils	64.5% (303)
Welsh Second Language Pupils	25.1% (118)
ALN/SEN Pupils	7.6%
Free School Meals	17.2%
Pupils from ethnic minorities	3.9%
Total Staff	62
Number of Teachers	39
Pupil Teacher Ratio	12.05

Table 3 – Present & forecast pupil numbers

School	Jan 2022	Jan 2023	Jan 2024	Jan 2025	Jan 2026
Primary	171	171	175	172	171
Secondary	328	335	314	305	285

Table 4 – Number of surplus places

School	Total places	Current places (Jan 2022)	Total surplus (Jan 2022)
Primary	213	166	47 (22.1%)
Secondary/	463	304	159 (34.3%)

Table 5 – Latest condition assessments (2016)

Building	Condition	Suitability	Sustainability
Primary	B/C	A	B
Secondary	C	C	C

Table 6 - Backlog Maintenance Costs

Property	Backlog maintenance costs
Secondary School	£4,133,313
Primary School	£1,341,153
Total	£5,475,466

2.2.3 Problems with the status quo - School

Ysgol Bro Hyddgen was established in September 2014 as PCC's first All Through School, providing education for 4–18-year-olds, following the merger of Ysgol Bro Ddyfi and Machynlleth CP School.

The school currently operates across two sites. While the two sites are less than a mile apart the nature of the split site does present some operational efficiency barriers.

The headteacher and senior leadership team share their time between the two campuses and are supported by an administrative team based at each of the two sites. Whole-school staff meetings and training events generally take place at the secondary campus. School meals are prepared in the kitchen on the secondary campus and transported to a server on the primary campus.

Cross-phase teaching and learning already takes place and has been one of the most successful aspects of the amalgamation of the schools. Teaching resources and expertise are shared, and secondary campus teachers travel, on a regular basis, to the primary campus

to deliver specialist classes. This has been particularly successful in delivering Mathematics, P.E and I.C.T lessons.

Due to the location of the secondary and primary campuses, primary pupils rarely attend classes at the secondary campus, with the result that teachers must travel between campuses. During busy times of the week, teachers are often late to lessons or must cut lessons short, which pose difficulties for the senior management team.

Due to the lack of car parking spaces at both sites, but specifically at the secondary campus, teachers and visitors often park on the netball pitch meaning that it is often inaccessible for school pupils. The school drop off area at the secondary campus is significantly insufficient, with only a narrow lay-by off the main road. During rush hour, and especially when work is being undertaken on the roads, the road and drop off area becomes congested and cause lengthy delays within the town.

The current condition and suitability of the school buildings have declined considerably with the passage of time. Issues are particularly acute at the secondary campus. The main problems with the current secondary campus building pose daily challenges to the senior management team, staff, and pupils.

Backlog maintenance costs have inflated such that it is becoming increasingly impossible to keep up with the demand of all the repair work, and the building is no longer considered fit for purpose, with leakages and heating specifically being of concern.

The configuration of the school, which is an old Victorian building, means that there are several educational blocks with insufficient space to effectively teach whole classes. Some classes can only accommodate as few as 15 pupils. This is an incredibly challenging situation for both the teachers and the pupils.

Due to the lack of sporting facilities at both campuses, pupils utilise the facilities at the nearby Bro Ddyfi Leisure Centre. This is a major concern within the local community because there is a need for the pupils to cross the busy A487, where it is argued, the current crossing poses a safeguarding risk.

The lack of state-of-the-art sporting facilities not only on the school sites, but in the Machynlleth area as a whole, means that there are very few opportunities on offer for local children, young people, and the wider community, with the need to travel out of county to Ceredigion or 30 miles to Newtown, to access modern facilities. With the school playing fields often being waterlogged, the netball court being used as a car parking space and the current size of the existing school halls, capital investment in improving access to leisure facilities is greatly needed.

2.3 Welsh Medium Education

The Council recently carried out the statutory process to change the school's language category from dual-stream to Welsh-medium on a phased basis, year by year, starting with Reception in September 2022.

Alongside this, the Welsh Government recently published new Welsh language categories for schools, which will start to be rolled out from September 2022. The Council is currently in the

process of agreeing with schools which of the new categories they will transfer into. The expectation is that Ysgol Bro Hyddgen will transfer into Category T3 (Transitional), whilst the phasing out of the English-medium stream continues, and that once this is complete, the school will be categorised as Category 3 – Welsh-medium.

2.4 ALN provision

Improving provision is one of the strategic aims of the Transforming Education Strategy in Powys 2020-30. In future, it is intended that Powys will have in place a range of provision for pupils with ALN including mainstream classes (with support where required), specialist classes, satellites of special schools, special schools, a pupil referral unit, outreach support from special schools and advice and guidance from a small team of highly qualified central staff. It is intended that provision in the Bro Hyddgen catchment will be further developed with a specialist centre at the school along with a suite of dedicated wellbeing rooms within the school.

2.5 Childcare/Nursery Provision

Powys County Council is committed to provide suitable infrastructure to enable providers to provide the 30-hour childcare scheme. Currently, PCC is contracted with two separate non-maintained settings, one is providing bi-lingual provision, and the other Welsh medium provision. The current arrangements are unsuitable and does not offer equitable service from an infrastructure perspective to the children of Machynlleth, with one setting being housed in demountable accommodation on the primary school site, and the other in an annex at the secondary school site. The current arrangement provides obstacles for the two settings to work more closely together.

Within the new building, a dedicated early years wing will be built incorporating two class bases, offices, hygiene facilities, and dedicated outdoor learning facilities. The school will also work closely with the settings to ensure that they have access to ICT facilities, if and when required.

2.6 Active Travel

It is anticipated that the flagship Community Campus project will improve active travel links within the town of Machynlleth.

As part of the scheme, the authority is looking to improve the active travel links and will ensure that the walking routes to the campus are safe and improvements will be made to the existing footpaths and pedestrian crossings, making the site much more 'community friendly' and accessible. The access to the site will be improved by replacing problematic three mini roundabouts (which currently sits on the main trunk road connecting Machynlleth to Aberystwyth) with one roundabout and a pedestrian crossing, significantly improving active travel for the site and wider community, which is crucial given the inclusion of community and leisure facilities within the scheme.

A highways travel assessment report has already been undertaken and has identified the need to improve Active travel links, but a further report will be done to expand the scope to include the travel needs of the wider community who will access the leisure facilities, as well as the needs of learners and staff.

The new all-through school serves the town of Machynlleth and wider catchment area. The primary school will continue to meet the needs of primary aged pupils within the town of Machynlleth, whilst the secondary element of the new buildings will serve the wider catchment schools which includes Glantwymyn, Carno and Llanbrynmair Federation.

The new site is situated less than a mile from the current primary school site, therefore there will be no impact in terms of travel and school transport.

Powys County Council will develop any construction project in line with Welsh Government Active Travel Wales Act (2013) and design guidance.

It is the council's view that active travel is essential to encourage staff, pupils, and wider members of the community to walk and cycle to new facilities, meaning that more people can enjoy the benefits of active travel.

2.7 Community Facilities

The proposed scheme will include a mixture of sports facilities that can be accessed by the wider communities located in and around the Machynlleth area. The school already has arrangements with local sports teams to enable access to their pitch and changing facilities and it is expected that this will continue under the proposed development.

Inclusion of a 3G pitch and MUGA within the scheme create new opportunities for both income streams for the school and access for the community to facilities that are not currently found within the area.

Provision has been made for a community room within the school building. This flexible and functional space will be of use for a wide range of community usage including access by community groups and private hire.

2.8 Equalities Impact Assessment & Children's Rights Assessments

The Bro Hyddgen all-through school provides an opportunity to establish an energy efficient building which supports, strengthens, and broadens Welsh medium provision by improving the breadth of Welsh medium options at all key stages and ensuring stronger transition and progress for pupils. The proposal would provide improved, fit for purpose, innovative specialist facilities for the children, young people, and wider community of North West Powys. The scheme will provide the best possible opportunities to all learners in the area, enabling them to reach their full potential.

The impact assessment consistently scores 'very good' in meeting council priorities, the wellbeing of future generations goals, and meets the council's key guiding principles. The project will promote health and wellbeing by establishing state of the facilities and will put equal

emphasis on physical and mental wellbeing. The project is also ground-breaking in supporting Welsh Government's carbon neutral agenda, with the building aiming to achieve both BREEAM Excellent, Passivhaus accreditation and Net Zero in operation. The energy considerations of the scheme ensure that PCC is committed to ensuring a sustainable and environmentally conscious model of delivering buildings to support its residents

The biggest risk to this project is the requirement to secure significant investment to deliver from both PCC and Welsh Government via the Sustainable Communities for Learning programme, which is 65% funded by WG and 35% PCC.

The Bro Hyddgen Impact Assessment (Appendix A) provides full details of the impact on:

- Consultation requirements
- Other services
- Geographical area
- The Powys Vision 2025
- The Welsh Government well being goals
- The councils other key guiding principles
- Our communities
- Service risks .

2.9 Net Zero Carbon and the Environment

The design of the proposed school has been specifically tailored to support the delivery of Net Zero Carbon to meet the Welsh Governments commitment to a carbon neutral public sector by 2030. Detailed below are the 5 ways that will support this aim throughout the build and the lifecycle of the proposed school.

- Implementation of Passivhaus methodology (a rigorous fabric first approach)
- Utilising the use of Cross Laminated Timber for the primary structure.
- Using Ground Granulated Blast Furnace Slag (GGBS) concrete mix.
- Use of low carbon PV panels.
- Locally sourcing manufactured goods (reduce carbon emissions)

By ensuring that rigorous materials (Passivhaus methodology) are used at the initial onset of the build, the school will maintain a constant temperature, through the level of insulation and ventilation. The school will be retaining heat from the sun and the occupants requiring very little additional heating or cooling.

The use of solar panels, air source heat pumps and MVHR (Mechanical Ventilation Heat Recovery) will reduce the requirement for the school to pull energy from the national grid reducing the use of carbon produced energy.

Cross Laminated timber adding further good insulation performance and also supporting low carbon impact through utilising sustainably produced wood (new trees planted as cultivated trees utilised for production of wood).

Utilising GGBS concrete (a by-product of making Iron), not only protects natural resources for future generations but reduces the energy intensive CO2 emissions that would be generated in the use of standard Portland cement.

Locally sourcing materials supports local manufacturers and will reduce the transportation related carbon emissions for the proposed school build.

2.10 Main Benefits

The main benefits associated with the strategic case are outlined below.

Table 7 – Benefits by Stakeholder

Investment Objective	Stakeholder	Main Benefits Criteria by Stakeholder Group
1. To improve the learning provisions and outcomes for pupils and learners across the age range.	Learners	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> Enhanced life chances and employment opportunities. Opportunities to benefit from a wider range of learning. Opportunities to benefit from a range of key & other learning skills.
		<u>Non-Quantifiable Benefits</u> <ul style="list-style-type: none"> Ability to positively contribute to Society and the wider community. Increased health and wellbeing of staff & students.
	Staff	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> Greater opportunities to use a wider range of different learning / teaching styles. Increased critical mass of staff that enables the sharing of opportunities via professional learning communities. Increased critical mass of students supports the development of staff expertise and specialisms.
		<u>Non-Quantifiable Benefits</u> <ul style="list-style-type: none"> Professional challenge to deliver subjects in contemporary ways. Improved professional credibility and integrity. Increased health and wellbeing of staff & students.
	Employers	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> Improved levels of recruitment, quality, and retention of staff.
		<u>Non-Quantifiable Benefits</u> <ul style="list-style-type: none"> Reputational improvement for the County Council. Improved opportunities to attract and retain high quality staff.
	Wider Community	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> Community regeneration and sustainability. Reduction in crime, anti-social behaviour, and disaffection.

Investment Objective	Stakeholder	Main Benefits Criteria by Stakeholder Group
		<p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Learners/pupils contributing more positively to society. • Improved community links and facilities ensuring community cohesion. • Enhanced local and national reputation of the wider community. • Improved community pride, self-esteem, confidence, and sense of belonging.
<p>2. To ensure that pupils in the Machynlleth area can access high quality Welsh-medium provision through all key stages of education.</p>	Learners	<ul style="list-style-type: none"> • An annual increase in the % of Welsh first language programmes. • An annual increase in the number of 11 – 16 courses that are available through the medium of Welsh. • An annual increase in the number of pupils taking subjects through the medium of Welsh in KS3 & KS4. • An annual increase in the number of Sixth Form pupils taking subjects through the medium of Welsh. • Wider range of both academic and vocational courses delivered or assessed in Welsh.
	Staff	<ul style="list-style-type: none"> • Significantly raise the capacity for learning bilingually and through Welsh medium across the authority via 14-19 Learning Pathways option menus developing the number of vocational courses delivered through the medium of Welsh.
	Employers	<ul style="list-style-type: none"> • More opportunities for Welsh speaking staff. • Bilingual training and employees. • increased availability of suitably qualified Welsh speaking employees in the Machynlleth and North Powys area.
	Wider Community	<ul style="list-style-type: none"> • Promotes bilingual ethos.
<p>3. To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.</p>	Learners	<p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Improved attendance. • Securing positive learning experiences. • Improved learning outcomes for learners and families. • Improved engagement with the learning process. • Improved access to learning materials (physical, academic, and emotional). • Greater potential for social interaction through increased number of peer groups and role models. • Equality of opportunity to access excellent teaching and learning experiences.

Investment Objective	Stakeholder	Main Benefits Criteria by Stakeholder Group
		<p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Inspired learning. • Greater learning opportunities to improve learners' key skills. • Creating independent learners. • Improved self-esteem and well-being. • Raising aspirations.
	Staff	<p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Access to a wider range of teaching materials (state of the art ICT and other emerging technologies). • Greater opportunities to use a wider range of different learning / teaching styles. • Increased opportunities for continuous professional development. • Increased critical mass of staff that enables the sharing of opportunities via professional learning communities. • Increased critical mass of pupils supports the development of staff expertise and specialisms.
		<p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • More opportunities to facilitate distributed leadership and increased responsibilities. • Working environment – motivated learners as a result from a more vibrant classroom experience.
	Employers	<p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Improved levels of recruitment, quality, and retention of staff.
		<p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Reputational improvement for the County Council. • More effective staffing structures – management and support.
	Wider Community	<p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Localised access to learning, sporting, and cultural opportunities. • Reduction in crime, anti-social behaviour, and disaffection. • Increase uptake of and access to healthy active lifestyles.
		<p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Securing local provision. • Improved community pride, self-esteem, confidence, and sense of belonging. • Improved community links and facilities ensuring community cohesion.

Investment Objective	Stakeholder	Main Benefits Criteria by Stakeholder Group
4. To further improve the transition between all key stages.	Learners	<ul style="list-style-type: none"> An annual increase in the % of KS2 pupils that transfer to Welsh first language programmes in KS3. An annual increase in the number of pupils taking subjects through the medium of Welsh in KS4. An annual increase in the number of pupils taking subjects through the medium of Welsh in the Sixth Form from September 2022.
	Staff	<ul style="list-style-type: none"> Increased opportunities for Welsh speaking staff.
	Employers	<ul style="list-style-type: none"> Bilingual training and employees. Larger and better qualified pool of potential employees with a greater range of qualifications. Greater learning capability attracts business to the area. Young People do not have to leave the area to learn.
	Wider Community	<ul style="list-style-type: none"> Reduction in the number of young people who are NEET.
5. To ensure the economic and financial sustainability of the school.	Learners	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> More funding due to redistribution of resources. Greater learning opportunities to improve learners' key skills. Wider range of curricular and non-curricular opportunities. Economies of scale (from closing two sites and opening a 'new' 4-18 school).
		<u>Non-Quantifiable Benefits</u> <ul style="list-style-type: none"> Greater potential for social interaction through increased number of peer groups and role models. Greater understanding of the importance of sustainable development and environmental issues.
	Staff	<u>Quantifiable Benefits</u> <ul style="list-style-type: none"> Sustainability and retention of staff. Greater staff expertise and specialisms. Increased opportunities for continuous professional development. Greater opportunities to use a wider range of different learning / teaching styles.
		<u>Non-Quantifiable Benefits</u> <ul style="list-style-type: none"> More opportunities to facilitate distributed leadership and increased responsibilities. Greater opportunity for flexible working practices e.g., team teaching. Improved professional credibility and integrity.

Investment Objective	Stakeholder	Main Benefits Criteria by Stakeholder Group
	Employers	<p><u>Cash Releasing Benefits</u></p> <ul style="list-style-type: none"> • Reduction in advertising costs for teaching staff. • Income from community use of facilities. • Potential for commercial lettings. • Backlog maintenance savings. <hr/> <p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Securing long-term opportunities for employment in the community. • Sustaining local business community. • Greater potential to reinvest revenue and capital. • Greater ability to target specific need. • Greater ability to share resources. • Greater consistency in managing employment issues. • Improved borrowing capacity (prudential borrowing). <hr/> <p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Improved financial management reputation and confidence that public funds are being used efficiently. • Futureproofing of rural communities. • Backlog maintenance costs removed for the first five years post new build (NB. This will be included in the economic analysis, but not as a benefit).
	Wider Community	<p><u>Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Securing long-term opportunities for employment in the community. • Community regeneration and sustainability. <hr/> <p><u>Non-Quantifiable Benefits</u></p> <ul style="list-style-type: none"> • Improved financial management reputation and confidence that public funds are being used efficiently. • Futureproofing of rural communities. • Sustaining local business community. • Enhanced local and national reputation of wider the community. • Improved community links and facilities ensuring community cohesion. • Improved community pride and sense of belonging.

2.11 Main Risks

The main risks associated with the strategic case are outlined below.

Table 8 – Strategic Risks and Countermeasures

Main Risk	Counter Measures
Business and Political Risks	
An unexpected reduction in the level/availability of capital or revenue funding leads to delays and reduction in the scope of the project.	No contractual commitments will be made until firm assurances have been given regarding the affordability and availability of funding.
Contract sum exceeds the approved budget due to price volatility, inflation, or instability in supply chain market conditions with wider economic factors.	Costs in SOC/OBC have factored in inflationary costs using BCIS indexes to the mid-point of construction. Optimism Bias and Risk also applied.
The project requires political endorsement.	Cabinet and Welsh Government approval is being sought.
Project fails to achieve net zero carbon and unable to draw down additional funding from Welsh Government.	Coordinated design approach through subsequent design stages with scheme assessment and gateway reviews utilising consultant design teams and specialists.
Service Risks	
Legislative changes.	Plan flexibility into the options where possible.
WG policy changes.	Plan flexibility into the options where possible.
External Environmental Risks	
Issues relating to planning permission or planning constraints.	There has been early engagement with the Local Authority Planning Department on the proposed site and to identify any issues relating to planning permission or planning constraints.
Covid 19.	Early engagement with contractors to establish an appropriate risk response.
Geographic location is not attractive to contractors	Early engagement with SEWSCAP contractors to ascertain interest

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2.12 Project Constraints

The project is subject to the following constraints:

- Availability of capital funding from Welsh Government and Powys County Council for any new build required.
- Any planning consent which may be required for any new build required.'
- Requirement to meet zero-carbon in use standards.
- Need to minimise negative impact on current pupils.

2.13 Project Dependencies

The project dependencies are as follows:

- Political support at local and national level.
- Stakeholder support – parents, governors, community, diocesan education authority.
- Capital funding from Welsh Government and Powys County Council.
- Internal officer capacity.
- Capacity of other service areas to provide support.
- Planning permission and any other statutory consents that may be required.

3 Economic Case

3.1 Critical Success Factors

CSF1: Strategic Fit

- The option must satisfy all 5 investment objectives and business needs.
- The option must optimise the benefits as presented in the Main Benefits Criteria.
- The option must be aligned with and promote the national, regional, and local strategies.

CSF2: Business Need

- The option must satisfy all of the Investment Objectives and associated business needs determined for the initiative.
- The option must also optimise compliance with these objectives throughout any phased implementation.
- The option must be the best fit with the demands for skills of the business and commercial communities within the area.

CSF3: Potential Value for Money (VFM)

- The option must optimise the resources available for the delivery of learning.
- The option must provide value for money in the delivery of learning.

CSF4: Potential Achievability

- The option must be acceptable to learners, staff, governors, and the wider community.
- The option must be politically acceptable at local, county, and national level.
- The option must be achievable within current legislation.
- The options must be operationally achievable/physically achievable.

CSF5: Supply side Capacity and Capability

- The option must secure sufficient appropriate resources and expertise to be deployed within Powys to achieve the investment objectives.

CSF6: Potential Affordability

- The extent to which the option is affordable within the forecasted revenue of participating organisations.
- The extent to which the option is affordable within the forecasted capital finding of participating organisations.

3.2 Long List Options

The long list of options was generated by a cross departmental group of stakeholders at a workshop held on Thursday 26th May 2022.

Each option was evaluated against the agreed investment objectives and critical success factors to determine whether they were to be discounted or carried forward to the short list for further consideration.

3.3 Scope Appraisal

3.3.1 Options

- Minimum – 4 to 16 All through School.
- Intermediate – 4 to 18 All through School.
- Expansive – 4 to 18 All through School and community facilities.
- Maximum – 4 to 18 All through School with community & leisure facilities.

3.3.2 Advantages and Disadvantages

Table 9 – Scope advantages and disadvantages

Do Minimum: 4 to 16 All through School.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Aligns to the strategic approach to education of Powys County Council. • Will contribute towards the wider efficiency of sixth form funding across the whole county. • Pupils accessing further and higher education elsewhere will have access to a wider range of courses than can currently be offered at Ysgol Bro Hyddgen's sixth form. • Provides new MUGA, 3G pitch and playing field facilities for school use. • Scheme would not require any potentially complex legal agreements over the asset with a third-party organisation (leisure). • Does not require any additional land to complete the development. • Cost of scheme unlikely to impact PCC's other Band B proposals. • Within the cost envelope for PCC. 	<ul style="list-style-type: none"> • Requires consultation to close the sixth form. • Increased travel to learn time for sixth form pupils. • Does not address condition issues with the current leisure centre building. • Does not help to create sustainable leisure facilities within the Machynlleth catchment area. • Loss of sixth form provision in the locality may be unpopular with the local community. • Does not help to safeguard local jobs at the leisure centre for the long term.
Intermediate: 4 to 18 All through School.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Provides continuity for pupils progressing from secondary to further education at the same site. • Minimises travel to learn time for learners access the sixth form at the 	<ul style="list-style-type: none"> • Current sixth form is small and therefore cannot offer a wide range of course choices to learners. • Does not contribute towards PCC creating a sustainable financially affordable

<p>site.</p> <ul style="list-style-type: none"> • Provides new MUGA, 3G pitch and playing filed facilities for school use. • Scheme would not require any potentially complex legal agreements over the asset with a third-party organisation (leisure). • Does not require any additional land to complete the development. • Cost of scheme unlikely to impact PCC's other Band B proposals. • Within the cost envelope for PCC. 	<p>approach to sixth form provision.</p> <ul style="list-style-type: none"> • Does not address condition issues with the current leisure centre building. • Does not help to create sustainable leisure facilities within the Machynlleth catchment area. • Does not help to safeguard local jobs at the leisure centre for the long term.
<p>Expansive: 4 to 18 All through School with community facilities.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Provides continuity for pupils progressing from secondary to further education at the same site. • Minimises travel to learn time for learners access the sixth form at the site. • Provides new MUGA, 3G pitch and playing filed facilities for both school and community use. • Creates new revenue stream opportunities for the school. • Provides new community focused facilities that can be assessed by local stakeholders and groups outside of school opening hours. • Offers the potential for inclusion of a community library either within the baseline scheme or at some later date. • Does not require any additional land to complete the development. • Scheme would not require any potentially complex legal agreements over the asset with a third-party organisation (leisure). • Cost of scheme unlikely to impact PCC's other Band B proposals. • Within the cost envelope for PCC. 	<ul style="list-style-type: none"> • Current sixth form is small and therefore cannot offer a wide range of course choices to learners. • Does not contribute towards PCC creating a sustainable financially affordable approach to sixth form provision. • Does not address condition issues with the current leisure centre building. • Does not help to create sustainable leisure facilities within the Machynlleth catchment area. • Does not help to safeguard local jobs at the leisure centre for the long term.
<p>Maximum: 4 to 18 All through School with community & leisure facilities.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Provides continuity for pupils progressing from secondary to further education at the same site. • Minimises travel to learn time for learners access the sixth form at the site. • Removes safeguarding issue crossing A487 road to the leisure site. 	<ul style="list-style-type: none"> • Current sixth form is small and therefore cannot offer a wide range of course choices to learners. • Does not contribute towards PCC creating a sustainable financially affordable approach to sixth form provision. • Requires negotiation with third party (Freedom Leisure).

<ul style="list-style-type: none"> • Increases opportunities for learners to access modern, fit for purpose leisure facilities. • Presents opportunities for expanding pupil access to leisure facilities. • Maintains the sustainability of leisure facilities within the community for the long term. • Help to safeguard leisure centre jobs within the community for the long term. • Maintains gross value add benefits achieved through the leisure centre provision to the local economy. 	<ul style="list-style-type: none"> • Site constraints affect design. • Requirement for additional land acquisition to make site feasible. • Solution may be cost prohibitive. • High costs would have a significant impact on the rest of PCC's Band B proposals. • Due to size of the development this solution would prevent a full 3G pitch from being included within development.
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3.3.3 Conclusion

Table 10 – Scope appraisal summary

Reference to:	Do Minimum	Intermediate Scope	Expansive Scope	Maximum Scope
To improve the learning provision and outcomes for pupils and learners across the age range.	✓	✓	✓	✓
To ensure that pupils in the Machynlleth area are able to access high quality Welsh-medium provision through all key stages of education.	✓	✓	✓	✓
To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.	✓	✓	✓	✓
To further improve the transition between all key stages.	✓	✓	✓	✓
To ensure the economic and financial sustainability of the school.	✓	✓	✓	✓
Strategic Fit				
Strategic Fit	✗	✓	✓	✓
Business Need	✗	✓	✓	?
Potential VFM	✓	✓	✓	?
Potential achievability	✓	✓	✓	✓
Supply side capability	✓	✓	✓	✓
Affordability	✓	✓	✓	?
Summary	Discounted	Possible	Preferred	Possible

The Expansive scope is the preferred option as it aligns with all the schemes investment objectives and critical success factors. The intermediate scheme to provide a 4-18 school without community facilities, which is the current arrangements, is also possible, as is the need to investigate further the Maximum option, including a leisure element.

3.4 Service Solution Appraisal

3.4.1 Options

- Option 1 – Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities.
- Option 2 – Dual site solution. Refurbish secondary campus and conduct essential maintenance to primary campus. No community facilities.
- Option 3 – Dual site solution. Remodel secondary campus and conduct essential maintenance to primary campus. No community facilities.
- Option 4 – Dual site solution. New build secondary campus and conduct essential maintenance to primary campus. No community facilities.
- Option 5 – Dual site solution. New build secondary campus with new community use facilities and conduct essential maintenance to primary campus.
- Option 6 – Dual site solution. New build secondary and primary campus buildings. No community facilities.
- Option 7 – Dual site solution. New build secondary campus with new community use facilities and new build primary campus.
- Option 8 – Single site solution. New build all through school on the existing secondary school site. No community facilities.
- Option 9 – Single site solution. New build all through school on the existing secondary school site. With community facilities.
- Option 10 – Single site solution. New build all through school on the existing secondary school site, with community facilities in a leisure campus.

3.4.2 Advantages and Disadvantages

Table 11 – Service solution advantages and disadvantages

Option 1: Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • No capital spends required immediately. • Enables alternative use of capital funding within the programme envelope. • No significant construction disruption to pupils and learners. 	<ul style="list-style-type: none"> • Inadequate school buildings that are in poor condition will continue in use. • Current cohort of learners continues to be taught in sub-standard accommodation. • Does not provide a single sited All Through Campus. • Piecemeal school estate (at Ysgol Bro Hyddgen). • Does not fully realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. • Will still require significant investment in the short/medium term. • Does not address issue of surplus places. • Will not generate any lifecycle efficiencies. • Will not generate any property revenue efficiencies. • Solution does not offer any new facilities for the communities in proximity to the site. • No new potential for additional revenue income streams. • Current layouts are inappropriate. • Will result in significant investment required in medium term. • Will not in result in a 21st Century standard school. • Does not free up sites for capital release. • Does not provide opportunity for new housing on existing primary school site.
Option 2: Dual site solution. Refurbish secondary campus and conduct essential maintenance to primary campus. No community facilities.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Extends the life of the secondary school building. • Addresses immediate issues easily. • Reduces the probability of disruption to service delivery. • Less immediate drain on Council's capital 	<ul style="list-style-type: none"> • Inadequate school buildings continue with poor suitability and sustainability factors, R & M funding would not stop further deterioration. • Current cohort of learners continues to be taught in sub-standard accommodation.

<p>resources.</p> <ul style="list-style-type: none"> • Continuity of education on sites. • Enables alternative use of capital funding within the programme envelope. 	<ul style="list-style-type: none"> • Does not provide a single sited All Through Campus. • Piecemeal school estate (at Ysgol Bro Hyddgen). • Does not fully realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. • Does not address issue of surplus places. • Unlikely to generate lifecycle efficiencies. • Unlikely to generate property revenue efficiencies. • Solution does not offer any new facilities for the communities in proximity to the site. • No new potential for additional revenue income streams. • Financially unviable as it will not attract 21st Century School funding. • Does not enhance current public perception of the condition of the specialist school facilities campus. • Some noise disruption to pupils. • Does not improve the learning environment and does not provide a suitable environment suitable for the needs of vulnerable pupils and staff. • Does not enhance current public perception of the condition of the specialist school facilities campus, may be viewed as a stop gap solution. • The works required at Ysgol Bro Hyddgen could severely impact the Major Improvement Programme fund, which will decrease the amount of funding available for much needed improvements at other schools. • Will not in result in a 21st Century standard school. • Does not free up sites for capital release. • Does not provide opportunity for new housing on existing primary school site.
<p>Option 3: Dual site solution. Remodel secondary campus and conduct essential maintenance to primary campus. No community facilities.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Extends the life of some secondary school blocks. • Addresses immediate issues easily. 	<ul style="list-style-type: none"> • Disruption to pupils. • Inadequate school buildings continue with poor suitability and sustainability factors, R & M funding would not stop further

<ul style="list-style-type: none"> • Less immediate drain on Council's capital resources in Band B. • Enables alternative use of capital funding within the programme envelope. • Provision matches current and long-term pupil projections. • Partially addresses surplus places issue. • Provides a clear learning pathway (4-18yrs). • No significant construction disruption and continuity of education on the current site. • Provides flexibility within (SOP) cost envelope to focus on other priorities. • Marginal improvements in premises result in improved teaching and learning experiences and outcomes. • Improves the condition of the school estate. 	<p>deterioration on blocks not rebuilt.</p> <ul style="list-style-type: none"> • Potential reduction in outdoor space. • Does not provide a single sited All Through Campus. • Piecemeal school estate (at Ysgol Bro Hyddgen). • Does not realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. • Unlikely to generate substantial lifecycle efficiencies. • Unlikely to generate substantial property revenue efficiencies. • Solution does not offer any new facilities for the communities in proximity to the site. • No new potential for additional revenue income streams. • Does not enhance current public perception of the condition of the specialist school facilities campus, may be viewed as a stop gap solution. • Does not improve the learning environment overall and does not provide a suitable environment suitable for the needs of vulnerable pupils and staff. • Will not in result in a 21st Century standard school. • Does not free up sites for capital release. • Does not provide opportunity for new housing on existing primary school site.
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Option 4: Dual site solution. New build secondary campus and conduct essential maintenance to primary campus. No community facilities.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Will generate 21st Century standard school for secondary pupils. • Creates a carbon efficient building. • Optimises utility costs. • Reduces lifecycle costs. • New facilities will prove attractive to potential learners and employees. • New facilities will be viewed positively within the community. • Enhanced teaching and learning facilities result in enhanced educational outcomes. • Provision matches current and long-term pupil 	<ul style="list-style-type: none"> • Does not provide 21st Century standard school for primary cohort. • Potential transport disruption within the locality during construction. • Larger capital requirement. • Current cohort of primary learners continues to be taught in sub-standard accommodation. • Potential reduction in outdoor space. • Does not provide a single sited All Through Campus. • Piecemeal school estate (at Ysgol Bro Hyddgen).

<p>projections.</p> <ul style="list-style-type: none"> Partially addresses surplus places issue. 	<ul style="list-style-type: none"> Does not realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. Lack of parity between primary and secondary sector in terms of building conditions. Solution does not offer any new facilities for the communities in proximity to the site. No new potential for additional revenue income streams. Does not fully realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. Does not free up sites for capital release. Does not provide opportunity for new housing on existing primary school site.
<p>Option 5 – Dual site solution. New build secondary campus with new community use facilities and conduct essential maintenance to primary campus.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> Will generate 21st Century standard school for secondary pupils. Creates a carbon efficient building. Optimises utility costs. Reduces lifecycle costs. New facilities will prove attractive to potential learners and employees. New facilities will be viewed positively within the community. Enhanced teaching and learning facilities result in enhanced educational outcomes. Provision matches current and long-term pupil projections. Partially addresses surplus places issue. Offers new facilities for the communities in proximity to the site. Community use facilities provide potential for additional revenue income streams. 	<ul style="list-style-type: none"> Does not provide 21st Century standard school for primary cohort. Potential transport disruption within the locality during construction. Larger capital requirement. Current cohort of primary learners continues to be taught in sub-standard accommodation. Potential reduction in outdoor space. Does not provide a single sited All Through Campus. Piecemeal school estate (at Ysgol Bro Hyddgen). Lack of parity between primary and secondary sector in terms of building conditions. Does not realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. Does not free up sites for capital release. Does not provide opportunity for new housing on existing primary school site.
<p>Option 6 – Dual site solution. New build secondary and primary campus buildings. No community facilities.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> Will generate 21st Century standard school for secondary pupils. 	<ul style="list-style-type: none"> Potential transport disruption within the locality during construction.

<ul style="list-style-type: none"> • Creates a carbon efficient building. • Optimises utility costs. • Reduces lifecycle costs. • New facilities will prove attractive to potential learners and employees. • New facilities will be viewed positively within the community. • Enhanced teaching and learning facilities result in enhanced educational outcomes. • Provision matches current and long-term pupil projections. • Addresses surplus places issue. 	<ul style="list-style-type: none"> • Larger capital requirement. • Does not provide a single sited All Through Campus. • Piecemeal school estate (at Ysgol Bro Hyddgen). • Solution does not offer any new facilities for the communities in proximity to the site. • No new potential for additional revenue income streams. • Does not realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. • Does not free up sites for capital release. • Does not provide opportunity for new housing on existing primary school site. • Reduces capital funding availability for other schemes.
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Option 7 – Dual site solution. New build secondary campus with new community use facilities and new build primary campus.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Will generate 21st Century standard school for secondary pupils. • Creates a carbon efficient building. • Optimises utility costs. • Reduces lifecycle costs. • New facilities will prove attractive to potential learners and employees. • New facilities will be viewed positively within the community. • Enhanced teaching and learning facilities result in enhanced educational outcomes. • Provision matches current and long-term pupil projections. • Addresses surplus places issue. • Offers new facilities for the communities in proximity to the site. • Community use facilities provide potential for additional revenue income streams. 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction. • Larger capital requirement. • Does not provide a single sited All Through Campus. • Does not fully realise the benefits of an All Through School in terms of cross-phase teaching and learning/transition, or use of specialist teaching facilities. • Does not free up sites for capital release. • Does not provide opportunity for new housing on existing primary school site. • Reduces capital funding availability for other schemes.

Option 8 – Single site solution. New build all through school on the existing secondary school site. No community facilities.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Will generate 21st Century standard school for secondary pupils. 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction.

<ul style="list-style-type: none"> • Creates a carbon efficient building. • Optimises utility costs. • Reduces lifecycle costs. • New facilities will prove attractive to potential learners and employees. • New facilities will be viewed positively within the community. • Enhanced teaching and learning facilities result in enhanced educational outcomes. • Provision matches current and long-term pupil projections. • Addresses surplus places issue. • Provides a clear learning pathway (4-16yrs). • Creates a single sited all through campus. • Maximises the benefits of an all through school in terms of cross-phase teaching and learning/transition, or use of specialist facilities. • Facilitates the capital receipt opportunity from the sale of the primary school site. • Enables new housing development opportunity on the old primary school site; 	<ul style="list-style-type: none"> • Larger capital requirement. • Reduces capital funding availability for other schemes. • Solution does not offer any new facilities for the communities in proximity to the site. • No new potential for additional revenue income streams.
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Option 9 – Single site solution. New build all through school on the existing secondary school site. With community facilities.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Will generate 21st Century standard school for secondary pupils. • Creates a carbon efficient building. • Optimises utility costs. • Reduces lifecycle costs. • New facilities will prove attractive to potential learners and employees. • New facilities will be viewed positively within the community. • Enhanced teaching and learning facilities result in enhanced educational outcomes. • Provision matches current and long-term pupil projections. • Addresses surplus places issue. • Provides a clear learning pathway (4-16yrs). • Creates a single sited all through campus. • Maximises the benefits of an all through school in terms of cross-phase teaching and learning/transition, or use of specialist 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction. • Larger capital requirement. • Reduces capital funding availability for other schemes.

<p>facilities.</p> <ul style="list-style-type: none"> • Facilitates the capital receipt opportunity from the sale of the primary school site. • Enables new housing development opportunity on the old primary school site. • Offers new facilities for the communities in proximity to the site. • Community use facilities provide potential for additional revenue income streams. 	
<p>Option 10 – Single site solution. New build all through school on the existing secondary school site, with community facilities in a leisure campus.</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Will generate a 21st Century standard school for pupils. • Creates a carbon efficient building. • Optimises utility costs. • New facilities will be viewed positively within the community. • Provision matches current and long-term pupil projections. • Facilitates the capital receipt opportunity from the sale of the primary school site. • Enables new housing development opportunity on the old primary school site. • Design is in place. • Provides continuity of the majority of Leisure facilities in Machynlleth. • Target Operating Model identifies that there is capacity for the school and Freedom Leisure to operate facilities to meet demand within the designed facilities. 	<ul style="list-style-type: none"> • Reduces capital funding availability for other schemes earmarked under the 21st Century Schools Programme. • Current site is constrained and there is a requirement to purchase additional land adjacent to the site. • Target Operating Model identifies that it is unlikely that the School and Freedom Leisure will be able to operate the campus in the most efficient way, meaning a duplication of operational time and cost. • This scheme is the most expensive capital option reviewed.



3.4.3 Conclusion

Table 12 – Service Solution appraisal summary

Reference to:	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10
To improve the learning provision and outcomes for pupils and learners across the age range.	x	x	x	?	?	✓	✓	✓	✓	✓
To ensure that pupils in the Machynlleth area are able to access high quality Welsh-medium provision through all key stages of education.	x	?	✓	✓	✓	✓	✓	✓	✓	✓
To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.	x	x	?	?	?	✓	✓	✓	✓	✓
To further improve the transition between all key stages.	x	x	x	x	x	x	x	✓	✓	✓
To ensure the economic and financial sustainability of the school.	x	x	x	?	?	?	?	✓	✓	✓
Critical Success Factors										
Strategic Fit	x	x	x	x	x	x	x	✓	✓	✓
Business Need	x	x	x	x	x	x	x	✓	✓	?
Potential VFM	x	x	x	x	x	x	x	✓	✓	?
Potential achievability	x	x	x	✓	✓	✓	✓	✓	✓	✓
Supply side capability	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Affordability	✓	✓	✓	✓	✓	x	x	✓	✓	?
Summary	Discount but Carry Forward	Discounted	Discounted	Discounted	Discounted	Discounted	Discounted	Possible	Preferred	Possible

Options 8, 9 and 10 meet or may potentially meet all of the scheme’s investment objectives and critical success factors and are therefore shortlisted.

3.5 Service Delivery Appraisal

3.5.1 Options

- Minimum – Local Authority delivery.
- Intermediate – Local Authority and Private Sector partner arrangements.
- Maximum – Private Sector partnership (PPP).

3.5.2 Advantages and Disadvantages

Table 13 – Service delivery advantages and disadvantages

Minimum: Local Authority.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • All requisite delivery structures are already in place. • Local Authority has extensive experience in delivering this service delivery model. • Cost effective model. • Strategic link to Councils School Transformation Programme. • Most expedient model for delivery. • Politically acceptable. • Limited risk due to specialist support within LA. 	<ul style="list-style-type: none"> • May stifle innovation.
Intermediate: Local Authority and Private Sector Partner arrangements.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • All requisite delivery structures in place. • Local Authority has extensive experience in delivering this service delivery model. • Cost effective model. • Strategic link to Councils School Transformation Programme. • Most expedient model for delivery. • Politically acceptable. • Limited risk due to specialist support within LA. 	<ul style="list-style-type: none"> • Will prove more expensive for the Local Authority. • Contractor may not be au fait with the workings and culture of Local Authority.
Maximum: Private Sector partnership (PPP).	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Private sector suppliers will provide specialisms and capacity that the Local Authority alone cannot provide. • Services can be delivered relatively quickly. 	<ul style="list-style-type: none"> • Private contractor is an unknown quantity. • Contractor may not be au fait with the workings and culture of Local Authority. • Any private sector partnership will be unlikely to include local contractors.

	<ul style="list-style-type: none"> Profit element of partnership may impact on funds available for development.
--	--------------------------------------------------------------------------------------------------------------------------------

3.5.3 Conclusion

Table 14 – Service Delivery appraisal summary

Reference to:	LA	LA & PSP	PPP
To improve the learning provision and outcomes for pupils and learners across the age range.	✓	✓	✓
To ensure that pupils in the Machynlleth area are able to access high quality Welsh-medium provision through all key stages of education.	✓	✓	✓
To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.	✓	✓	✓
To further improve the transition between all key stages.	✓	✓	✓
To ensure the economic and financial sustainability of the school.	✓	✓	✓
Critical Success Factors			
Strategic Fit	✓	✗	✗
Business Need	✓	✗	✗
Potential VFM	✓	?	?
Potential achievability	✓	✗	✗
Supply side capability	✓	✗	✗
Affordability	✓	?	?
Summary	Preferred	Discounted	Discounted

3.6 Implementation Appraisal

3.6.1 Options

- Minimum – New School opens Autumn Term 2026.
- Intermediate – New School opens Summer Term 2026.
- Maximum – New School opens Autumn Term 2025.

3.6.2 Advantages and Disadvantages

Table 15 – Implementation advantages and disadvantages

Minimum: New School opens Autumn Term 2026.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Lack of disruption to education in the short term. 	<ul style="list-style-type: none"> • Local community disruption due to extended period of works. • Delayed to accrual of scheme benefits. • Immediate cohorts of learners miss out unnecessarily on 21st Century school facilities.
Intermediate: New School opens Summer Term 2026.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Increased cohorts of learners enjoy 21st Century school facilities within a reasonable period of time. • Allows time for innovation in design but ensures completion within a reasonable time scale. • Limits the ongoing effect of local community disruption. 	<ul style="list-style-type: none"> • Partial delay to accrual of scheme benefits.
Maximum: New School opens Autumn Term 2025	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Maximise the cohorts of learners who enjoy 21st Century school facilities within a reasonable period of time. • Minimises disruption to learners once school becomes operational. • Ensures completion in a timely manner. • Minimises local community disruption. 	<ul style="list-style-type: none"> • Potential for rushed design (lack of innovation). • Timescales may be unrealistic due to lead in time for sourcing materials. • Requires additional bespoke resource for project in order to deliver upon demanding timescale.

3.6.3 Conclusion

Table 16 – Implementation appraisal summary

Reference to:	Autumn 2026	Summer 2026	Autumn 2025
Investment Objectives			
To improve the learning provision and outcomes for pupils and learners across the age range.	✓	✓	✓
To ensure that pupils in the Machynlleth area are able to access high quality Welsh-medium provision through all key stages of education.	✓	✓	✓
To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.	✓	✓	✓
To further improve the transition between all key stages.	✓	✓	✓
To ensure the economic and financial sustainability of the school.	✓	✓	✓
Critical Success Factors			
Strategic Fit	✓	✓	✓
Business Need	✓	✓	✓
Potential VFM	✗	✓	✓
Potential achievability	?	✓	?
Supply side capability	✓	✓	✓
Affordability	✓	✓	✓
Summary	Discounted	Preferred	Possible

3.7 Funding Appraisal

3.7.1 Options

- Minimum – Wholly Local Authority funded from capital programme.
- Intermediate – Mix of Local Authority borrowing and Welsh Government funding.
- Maximum – Wholly Welsh Government grant funded.
- Alternative – Mutual Investment Fund (MIM).

3.7.2 Advantages and Disadvantages

Table 17 – Funding advantages and disadvantages

Minimum: Wholly Local Authority funded from capital programme.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Would not require any additional Local Authority borrowing. • Maximum control over scale and timescale of scheme. 	<ul style="list-style-type: none"> • Diverts capital from other community priorities such as Social Care and highways. • Cost prohibitive. • Affordability.
Intermediate: Mix of Local Authority borrowing and Welsh Government funding.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Ensures affordability of scheme. • Provides certainty to Welsh Government i.e., the scheme fits strategically. • Allows for the direction of capital monies to other community priorities. 	<ul style="list-style-type: none"> • Repayment costs for Local Authority may impact on revenue budgets. • Welsh Government grant funding requirements may be onerous. • Application process may delay delivery.
Maximum: Wholly Welsh Government grant funded.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Enables major capital investment in other community priorities. 	<ul style="list-style-type: none"> • Welsh Government grant funding requirements may be prohibitive. • Application process may delay delivery. • May stifle innovation.
Alternative: Mutual Investment Model.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • No capital funding required up front. • Sponsorship from Welsh Government. • Cost certainty (capital and revenue). • Welsh Governments preferred model. 	<ul style="list-style-type: none"> • Scheme is already developed to RIBA 2 stage therefore not eligible for MIM. • Development partners may not be interested. • Complex ownership and governance model. • Multifaceted governance may stifle innovation.

3.7.3 Conclusion

Table 18 – Funding appraisal summary

Reference to:	LA 100%	Mix	WG 100%	MIM
Investment Objectives				
To improve the learning provision and outcomes for pupils and learners across the age range.	✓	✓	✓	✓
To ensure that pupils in the Machynlleth area are able to access high quality Welsh-medium provision through all key stages of education.	✓	✓	✓	✓
To deliver a fit for purpose building solution that delivers an improved learning environment, meeting zero-carbon in operation requirements, and of the appropriate size.	✓	✓	✓	✓
To further improve the transition between all key stages.	✓	✓	✓	✓
To ensure the economic and financial sustainability of the school.	✓	✓	✓	✓
Critical Success Factors				
Strategic Fit	✗	✓	✓	?
Business Need	✓	✓	✓	?
Potential VFM	✓	✓	✓	✓
Potential achievability	✓	✓	?	✗
Supply side capability	?	✓	?	?
Affordability	✗	✓	✓	✓
Summary	Discounted	Preferred	Discounted	Discounted



3.8 Summary of appraisals

Table 19 – Long List Summary

Scope appraisal	Minimum – 4 to 16 All through School.			Intermediate – 4 to 18 All through School.			Expansive – 4 to 18 All through School and community facilities.		Maximum – 4 to 18 All through School with community and leisure facilities.
Service solution (Long list appraisal)	Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities. Dual site solution. Refurbish secondary campus and conduct essential maintenance to primary campus. No community facilities.	Dual site solution. Remodel secondary campus and conduct essential maintenance to primary campus. No community facilities.	Dual site solution. New build secondary campus and conduct essential maintenance to primary campus. No community facilities.	Dual site solution. New build secondary campus with new community use facilities and conduct essential maintenance to primary campus.	Dual site solution. New build secondary and primary campus buildings. No community facilities.	Dual site solution. New build secondary campus with new community use facilities and new build primary campus.	Single site solution. New build all through school on the existing secondary school site. No community facilities.	Single site solution. New build all through school on the existing secondary school site. With community facilities.	Single Site solution. New Builf all through school on the existing secondary school site, with community facilities in a leisure campus



Service Delivery	Minimum: LA Delivery.	Intermediate: LA and Private Sector Delivery.	Maximum: Private Sector partnership (PPP).	
Implementation	Minimum: New School opens Autumn Term 2026	Intermediate: New School opens Summer Term 2026	Maximum: New School opens Autumn 2025	
Funding	Wholly Local Authority funded from capital programme	Mix of Local Authority borrowing and Welsh Government funding	Wholly Welsh Government grant funded	Mutual Investment Fund (MIM)

The shortlisted options are therefore:

- Option 1 – Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities.
- Option 8 – Single site solution. New build all through school on the existing secondary school site. No community facilities.
- Option 9 – Single site solution. New build all through school on the existing secondary school site. With community facilities.
- Option 10 – Single site solution. New build all through school on the existing secondary school site. With community facilities in a leisure campus.

At this point the preferred implementation plan is for the scheme to be tendered at the end of RIBA stage three, which would enable the school to open for the Summer term of the 2025/26 academic year. It is also possible however to tender the scheme at either the end of RIBA stage two and four which would likely enable the new school to open earlier, potentially after the Autumn Half Term break of the 2025/26 academic year. The full programmes for these possible solutions are set out within the management case.

3.9 Economic Appraisal

3.9.1 Net Present Cost

The detailed economic appraisals for each shortlisted option are attached to this business case in the NPV spreadsheet. The short-listed options have been risk-adjusted to account for the ‘risk retained’ (in £s) by the organisation under each option. The following tables summarises the key results of the economic appraisals for each option.

Table 20 – Economic Appraisal

DISCOUNTED CASHFLOW (DCF) SUMMARY SHEET					
Discounted Cash flow (DCF) Summary Sheet		Inc. Optimism Bias		Excl. Optimism Bias	
Option No.	Option Name/Description	NPC (£m)	EAC (£m)	NPC (£m)	EAC (£m)
Option 1:	Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities.	56.5	3.84	55.9	3.80
Option 8:	Single site solution. New build all through school on the existing secondary school site. No community facilities.	139.8	5.33	132.6	5.06
Option 9:	Single site solution. New build all through school on the existing secondary school site. With community facilities.	139.4	5.32	132.1	5.04
Option 10	Single site solution: New build all through school on the existing secondary school site. With community facilities as a leisure	158.6	6.0	153.7	5.9

DCF = Discounted Cash flow
 NPC = Net Present Cost
 EAC = Equivalent Annual Cost

Please note that the revenue / lifecycle cost totals shown in the tables above consist of the elements detailed in table 23 below. For a full breakdown of costs incurred by the PCC please see the excel model appended to this business case. Assumptions underpinning these calculations include:

- There is anticipated to be no change to existing school staffing structure.
- There is a forecasted reduction in the school's utilities costs of 80% due to the introduction of zero-carbon in use technologies, however this will not impact on the funding formula calculations used within PCC savings accrued from the improved energy efficiency of the building will be of direct benefit to the school.

Table 21 – Revenue Components

Option	Years	Cost Elements	Category	Undiscounted Value (£'000)
Option 1 Dual-site solution. Backlog maintenance only.	Years 1-2	Backlog Maintenance	Whole life	£5,475,466
	Years 0 – 19	Revenue Costs	Per annum	£2,931,165
	Years 0 – 19	Lifecycle Cost	Whole life	£360,147
Option 8 Single site solution. New build all through school on the existing secondary school site. No community facilities.	Years 0-4	Capital Construction	Whole life	£40,332,168
	Years 0-3	Revenue Costs <small>NB year 3 includes a split of old and new costs to reflect September start</small>	Per annum	£2,931,165
	Year 5-59	Revenue Costs	Per annum	£2,997,673
	Years 4-59	Lifecycle Cost	Whole life	£25,325,068
Option 9 Single site solution. New build all through school on the existing secondary school site. With community facilities.	Years 0-4	Capital Construction	Whole life	£40,595,351
	Years 0-3	Revenue Costs <small>NB year 3 includes a split of old and new costs to reflect September start</small>	Per annum	£2,931,165
	Year 5-59	Revenue Costs	Per annum	£2,998,652
	Years 4-59	Lifecycle Cost	Whole life	£25,415,958
Option 10 Single site solution. New build all through school on the existing secondary school	Years 0-4	Capital Construction	Whole life	£57,483,875
	Years 0-3	Revenue Costs <small>NB year 3 includes a split of old and new costs to reflect September start</small>	Per annum	£2,931,165
	Year 4-59	Revenue Costs	Per annum	£3,006,486

Option	Years	Cost Elements	Category	Undiscounted Value (£'000)
site, with community facilities in a leisure campus.	Years 4-59	Lifecycle Cost	Whole life	£34,494,088

3.9.2 Economic Ranking

Table 22 – Economic Summary

Option	Description	NPC (£M)	Discounted Benefits	EAC (£M)
1	Dual site solution. Undertake essential maintenance only to both primary and secondary school sites. No community facilities.	£56.5	£0	£3.84M
8	Single site solution. New build all through school on the existing secondary school site. No community facilities.	£139.8	£0	£5.33
9	Single site solution. New build all through school on the existing secondary school site. With community facilities.	£139.4	£0	£5.32
10	Single site solution. New build all through school on the existing secondary school site. With community facilities in a leisure campus.	£158.6	£0	£6

3.9.3 Monte Carlo Simulation

To make the scenario planning more robust (and less linear), we have completed a Monte Carlo Simulation in this business case. The simulation uses the following cost elements as variables: backlog maintenance/new build capital, old revenue cost, new revenue cost, lifecycle cost, capital receipts and new community lettings. Monte Carlo simulation uses random number generation to provide a set of predictive results. Charting these results can allow you to determine the probability of a particular result or set of results occurring.

Each variable went through 1000 iterations of number generation to produce a Normal or Gaussian distribution of the potential results obtainable. A normal distribution for the data was chosen as the results should conform to central tendency theorem, being clustered around the estimated value rather than being uniformly distributed between two points.

Once the variables for each option were simulated, the results were used as the input for 27 different potentials 'What if' scenarios based along the three dimensions of capital, revenue, and savings. The scenarios were used to demonstrate the sensitivity between the different variables, providing 27 (+1 base value) different potential outcomes for NPC per option. A list

of the 27(+1) scenario is, and the 28 NPC potential results for each option is shown in Appendix B: Monte Carlo Simulation.

Finally, the mean and standard deviation values for the 28 scenarios were used as the input variables for a further 1000 iterations of the simulation to produce a final Normal distribution curve for each of the four shortlisted options. The results are demonstrated in the two charts below.

Figure 4: Probability Density Function

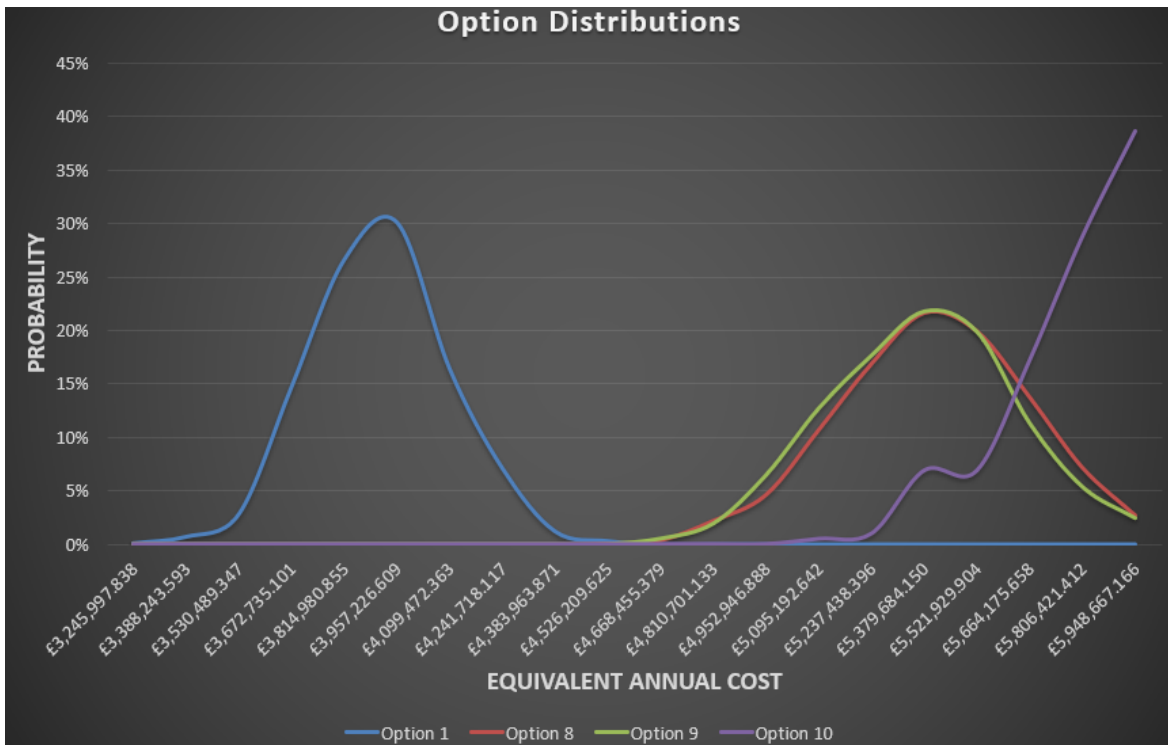
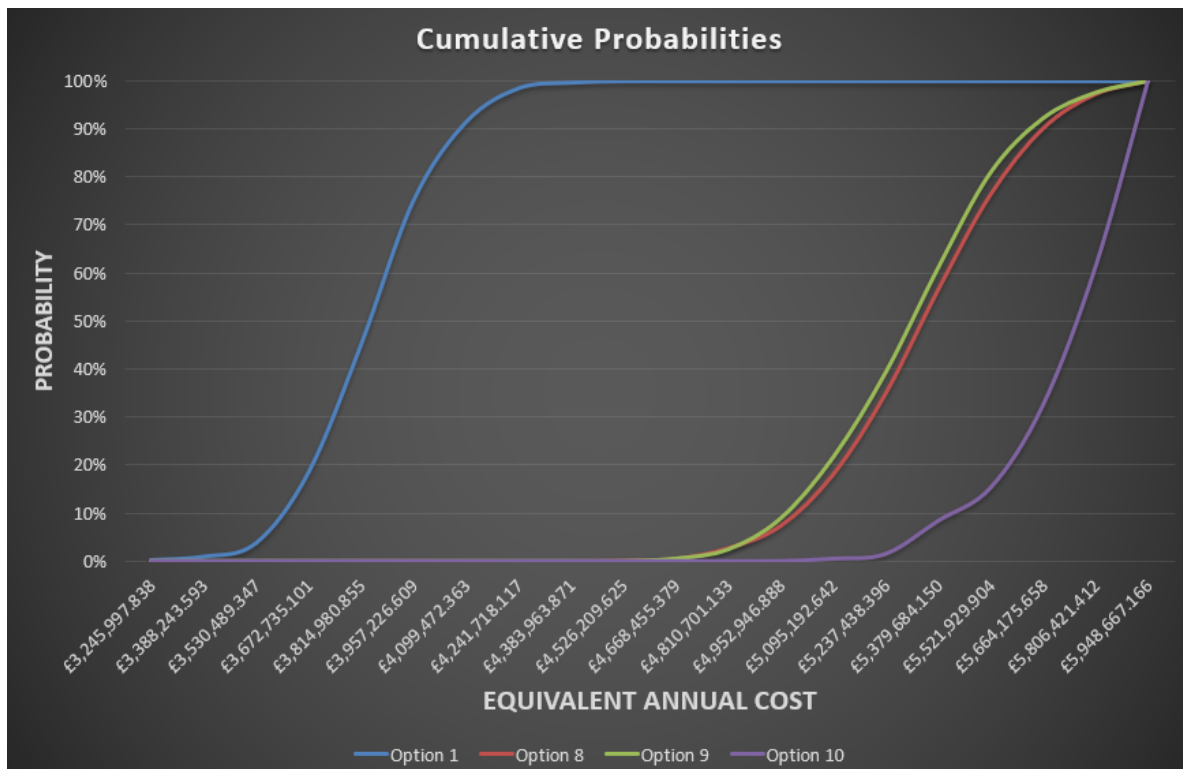


Figure 5: Cumulative Distribution Function



As can be seen from the first chart each option displays the typical bell-shaped curve indicative of a normal distribution. The probability of any value occurring within this distribution can be read off the chart. Both charts clearly indicate that option 6 (red line) has the lowest annual equivalent cost while option 8 (green) line has the highest annual cost.

The results also indicate that there is a:

- 91.96% probability that the net present cost of option 6 will fall between £100m and £120m.
- 69.19% probability that the net present cost of option 7 will fall between £100m and £120m: and
- 63.63% probability that the net present cost of option 8 will fall between £100m and £120m.

3.10 Qualitative Benefits Appraisal

All the benefits from the OBC were grouped into four categories, and the benefit groups were then weighted by the project team to provide an assessment against the five options.

Table 23 - Benefit Group Weighting

Benefit Groups	Example of Benefits (<i>info in brackets = how achieved</i>)	Weight
Standards and Breadth of Education	<p>Improved learning outcomes for learners and families. (Achieved through better facilities and learning environments)</p> <p>Improved levels of recruitment, quality, retention, and reputation of staff. (New environments will assist this)</p> <p>Opportunities to benefit from a wider range of learning opportunities and skills. (Better learning facilities)</p> <p>Access to a wider range of teaching materials. (State of the art ICT and other emerging technologies) (Better learning facilities)</p>	30%
Standards of Estate and Facilities	<p>Zoned and bespoke facilities for flexible community use. (Design)</p> <p>Improved energy efficiency of estate. (Through environmental initiatives)</p> <p>Increased flexibility of accommodation to meet demands and expectations of stakeholders. (Flexibility through design)</p> <p>More efficient use of premises / estate. (Efficiency through design)</p> <p>Improved accessibility to all areas of the site. (School site disparate and layout poor)</p>	15%
Financial Sustainability	<p>Creation of new opportunities for revenue generation. (New community focused facilities)</p> <p>Reduced building operating costs. (Through environmental initiatives)</p> <p>Ensure the viability of educational provision. (In the longer term, as other local school estate deteriorates)</p> <p>Ensure the viability of leisure provision. (Through removal of extensive backlog maintenance liabilities)</p>	15%
A Wales of cohesive communities	<ul style="list-style-type: none"> Same site intra-generational opportunities for increased community wellbeing. (Whole community access to facilities) 	10%
A Wales of vibrant culture and thriving Welsh language	<ul style="list-style-type: none"> Promoting WG aspirations for one million Welsh Language speakers by 2050. (Welsh Medium Language education within a 21st Century School setting) 	10%
A globally responsible Wales	<ul style="list-style-type: none"> Low carbon strategies at heart of the new developments to reduce energy use and promote resource efficiency. (Passivhaus design) 	20%

Each of the benefit groups were scored on a range of 0-10 for each option. These scores were agreed by the workshop participants to confirm that the scores were fair and reasonable.

Table 24 – Benefits Appraisal

Benefit Group	Weight	Maximum	Raw	Weighted
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		Option 1	Option 8	Option 9	Option 10	Option 1	Option 8	Option 9	Option 10	
Standards of Education	30	10	6	9	9	10	180	270	270	300
Estate and facilities	5	10	4	8	9	10	20	40	45	50
Financial Sustainability	25	10	8	9	9	5	200	225	225	125
A Wales of cohesive communities	10	10	6	9	9	9	60	90	90	90
A Wales of vibrant culture and thriving Welsh language	10	10	8	9	9	9	80	90	90	90
A globally responsible Wales	20	10	6	9	9	9	120	180	180	180
Total	100		38	53	54	52	660	895	900	835
Rank			4	2	1	3	4	2	1	3

3.11 Risk Appraisal

The workshop assigned the risk scores shown in the following table based on participants' judgment and assessment of previous procurements. The range of scales used to quantify risk followed the corporate risk assessment process. The likelihood and impact scores are summarised below:

Probability:

- Low = 1 - Not likely to occur or may happen once every 20 years.
- Medium = 2 - Possible or may happen within 10 years.
- High = 3 - Likely or may happen once a year.
- Very High = 4 - Certain or happens several times a year.

Impact:

- Low = 1.
- Medium = 2.
- High = 3.
- Catastrophic = 4.

The likelihood is multiplied by the impact score to provide a "risk score." The main risks fall into three categories namely Service Risk (SR), Business Risk (BR) and External environmental risk (EER).

Table 25 – Risk Appraisal

No	Summary of Risk	Category	Option 1	Option 8	Option 9	Option 10
1.	The risk that there will be an undermining of customer's/media's perception of the organization's ability to fulfil its business requirements – for example, adverse publicity concerning an operational problem.	SR	8	8	4	4
2.	Continuity of 21st century funding not sustained by mainstream funding.	SR	0	3	3	3
3.	Newly redeveloped or built school may attract pupils from other schools or catchment areas.	EER	0	4	4	4
4.	Delay in WG approval of FBC.	SR/ EER	0	0	0	0
5.	Availability of Capital funding, both in terms of Capital allocation from WG and prudential borrowing.	SR	12	4	4	8
6.	Feasibility unproven - in terms of SIS/Ecology.	SR/ EER	0	0	0	0
7.	Lack of stakeholder support for scheme.	SR	25	9	2	2
8.	Lack of adequate revenue funding stream.	SR	1	4	3	4
9.	Lack of timely decision making at PCC.	SR	0	1	1	1
10.	Unsuccessful schools' reorganisation and consultation process. Low level of public support for scheme.	EER	0	0	0	0
11.	Failure to develop and implement plan and processes to manage staff and learners prior, during and post commissioning of the new/ existing/alternative facilities.	SR	1	1	1	1
12.	For any number of unforeseen reasons, arising from risk and uncertainty, the construction costs increase beyond original cost estimates.	SR/ EER	6	4	4	5
13.	Failure to gain planning and environmental approvals or acquire land for new construction.	SR/ EER	0	4	4	6
14.	Curriculum developed fails to engage learners - inadequate facilities to deliver broader curriculum.	SR	12	1	1	1
15.	Statutory consultation fails.	EER	0	0	0	0
16.	Health and Safety - e.g., Injuries/incidents during construction leading to delays/injury investigation/claims for compensation/ prosecution.	SR	5	5	5	5
17.	The risk that design cannot deliver the services to the required quality of Educational Provision standards.	SR	12	3	3	4

No	Summary of Risk	Category	Option 1	Option 8	Option 9	Option 10
18.	The risk that the construction of physical assets is not completed on time, to budget and to specification.	SR	2	2	2	2
19.	The risk that the quality/quantity of initial intelligence (for example, preliminary site investigation) will affect the likelihood of unforeseen problems occurring.	SR	8	2	2	2
20.	The risk arising in accommodation projects relating to the need to decant staff/clients from one site to another.	SR	0	0	0	0
21.	The risk that the nature of the project has a major impact on its adjacent area and there is a strong likelihood of objection from the public.	SR	1	2	2	2
22.	The risk that can arise from the contractual arrangements between two parties – for example, the capabilities of the contractor/ when a dispute occurs.	SR	1	1	1	1
23.	The risk that the quantum of service provided is less than that required under the contract.	SR	0	1	1	1
24.	The risk that the demand for a service does not match the levels planned, projected, or assumed.	SR	1	1	1	1
25.	The risk that actual community usage of the service varies from the levels forecast as a benefit.	SR/ EER	1	1	2	5
26.	The risk that changes in technology result in services being provided using sub-optimal technical solutions.	SR/ EER	1	1	1	1
27.	The risk relating to the uncertainty of the values of physical assets at the end of the contract period.	EER	0	2	2	2
28.	Profile of capital expenditure incorrect.	SR/ EER	2	2	2	2
29.	The risk that project outcomes are sensitive to economic influences – for example, where actual inflation differs from assumed inflation rates.	EER	1	1	1	1
30.	The risk that policy & legislative change increases costs. This can be divided into secondary legislative risk (for example, changes to corporate taxes) and primary legislative risk (for example, specific changes which affect a particular project).	EER	0	1	1	1
31.	A change in political climate at WG level.	EER	1	4	4	4
32.	A change in political climate at County level.	EER	1	4	4	5

No	Summary of Risk	Category	Option 1	Option 8	Option 9	Option 10
33.	Outcome of internal decision making. (i.e., Decisions made against officer recommendations)	SR	0	0	2	2
34.	Loss of experienced staff	SR	2	2	2	2
35.	The risk that the timescales for the new school will be delayed as a result of Covid-19 impact on the construction process and on the successful contractor's supply-chain.	EER	3	9	9	9
36.	The risk that the cost of materials may increase as a result of reduced supply due to Covid-19.	EER	3	6	6	6
Total			102	93	84	95
Rank			4	2	1	3

Option 1 has a considerably higher risk profile than both do something options primarily due to its unacceptability to local stakeholders and the current sites dual location which affects effective working and teaching practices and also the ability of the school to positively affect the delivery of the curriculum. Option 9 has a slightly lower risk profile due to its ability to more widely reflect the needs of the local population through the additional provision of community facilities.

3.12 The Preferred Option

Table 26 – Final Appraisal Scores

Evaluation Results	Option 1	Option 8	Option 9	Option 10
Economic appraisals	1	3	2	4
Benefits appraisal	4	2	1	3
Risk appraisal	4	2	1	3
Total Points	9	7	4	10
Overall Ranking	3	2	1	4

At this SOC/OBC stage each of options 8, 9 and 10 are possible. However, due to the mix of additional benefits and lower risk profile facilitated by the inclusion of community accessible facilities **option 9** is identified as the preferred solution.

4 Commercial Case

4.1 Procurement Method

4.1.1 Procurement Strategy

Three procurement strategy routes were considered in Powys County Council's 21st Century Schools Strategic Outline Programme Commercial Case. Considerations included the following:

- Public/Private partnerships (including via the Mutual Investment Model).
- Joint venture with the private sector.
- Conventional procurement routes utilising framework contractors.

Consideration of these procurement routes concluded that a Joint Venture with the private sector and the Public/Private Partnerships route were unfeasible in this instance of the following reasons:

- i. There was no commitment to further commercial opportunities of significant scale that could be offered to a separate private entity. This would reduce the commercial appeal of entering into a formal partnership or joint venture with Powys County Council.
- ii. Both Private/Public Partnerships and Joint Ventures are more complex and time consuming to set up and manage. Powys only has limited major construction projects to offer, therefore it is less likely that the fixed costs involved in setting up the partnerships would be recovered through down the line savings or savings achieved through quantities of scale.
- iii. Given the scale of development required within the Council's Band A and B 21st Century Schools Programme, it is felt that the additional costs incurred by the complexities of Public/Private partnerships or a Joint Venture with the private sector will not be justified by the potential benefits from entering into these arrangements.

The Council has good experience of working with contractor frameworks and has achieved positive outcomes using such frameworks. The Council has therefore concluded that the optimum procurement route will be to use the revised SEWSCAP framework that was re-launched in June 2019 (SEWSCAP 3). The benefits of utilising contractors from this existing Contractor Frameworks list are as follows:

1. Consultation and design development will be managed and coordinated through Powys County Council's Property and Design Service (Consultancy). The project team will remain actively involved throughout the duration of the project, fulfilling the intelligent client role once the project is passed over to the successful contractor, thus ensuring continuity of professional staff representing PCC during all stages of the project programme.
2. Compliant with EU procurement directives and the Public Contract Regulations (2014), offering a swift route to market and opportunities for early contractor involvement.
3. The framework is free to use, offering a variety of contracts, pricing models and the potential for further savings achieved via mini competition.

4. The new SEWSCAP Property Construction Framework is divided into the following lots:
- Lot 1: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby.
 - Lot 2: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Torfaen County Borough Council, Blaenau Gwent County Borough Council, Monmouthshire County Council, Caerphilly County Borough Council, or other Potential Employers based or operating near those areas.
 - Lot 3: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Rhondda Cynon Taf County Borough Council, Merthyr Tydfil County Borough Council and Bridgend County Borough Council and any Participating Authorities based or operating near those areas.
 - Lot 4: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Vale of Glamorgan Council, The County Council of the City of Cardiff Council, Newport City Council, or other Potential Employers based or operating near those areas.
 - Lot 5: Provision of Construction services, extensions, and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby to include new build.
 - Lot 6: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - All Potential Employers.
 - Lot 7: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£3,000,001 to £5,000,000) - All Potential Employers.
 - Lot 8: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£5,000,001 to £10,000,000) - All Potential Employers.
 - Lot 9: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£10,000,001 to £25,000,000) - All Potential Employers.
 - Lot 10: Provision of Construction services to include new build, extensions, and refurbishment under traditional or design and build with all associated works – (£25,000,001 to £100,000,000) – All Potential Employers.

In this instance the Council propose to use Lot 10 (£25M - £100M).

The Core principles of the framework are the over-riding objectives guiding the Authority and the Contractor in the operation of this Framework Agreement, and in entering into and performing Call-Off Contracts. The Authority and the Contractor hereby agree:

- To work together and with the Potential Employers, Employers, and their advisers in good faith and in a spirit of mutual trust and co-operation.
- To act in a co-operative and collaborative manner so as to achieve and advance the relevant Construction Project.
- To share information honestly and openly.
- To highlight any difficulties at the earliest possible opportunity.

The Authority and the Contractor agree to work together in accordance with the terms of this Framework Agreement and in co-operation and collaboration with the Potential Employers, Employers, and their advisers, to achieve the successful delivery of a series of Construction Projects and in particular, the Core Principles.

4.1.2 Current Design Position

The Council is currently engaged with an external design team. This design team were taken on to progress the scheme post Dawnus Construction Ltd Administration. Given the extent of design work completed to date, the Council owns a significant portion of design information relating the scheme. This design information will be passed to the contractor following the Mini Completion for further development and completion. The incoming contractor will take responsibility for the design.

4.1.3 Award methodology

Within this framework two methods may be used by Participating Authorities to award contracts under the framework, as summarised below (Direct award applies to Lots 1-7 and 11 only):

Lot 10 – Contract Option.

1. Mini-tender – Contractors in the relevant Lots will be invited to tender against a range of quality and pricing criteria. This method will apply to all Lots.
2. Early Contractor Involvement mini-tender - Early Contractor Involvement allows the Employer to engage with a Contractor via a contract to carry out services such as review of existing design information and assisting in planning and business cases etc. This process known as a 2-stage design and build requires bidders to submit an overall price for the whole of the works including in this case the completion of the design (extent yet to be determined). This will form the basis for the ECI appointment and will be discussed and refined during ECI with the aim of agreeing prices or a contract sum within the price envelope prior to the start of the construction stage.

Under this mini tendering process, the framework contractors will be asked to price scheme specific Preliminaries and Design Costs including a capped Target Cost as a guide. All other

costs would be in accordance with their (already tendered) framework submission. Under the NEC4 Professional Services Contract and NEC4 Engineering & Construction Contract –

The Council is currently assessing its Contract Options under NEC4. These will be determined following further market engagement and internal review.

Currently under consideration:

Option A: Priced Contract with Activity schedule. The interim valuations will be paid on actual invoiced costs for labour, plant, materials and sub-contractors plus overheads and profit with a gain/pain percentage share on completion.

Option C: Target Cost with Activity Schedule – Outturn financial risk are shared between the Client and the Contractor in an agreed portion.

The following broad principles are to be pursued, in the area of contractor incentivisation in order to help to implement smart procurement. Their implementation is subject only to agreement on the manner of their application in specific negotiations, and further formal consultation on appropriate contract terms and conditions:

- Making best use of competition at prime and sub-contract level to meet requirements and achieving value for money.
- Making the best use of effective pricing mechanisms to reflect the circumstances of the procurement will be used to promote incentivisation of performance.
- The Council and Industry have common objectives in trying to ensure that incentives produce demonstrable value for money (VFM) benefits for Powys and sustained shareholder value for Industry.
- Risks and rewards should be shared between the Council and Industry in an equitable manner.
- Risk should be owned by those best placed to manage it.
- The prospect of longer-term commercial relationships in return for good performance should be a major spur to good performance supported by incentivisation arrangements.
- The benefits of incentivisation arrangements should apply to the sub-contract supplier base and continue to be nurtured to achieve VFM.
- Gain-sharing opportunities should be actively explored and pursued wherever possible.
- Partnering arrangements for longer term contracts must include a framework for continuing incentivisation.
- Benchmarking of performance against recognised best in class processes and practises will aid assessment of achievement against incentivisation measures.
- Sanctions for unsatisfactory performance against the contract requirement need to be available and will be used where appropriate.
- Sharing of future contract savings in subsequent contracts.

The Core principles of the framework are the over-riding objectives guiding the Authority and the Contractor in the operation of this Framework Agreement, and in entering into and performing Call-Off Contracts. The Authority and the Contractor hereby agree:

- To work together and with the Potential Employers, Employers, and their advisers in good faith and in a spirit of mutual trust and co-operation.
- To act in a co-operative and collaborative manner so as to achieve and advance the relevant Construction Project.
- To share information honestly and openly.
- To highlight any difficulties at the earliest possible opportunity.

4.2 Required Services

4.2.1 The required service streams:

A new 4 to 18 all through school with 540 places, plus early years and SEN / Wellbeing facilities, public library, community room / facilities.

4.2.2 The specification of required outputs:

- Primary Objectives / Employers Requirements to achieve:
 - Passivhaus low energy design standards
 - Net Zero Carbon. Net Zero Carbon (NZC) in operation & Embodied Carbon below 800 kgCO₂/m² in line with the required aims of Welsh Government' Sustainable Communities for Learning Programme.
 - BREEAM Excellent
- Completion of design to achieve primary scheme outputs stated above under NEC 4 Professional Services Contract.
- Construction of new school in accordance with works information and employers' requirements under NEC 4 Engineering and Construction Contract (ECC)

Table 27 – Risk category

Risk Category	Potential allocation		
	Public	Private	Shared
Design risk			✓
Construction and development risk		✓	
Transition and implementation risk			✓
Availability and performance risk		✓	
Operating risk	✓		
Variability of revenue risks	✓		
Termination risks		✓	
Technology and obsolescence risks	✓		
Control risks	✓		
Residual value risks	✓		
Financing risks	✓		
Legislative risks			✓

Other project risks			✓
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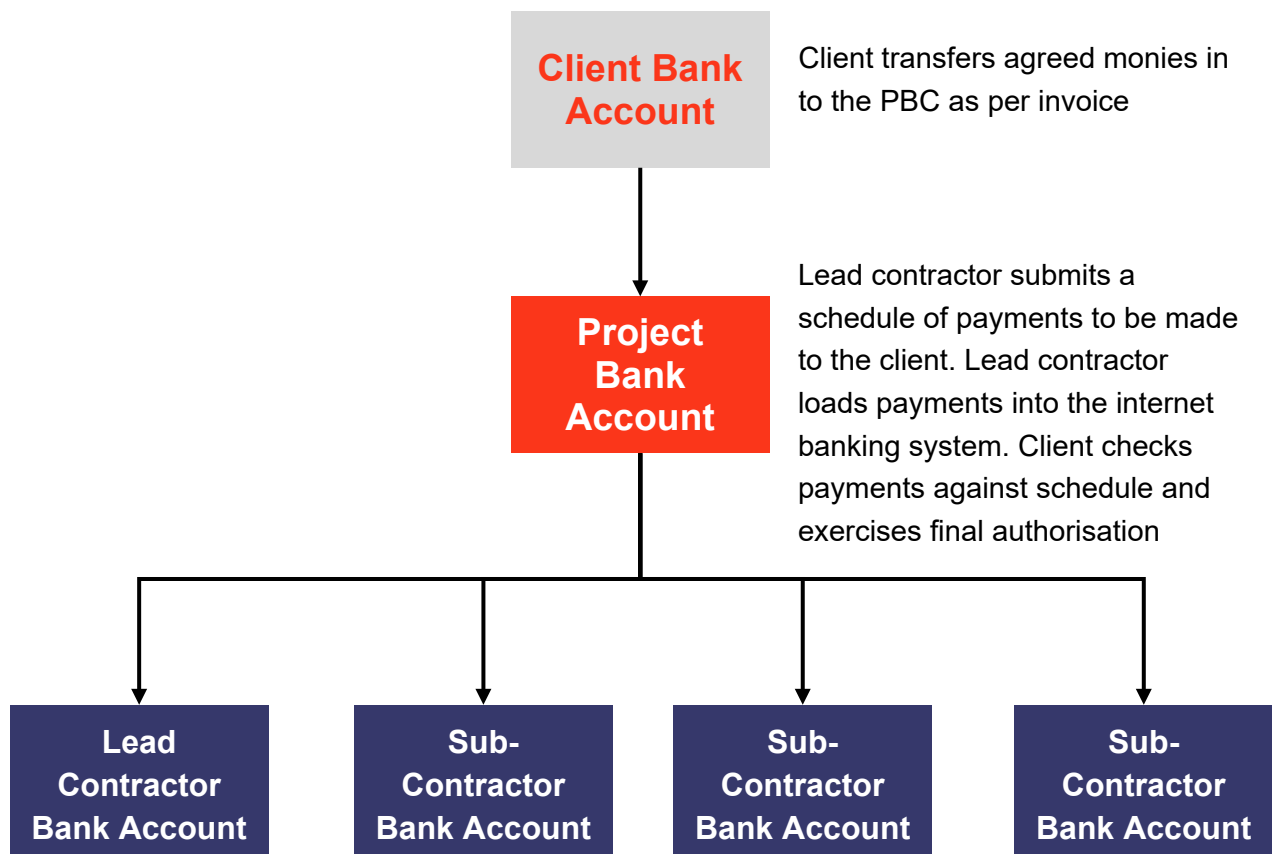
4.3 Project Bank Accounts (PBAs)

Details around the approach to PBAs will be developed as this proposal moves through the various approval gates. This will include details of:

- Who will approve the PBA documentation and how? For example, who will approve and sign the Deeds of Trust, Deeds of Adherence / Joining Deed, Bank Mandate.
- Who will agree payments due to the lead contractor and each of their named suppliers and how?
- Who will be responsible for paying money into the PBA and authorising payments out?
- Who will agree why certain supply chain members may not be paid directly from the PBA and the criteria this will be based upon?
- It is important that the benefits of PBAs are understood, and prospective tenderers understand that they should communicate these benefits down the supply chain, to maximise sub- contractor sign up to the PBA.
- To support this, a briefing pack and information sheet for tenderers outlining both the benefits and requirements of using a PBA.

Additionally, at tender stage, the procuring party will include clauses in the ITT documentation, referencing the use of PBAs. These clauses will include specific requirements on how the PBA will operate.

Figure 6: PBA money route



4.4 Community Benefits

4.4.1 Agreed schedule

The inclusion of community benefits/social requirements within contracts will ensure that wider social and economic issues are considered when tendering construction and development work. The Council particularly considers that the works afford an ideal opportunity to the contractor to enhance employment prospects and skills through the recruitment, training, and retention of economically inactive people at a disadvantage in the labour market.

Powys County Council is committed to a performance and evidence-based approach to Social Value. Based on the National TOMs (Themes, Outcomes and Measures) developed by the Social Value Wales Portal, bidders will be required to propose credible targets against which performance will be monitored.

4.4.2 Delivery of agreed targets

Powys County Council recognises that measuring and delivering Social Value requires flexibility and a collaborative approach. Agreed Social Value commitments may require a certain amount of refinement as a result.

A key requirement is the willingness of the contracting partner to work openly and transparently with the Authority whilst bearing in mind that the overall value of Social Value commitments made must be delivered by the winning contractor.

Based on previous experience, for a project of this value, we would expect the successful contractor to as a minimum:

- Deliver a Meet the Buyer Event to raise awareness of project to local supply chain;
- Use Sell2Wales to advertise opportunities.
- Conduct pupil interactions.
- Spend at least 85% of contract spend in Wales.
- Divert 85% of waste from landfill.
- Conduct a minimum of 3 Community initiatives throughout the duration of the project.

5 Financial Case

5.1 Project Summary Costs

Table 28 – Key metrics

New Build % (Area)	100%
Description of work & any unusual constraints	Zero-carbon in use.
# Pupil Places	540 + 48 Nursery
# SEN Places	30 places ALN Centre will be established to cater for primary and secondary phase pupils, some who will come from out of catchment
Total # Places	618
# Storeys (including basement)	3
Delivered through Regional Framework?	SEWSCAP 3
Contract period in weeks	Approximately 72
GFA (M2)	7058
# Trainee and apprenticeship opportunities	50
Use of local subcontractors as a % of total cost	To be agreed with contractor at tender stage

5.2 Breakdown of Capital Costs

Table 29 – Breakdown of capital costs

Project Costs	
Capital Cost	£40,595,351
Optimism Bias	£5,277,396
Risk	£3,247,628
VAT (only to be included where non-recoverable by applicant)	N/A
Total Project Cost (inclusive of optimism bias and risk)	£49,120,375
Total (It is assumed that optimism bias and risk will be fully mitigated and that the capital build cost is the actual cost upon which the intervention rate will apply.)	
Funding Body Intervention Rate	(65%)

5.3 Cost Template

Table 30 – Elemental Breakdown

	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	Total	Cost/m2	Cost/Pupil
	£	£	£	£	£	£	£	£
Development								
Site investigation	£143,438					£143,438	£20.32	£232.10
Land acquisition	£280,000					£280,000	£39.67	£453.07
Construction								
Substructure	£559,332	£372,888				£932,221	£132.08	£1,508.45
Superstructure		£3,161,646	£4,742,469			£7,904,115	£1,119.88	£12,789.83
Abnormals				£835,217	£556,811	£1,392,028	£197.23	£2,252.47
Externals			£2,461,616	£3,077,019	£615,404	£6,154,039	£871.92	£9,957.99
Internal finishes		£381,386	£381,386	£190,693		£953,465	£135.09	£1,542.82
Services		£864,838	£3,363,258	£576,559		£4,804,654	£680.74	£7,774.52
Preliminaries		£635,453	£635,453	£635,453	£211,818	£2,118,176	£300.11	£3,427.47
Overhead/Profit		£294,022	£294,022	£294,022	£98,007	£980,074	£138.86	£1,585.88
Client costs								
ICT			£67,355	£606,192		£673,547	£95.43	£1,089.88
FFE				£645,314		£645,314	£91.43	£1,044.20
Design Fees	£2,092,120	£284,115	£129,143	£51,657	£25,829	£2,582,864	£365.95	£4,179.39
Professional fees	£538,818	£230,922	£230,922	£256,580	£25,658	£1,282,899	£181.77	£2,075.89
Contingencies	£475,513	£951,027	£1,426,540	£1,426,540	£475,513	£4,755,135	£673.72	£7,694.39
Client costs	£492,541	£84,921	£84,921	£127,381	£59,445	£849,208	£120.32	£1,374.12
Inflation		£1,243,252	£1,243,252	£1,243,252	£414,417	£4,144,174	£587.16	£6,705.78
Total Cost	£4,581,762	£8,504,470	£15,060,337	£9,965,880	£2,482,902	£40,595,351	£5,751.68	£65,688.27

5.4 Impact on the Organisation's income and expenditure account

Table 31 – Impact on the organisation's income and expenditure account

£s	Total Cost	Years (years 9-59 same as year 8, except for Lifecycle costs, which are shown from year 9, at 5-year periods)								
		0	1	2	3	4	5	6	7	8
		22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31
Preferred way forward:										
Capital Costs	£40,595,351	£4,581,762	£8,504,470	£15,060,337	£9,965,880	£2,482,902				
Lifecycle Costs	£25,415,958									£.360,940
Revenue Costs	£179,688,540	£2,931,165	£2,931,165	£2,931,165	£2,970,533	£2,998,652	£2,998,652	£2,998,652	£2,998,652	£2,998,652
Cash Releasing Benefits	-£541,000	£0	£0	£0	£0	£0	-£541,000	£0	£0	£0
Total	£245,158,849	£7,512,927	£11,435,635	£17,991,502	£12,936,413	£5,481,554	£2,457,652	£2,998,652	£2,998,652	£3,359,592
Funded by:										
Existing Revenue	£175,869,900	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165
Total Existing	£175,869,900	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165	£2,931,165
Additional Funding Req.	£69,288,949	£4,581,762	£8,504,470	£15,060,337	£10,005,248	£2,550,389	-£473,513	£67,487	£67,487	£428,427
Cumulative Funding		£4,581,762	£13,086,232	£28,146,569	£38,151,817	£40,702,206	£40,228,693	£40,296,180	£40,363,667	£40,792,094

5.5 Cost Build Up

Table 32 – Cost builds up

£s	Total Cost	Years (years 9-59) same as year 8, with exception of Lifecycle costs, occurring at 5-year periods)								
		0	1	2	3	4	5	6	7	8
		22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31
CAPITAL COSTS										
New Build Capital Cost	£40,595,351	£4,581,762	£8,504,470	£15,060,337	£9,965,880	£2,482,902				
Lifecycle Cost	£25,415,958									£.360,940
Capital Costs Total	£66,011,309	£4,581,762	£8,504,470	£15,060,337	£9,965,880	£2,482,902				
REVENUE COSTS										
School Funding Formula	£179,688.540	£2,931,165	£2,931,165	£2,931,165	£2,970,533	£2,998,652	£2,998,652	£2,998,652	£2,998,652	£2,998,652
Revenue Costs Total	£179,688.540	£2,931,165	£2,931,165	£2,931,165	£2,970,533	£2,998,652	£2,998,652	£2,998,652	£2,998,652	£2,998,652
Total Costs	£245,699,849	£7,512,927	£11,435,635	£17,991,502	£12,936,413	£5,481,554	£2,998,652	£2,998,652	£2,998,652	£3,359,592
BENEFITS										
Capital Receipts	-£541,000						-£541,000			
Benefits Total	-£541,000						-£541,000			
Cost Net Cash Savings	£245,158,849	£7,512,927	£11,435,635	£17,991,502	£12,936,413	£5,481,554	£2,457,652	£2,998,652	£2,998,652	£3,359,592

Lifecycle costs incurred as follows: Year 13: £531k, Year 18: £4.748M, Year 23: £1.89M, Year 28: £915k, Year 33: £3.495M, Year 38: £361K, Year 43: £6.922M, Year 48: £4.748M, Year 53: £1.085M, Year 58: £361k.

5.6 Overall Affordability and Balance Sheet Impact

A balance sheet asset addition of £40,595,351 is made for the new school. Short term additional funding is required of £40,595,351 for years 0 through 5 excluding retained risks and optimism bias.

There is also an ongoing requirement for revenue funding of £67k per annum from the inception of the new build school because of the funding formula calculation. In addition to this, it is anticipated that there will be a cost increase for rates payable of £86k.

It should be noted that these formula calculations do not take account of the substantial benefits achievable through the introduction of Passivhaus and other net zero carbon technologies and design standards as outlined in the economic case. While this is counterintuitive, the direct financial beneficiary of these savings is likely to be the school.

The Band B submission has been scrutinised and assessed by the Council's Section 151 Officer for affordability in light of the 65% programme intervention rate.

The Council will meet the 35% contribution required to support the overall programme in Band B through prudential borrowing.

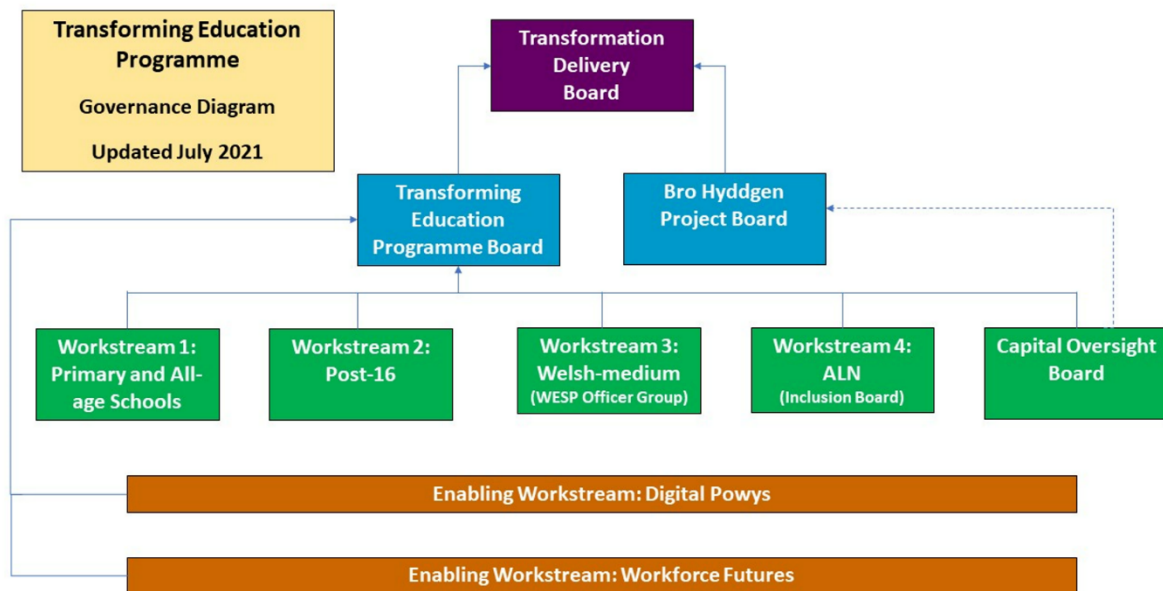
6 Management Case

6.1 Programme Management Arrangements

This scheme is a constituent of Powys County Council’s Transforming Education Programme and has been identified within that Programme as a priority. It will be managed in accordance with best practice in programme and project management principles – MSP and PRINCE2 to provide a systematic and effective delivery framework.

Overall corporate governance for the Transforming Education Programme is in accordance with the governance arrangements for the Council’s Transformation Programmes.

Governance arrangements for the Transforming Education Programme are set out in the diagram below:



6.1.1 Project Structure

The reporting and governance arrangements for this project are as follows:

- Project Team, via the Client Lead, prepare monthly highlight reports to the Programme Manager and Service Manager.
- The Service Manager Transforming Education presents summary reports to the Transforming Education Programme Board and Schools Capital Oversight Board meetings on a monthly basis.
- On an exception basis only, the Project Team will report key strategic risks and issues to Programme Board for resolution.

The project will be managed in accordance with the general principles of MSP/PRINCE2 methodology.

The Project Team will remain actively involved throughout the duration of the project fulfilling the intelligent client role once the project is passed over to the successful contractor, thus ensuring continuity of professional staff representing PCC during all stages of the project programme.

Figure 7: Project Structure

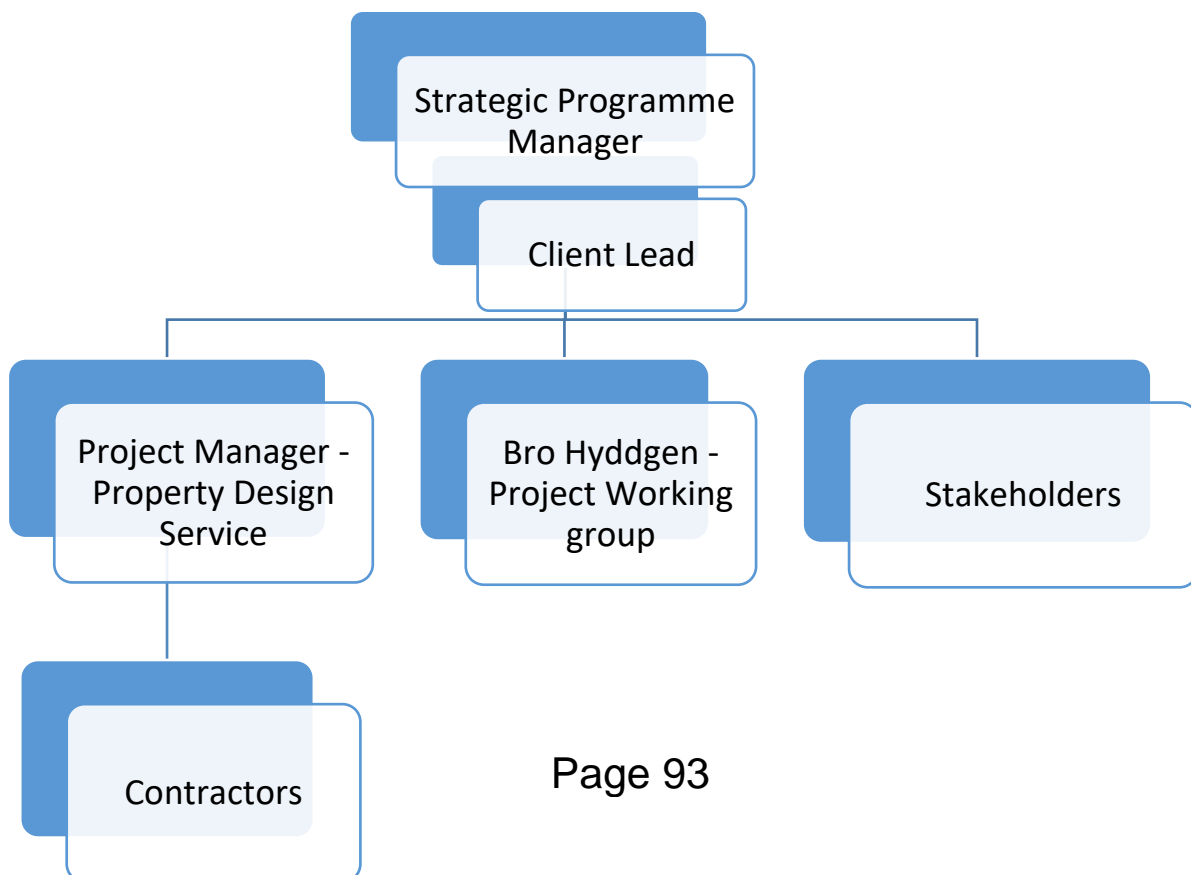


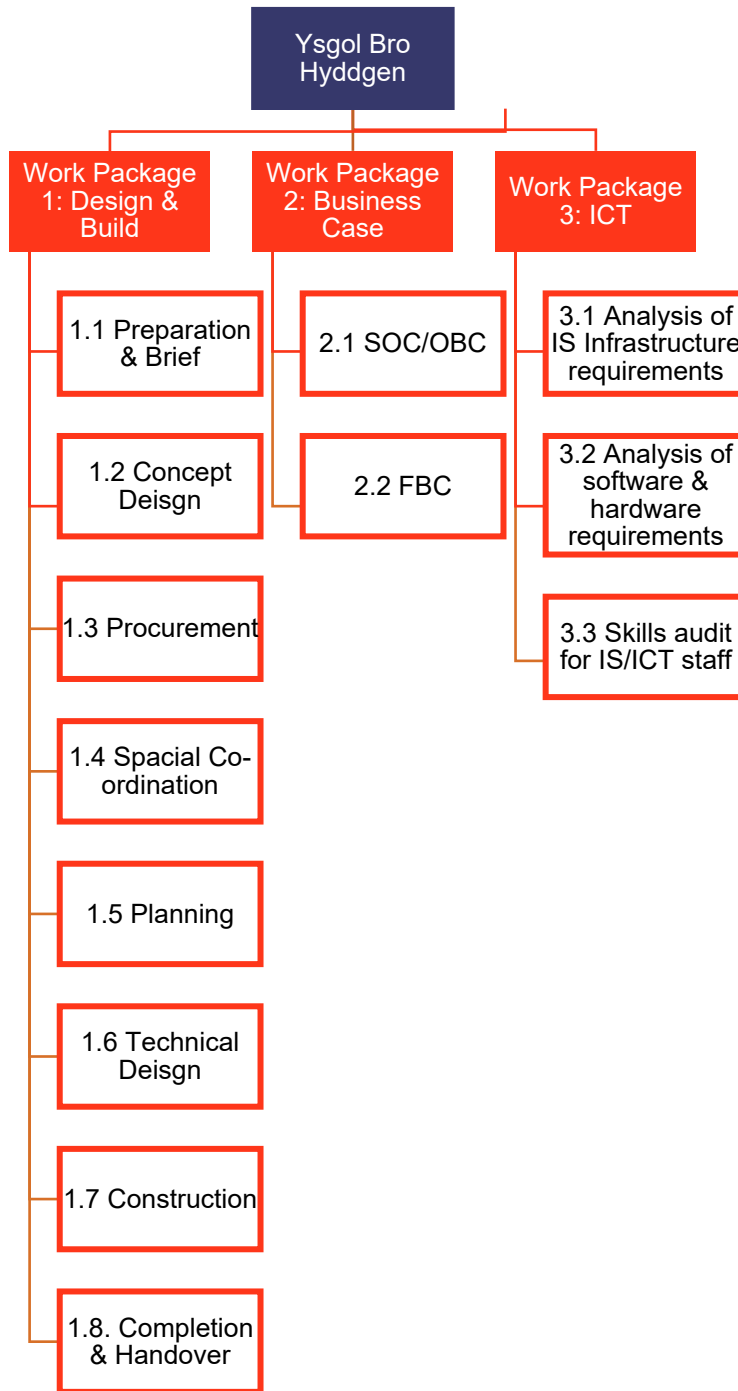
Table 33 – Project team

Name	Project Role
Melany Price	Client Lead
Ian Pilcher	Project Manager Property Design Service
Amy Jones	Finance Lead (Revenue)
Dafydd Jones	Head Teacher
James Chappelle	Finance Lead (Capital)
Gary Leatherland	Procurement Specialist
Lee Evans	Communications Team Manager
Simon Kendrick	Principal Engineer Highways

6.1.2 Project Deliverables

The following (abridged) product breakdown structure depicts the structure of the project:

Figure 8: Product breakdown structure



6.1.3 Outline Project Plan

There are currently three options for the programme to deliver the scheme, each differing on the key dependency of when the scheme is tendered. This could potentially occur at three different junctures along the RIBA stage process, with each option offering different advantages and disadvantages to the overall scheme. At this early stage in the design process, it is considered that the most likely point at which the Council will engage the market

is at the end of RIBA stage 3, although the programmes for all options are set out below pending a final decision by the Programme and Project Board.

Table 34 – Project Plan, tender end of RIBA stage 2

Date	Action/Milestone
Sept 22	End of RIBA 1 Feasibility / Redesign
Oct 22	SOC / OBC- Approval
Oct 22	End of RIBA 2
Nov 22	Publish Tender
March 23	Contract Award
Aug 23	End of RIBA 3
Jan 24	Planning Approval
Jan 24	End of RIBA 4 - Technical Design
Feb 24	WG Approval
Feb 24	RIBA 5 - Phase 1 New Build (Start on Site)
Nov 25	School in Open
Nov 25	RIBA 5 - Phase 2 and 3, Demolition and Associated Works (Start)
August 26	Project Completion

Table 35 – Project Plan, tender end of RIBA stage 3

Date	Action/Milestone
Sept 22	End of RIBA 1 Feasibility / Redesign
Oct 22	SOC / OBC- Approval
Oct 22	End of RIBA 2
Feb 23	End of RIBA 3
July 23	Planning Approval
July 23	Publish Tender
Oct 23	Contract Award
May 24	End of RIBA 4 - Technical Design
June 24	WG Approval FBC
July 24	RIBA 5 Phase 1 New Build (Start On Site)
May 26	School in Use
May 26	RIBA 5 - Phase 2 and 3, Demolition and Associated Works (Start)
Jan 27	Project Completion

Table 36 – Project Plan, tender end of RIBA stage 4

Date	Action/Milestone
July 22	RIBA 1 Feasibility Redesign

Oct 22	SOC / OBC- Approval
Oct 22	End of RIBA 2
Feb 22	End of RIBA 3
July 23	Planning Approval
July 23	RIBA 4 - Technical Design
July 23	Publish Tender
Oct 23	Contract Award
Nov 23	WG Approval FBC
Dec 23	Construction Phase
Oct 25	School in Use
Nov 25	RIBA 5 - Phase 2 and 3, Demolition and Associated Works (Start)
May 26	Project Completion.

6.1.4 Benefits Realisation

An example of the project benefits register is included in the table below. This table describes who is responsible for the delivery of specific benefits, how and when they will be delivered and the required counter measures, as required.

Table 37 – Proposed Benefits Realisation Plan Structure

Benefit	Owner	Target	Method of measurement	Responsibility for	Timing of measurement	Outcome

6.2 Risk Management

All project risks are managed via the Council's JCAD risk management system.

JCAD is a 'living document' and reviewed and amended (where required) during Project Team meetings or risk workshops where the Team manage the identification, monitoring, updating, control, and mitigation of project risks. The framework and plan of the risk register involves a rated table format. The risk is described, and the date of its identification noted. An initial risk rating is made, and the probability and impact of the risk evaluated, followed by a residual risk rating column. The effects and impact of risk can involve elements such as environment, time, quality, cost, resource, function or safety and regular meetings will be held to review all aspects. Within the format there will also be the facility for proposals to mitigate and manage, identifying the control strategy, risk owner and the current risk status.

The risks and issues identified within this project will be cross referenced with the risks/issues held by the Programme Board so that cross cutting issues can be mitigated safely.

The total risk score for each risk will be calculated by multiplying the probability score (between 1-4 with 4 being certain) and impact score (between 1-4 with 4 being project failure) and all risks scoring 16 and above will be referred to the Programme Board for decision. The risk tolerance line for the project is illustrated in the following table.

6.3 Change and Contract Management

The main aim here is to manage proposed changes to the culture, systems, processes, and people working to establish the best option for the council. Change management is not about the provision of the best option but instead focuses on those actions that are necessary to make the best option a working success.

Managers responsible for the key areas will adopt appropriate project management disciplines to meet specific responsibilities. The individual activities may be projects in their own right or be work streams within the overall project.

Planning has been developed for all activities within this change management process through the identification of key outcomes and actions required to ensure successful delivery. Timescales for carrying out such actions, the resources required, and where required, the need for additional resources, have also been determined.

6.4 Gateway Reviews

The Council confirm that it is prepared to complete a Gateway review of the programme at Welsh Government convenience. Further Gateway reviews may then be undertaken during the remaining life of the programme.

6.5 Post Project Evaluation

The outline arrangements for Post Implementation Review (PIR) and Project Evaluation Review (PER) have been established in accordance with best practice and are as follows.

6.5.1 Post Implementation Review (PIR)

These reviews ascertain whether the anticipated benefits have been delivered and are timed to take place a year post construction, i.e., January 2026.

6.5.2 Project Evaluation Reviews (PERs)

PERs appraise how well the project was managed and delivered compared with expectations and are timed to take place one-year post construction, i.e., January 2026.

6.6 Contingency Plans

In the event of project failure, the existing schools will continue to operate until such time that the project can be righted.

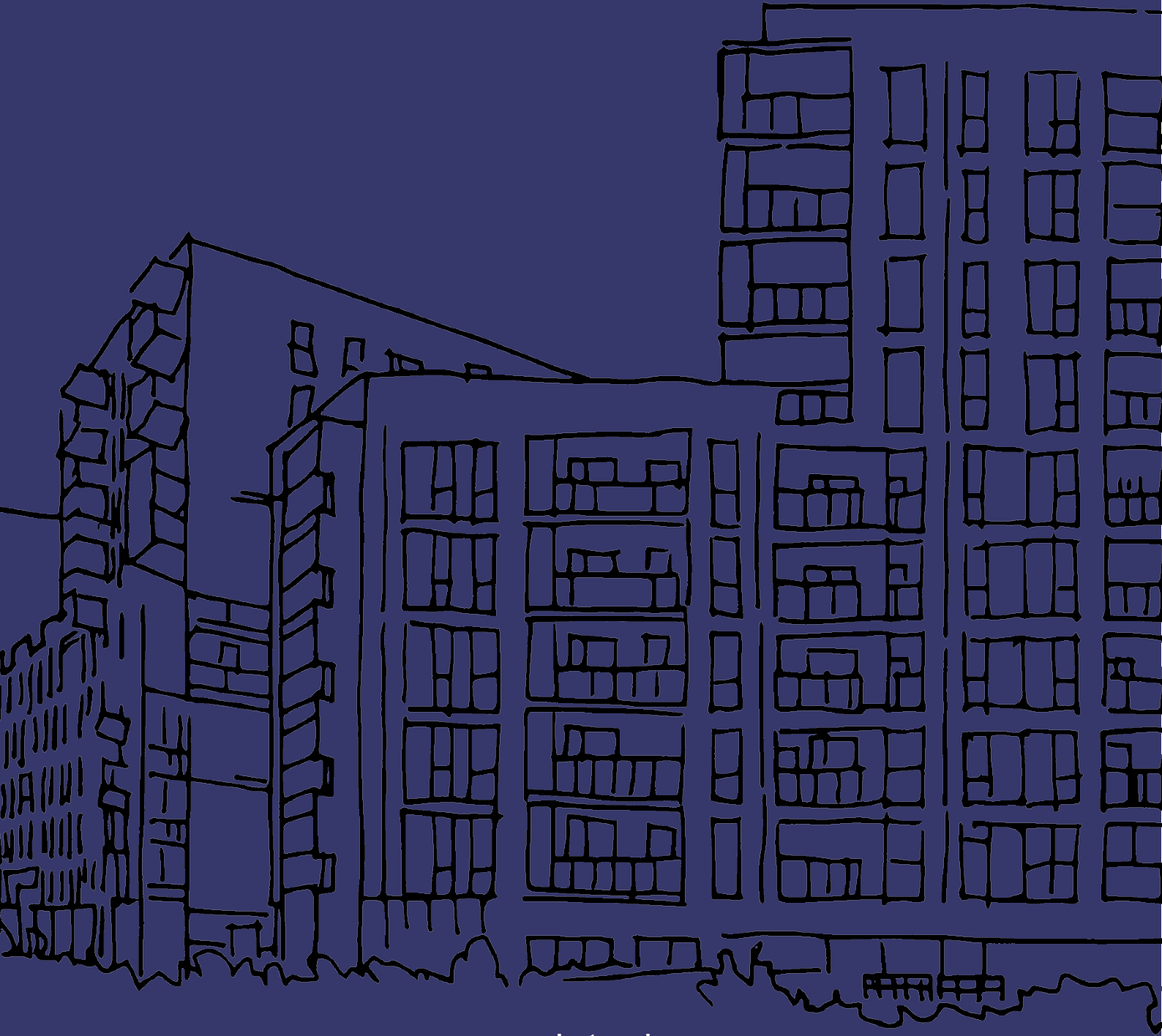
7 Appendix

7.1 Appendix A – Ysgol Bro Hyddgen Impact Assessment



July 22 Bro
Hyddgen Impact Ass

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Impact Assessment (IA)

The integrated approach to support effective decision making



Please read the accompanying guidance before completing the form.

This **Impact Assessment (IA)** toolkit, incorporates a range of legislative requirements that support effective decision making and ensure compliance with all relevant legislation. **Draft versions of the assessment should be watermarked as “Draft” and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

Service Area	Schools Service	Head of Service	Lynette Lovell	Portfolio Holder	Cllr Pete Roberts
Proposal	To build a new all-through school in Machynlleth as part of Powys County Council’s Sustainable Communities for Learning programme, Band B Programme				
Outline Summary / Description of Proposal					
1.1 The aim is to develop a new purpose-built all-through School in Machynlleth, which is situated in the north of Powys. The new scheme will include early years provision (two classrooms), 210 places for primary pupils and 330-place for secondary pupils. It will also incorporate a community room and an additional learning needs centre, along with wellbeing areas throughout the school, external areas and a 3G pitch. The design could also include a space for a public library, if that is required. The current scheme does not include a new leisure facility – this is different to earlier business cases considered in respect of the planned new development at Ysgol Bro Hyddgen.					
1.2 The Council’s Cabinet will consider the revised SOC/OBC on the 11 th of October, and will be asked to approve the following:					
<ul style="list-style-type: none"> - To submit a revised SOC/OBC to Welsh Government’s Sustainable Communities for Learning Programme for investment. 					
This initial impact assessment considers the potential impact of implementation of a new school building with early years and a library facility in Machynlleth. Should the Council proceed with implementation of the preferred way forward as outlined above, the impact assessment will be updated at each stage of the process.					

Page 103

1. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
01	Melany Price	Project Manager – Sustainable Communities for Learning programme,	20/07/2022

2. Profile of savings delivery (if applicable)

2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL
£	£	£	£	£	£

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public consultation required	<p>Formal consultation to establish a new all-through school in Machynlleth already taken place and Ysgol Bro Hyddgen was established in September 2014, and a further consultation exercise on a proposal to change the school’s language category to Welsh-medium took place during 2020-21.</p> <p>Informal consultations around the development, progress and designs with various stakeholders take place on a regular basis.</p> <p>Engagement with relevant bodies and stakeholders will continue throughout the project at necessary stages.</p>

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Impact Assessment (IA)

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4. Impact on Other Service Areas

Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety and Corporate Parenting?) PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY			
Adult Services	<input type="checkbox"/>	Education	X
Children's Services	X	Finance	X
Commissioning	<input type="checkbox"/>	Highways, Transportation and Recycling	X
Digital Services	X	Housing and Community Development	X
		Legal and Democratic Services	X
		Property, Planning and Public Protection	X
		Transformation and Communications	X
		Workforce and OD	<input type="checkbox"/>
Data Protection Impact Assessment			
Will the proposal involve processing the personal details of individuals? Yes <input type="checkbox"/> No X			
Is Powys County Council the data controller? Yes X No <input type="checkbox"/> n/a			
This project at this time does not involve processing personal data, but prior to the old buildings being demolished or declared surplus to requirements, all buildings will need to be emptied and will need to be compliant with GDPR.			
If you have answered yes to either of the above you will be required to complete, as a minimum, the screening questions on the data protection impact assessment. For further advice please contact the Data Compliance Team.			

Page 105

4a Geographical Locations

What geographical area(s) will be impacted by the proposal? (Chose all those applicable)			
Powys	X	Brecon	<input type="checkbox"/>
		Builth and Llanwrtyd	<input type="checkbox"/>
North	X	Crickhowell	<input type="checkbox"/>
Mid	<input type="checkbox"/>	Hay and Talgarth	<input type="checkbox"/>
South	<input type="checkbox"/>	Knighton and Presteigne	<input type="checkbox"/>
		Llandrindod and Rhayader	<input type="checkbox"/>
		Llanfair Caereinion	<input type="checkbox"/>
		Llanfyllin	<input type="checkbox"/>
		Llanidloes	<input type="checkbox"/>
		Machynlleth	X
		Newtown	<input type="checkbox"/>
		Welshpool and Montgomery	<input type="checkbox"/>
		Ystradgynlais	<input type="checkbox"/>

5. How does your proposal impact on Vision 2025?

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Impact Assessment (IA)

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Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
The Economy We will develop a vibrant economy	Implementation of the preferred way forward would result in significant capital investment in the area. School staff and pupils – support the town economy. Local employment during construction. Apprenticeships will be offered during the construction of the project. Improved learning outcomes through improved facilities on one site, which will help support a vibrant economy.	Good		Choose an item.
Health and Care We will lead the way in providing effective, integrated health and care in a rural environment	The new all-through School with a Library facility will be of passivhaus design, constructed and finished in natural and 'healthy' materials. The all-though building is designed to incorporate pupil wellbeing areas, areas for calm and reflection, ensuring that physical and mental wellbeing is put on an equal pedestal. The building has a dedicated specialist unit to support learners with additional learning needs. Despite removing the leisure facility from the new build, the town will continue to have a leisure centre and the Council is committed to maintaining/ upgrading the leisure centre, which will provide health related opportunities in a rural area.	Very Good		Choose an item.

Page 106

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
Learning and skills We will strengthen learning and skills	<p>Children and young people in the Machynlleth and wider area will be able to access state of the art, fit for purpose learning facilities, designed for the 21st Century. Brand new ICT facilities will also be included in the scheme.</p> <p>Implementation of the preferred way forward would replace poor quality buildings in Machynlleth</p> <p>The new building would improve the educational experience provided to learners, ensuring that the school can provide education which fully meets the requirements of the new curriculum.</p> <p>Adult learning will also be encouraged with a community space built into the design.</p>	Very Good		Choose an item.

Page 107

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Page 108

Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>Residents and Communities We will support our residents and communities</p>	<p>The Bro Hyddgen project will have a positive impact on residents in the rural north-west Powys area of Machynlleth. The project will deliver a sustainable model of delivering learning and community facilities for the local population. In combining the all-through school and early years model along with a Library facility.</p> <p>However, the primary phase will be located further away from the housing developments in the town, which would mean that pupils and young people could have further to walk to school. It may be more difficult for parents to attend school activities. Safe walking routes and crossing of roads will be necessary.</p> <p>Early years provision will be located at the new school, which will be further away than the current MCCP provision which is located at the current primary school.</p>	<p>Good</p>	<p>As part of the design process, safe routes to school will be developed and taken into account. Road Safety Audit will be undertaken.</p>	<p>Good</p>

Source of Outline Evidence to support judgements

Engagement with governing body, staff, pupils, town council, Powys CC colleagues in various departments including ALN Team, Library, Corporate Property, IT.

6. How does your proposal impact on the Welsh Government’s well-being goals?

Page 109

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>Community benefits to include opportunities for traineeships / apprenticeships are a key requirement of the Sustainable Communities for Learning Programme, therefore, it is anticipated that these opportunities would be available as part of implementing the preferred way forward.</p> <p>New building will be BREEAM Excellent, Net Carbon in Operation and Passivhaus. SUDS and biodiversity are also considered as part of the design process. PCC also hopes to work on a mini environmental project as part of the overall scheme with the Centre of Alternative Technology.</p>	<p>Very Good</p>		<p>Choose an item.</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Page 110

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>The proposal is to replace the current buildings with a Passivhaus and Net Zero Carbon in operation new building which would be significantly more energy efficient than the current buildings.</p> <p>The design incorporates environmentally friendly outdoor spaces, forest school areas and open spaces conducive to supporting wildlife</p> <p>Implementation of the preferred way forward would also require minimal travel disturbance for some pupils living in Machynlleth given the relocation of the primary facility. This would have a minimal environmental impact as the distance between the existing primary school and the proposed development is not a significant distance</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017: Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>Implementation of the preferred way forward would result in new all through school with early years and a library facility. This would have a positive impact on the well-being and morale of both pupils and staff.</p> <p>By incorporating early years, school, and library facilities in one scheme, the infrastructure will encourage stronger links to develop between each sector.</p> <p>Wellbeing areas are also designed into the new building, ensuring that physical and mental health are treated equally.</p>	<p>Good</p>		<p>Choose an item.</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>The new build will provide a safe environment for the pupils and community usage of the facilities. The library will enable cohesive links between community and school. Incorporating the early years improves continuity between phases and extended care and support for pupils with additional learning needs and in provision for other vulnerable groups. The Welsh language category is implemented, it is hoped that the proposal would help to improve community cohesion, as all pupils in the area would be fluent in both Welsh and English by having a highly efficient building/environment acting as an attractive learning space.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being. Human Rights - is about being proactive (see guidance) UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>The proposal would provide improved, fit for purpose, innovative specialist facilities for the children, young people, and wider community of North West Powys. The scheme will provide the best possible opportunities to all learners in the area, enabling them to reach their full potential.</p> <p>Opportunities for children and young people to have input into the design through consultation with the school as the project progresses to appropriate stages. As part of the consultation process and ongoing meetings/consultation children and young people affected by the proposal will have opportunities to give their views.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. <i>Incorporating requirements under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards</i></p>				

Page 11

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i></p>	<p>The Council has recently carried out the statutory process to change the school's language category, on a phased basis, from dual stream to Welsh-medium, starting in September 2022. Once this proposal has been phased in, all pupils at the school will be fluent in both Welsh and English.</p> <p>As Powys' first designated Welsh-medium secondary provider, Ysgol Bro Hyddgen will become a flagship for the Council, and the new building and associated facilities will provide improved opportunities for pupils attending the school to use the Welsh language, as well as providing enhanced opportunities for using the Welsh language in the community.</p> <p>Delivering an all through new school building would provide an environment and facilities to support, strengthen, and broaden Welsh medium provision by improving the breadth of Welsh medium options at all key stages and ensuring stronger transition and progress for pupils. As a result, pupils would develop into fully bilingual pupils that would be better placed to support the local and national economic and community needs.</p> <p>As well as a full Welsh-medium curriculum, it is likely that establishing a Welsh-medium all-age school would also result in increased opportunities for pupils to access Welsh language activities, including activities provided by the school and activities provided by other organisations e.g. Menter Maldwyn, the Urdd.</p>	<p>Very Good</p>		<p>Choose an item.</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Page 113

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
	Implementing the proposal would raise the profile of Welsh-medium education in the area and create more fluent Welsh speakers who will be able to use the language within the community, therefore contributing to the Welsh Government target to achieve a million Welsh speakers by 2050.			
<i>Opportunities to promote the Welsh language</i>	As above. The campus will become a community hub through the design of the project in a predominantly Welsh speaking area of Powys, the community hub will promote the use of Welsh language within the community. The campus will also have facilities to promote lifelong learning opportunities.	Good		Choose an item.
<i>People are encouraged to do sport, art and recreation.</i>	The proposal would be to increase the appropriate environment and equipment to increase the opportunity to participate in sport, art, and recreational activities by including facilities as part of the school. Facilities will include a new 3G pitch, MUGA, sports hall.	Very Good		Choose an item.
A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances). <i>Incorporating requirements under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Social Economic duty (2020).</i>				
<i>Age</i>	The proposal would provide improved educational opportunities, environments and specialised equipment for all ages attending the school building, from early years, to school pupils, to the wider community. The scheme will also promote inter-generational links, for example, 6 th formers will be able to volunteer in the library to gain Welsh Bac accreditation.	Very Good		Choose an item.
<i>Disability</i>	The new campus will be fully DDA compliant.	Very Good		Choose an item.

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<i>Gender reassignment</i>	Some unisex W/C's will be designed to the building	Good		Choose an item.
<i>Marriage or civil partnership</i>	n/a	Neutral		Choose an item.
<i>Race</i>	The campus will provide equal opportunities and equal access to facilities to all.	Good		Choose an item.
<i>Religion or belief</i>	The campus will provide equal opportunities and equal access to facilities to all.	Good		Choose an item.
<i>Sex</i>	The campus will provide equal opportunities and equal access to facilities to all.	Good		Choose an item.
<i>Sexual Orientation</i>	The campus will provide equal opportunities and equal access to facilities to all.	Good		Choose an item.
<i>Pregnancy and Maternity</i>	No Impact	Neutral		Choose an item.
<i>Socio-economic duty</i>	<p>The aim of the proposal is to provide improved educational opportunities for all pupils in the area including any that are more socio-economically disadvantaged.</p> <p>Primary phase and early years provision is further away from the residential areas of the town, which may have an impact on residents abilities to access the school.</p>	Very Good		Choose an item.

Page 114

Source of Outline Evidence to support judgements

Several cross-service meetings held with Library, Schools Service, Corporate Property, IT. Meetings also held with School representatives, Governing body, Freedom Leisure, Machynlleth Town Council, Machynlleth Library.

7. How does your proposal impact on the council's other key guiding principles?

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Sustainable Development Principle (5 ways of working)				
<p>Long Term: Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</p>	<p>The proposal will provide a more sustainable model of delivering education and community provision in the town of Machynlleth, which will ensure that education can be delivered more efficiently in the long term and is designed to be future proofed in terms of capacity. The campus will also secure a library provision in the long term in the rural town of Machynlleth.</p>	<p>Very Good</p>		<p>Choose an item.</p>
<p>Collaboration: Working with others in a collaborative way to find shared sustainable solutions.</p>	<p>Discussions with the governing body and staff, and headteacher of Ysgol Bro Hyddgen have taken place since building project inception in 2016. Several design meetings facilitated with design team and school representatives. Further meetings held across Powys CC service areas, including ALN Team, Corporate property, Library and IT. Engagement meetings and email correspondence also taken place with Machynlleth Town Council.</p>	<p>Very Good</p>		<p>Choose an item.</p>

Page 115

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>Involvement (including Communication and Engagement): <i>Involving a diversity of the population in the decisions that affect them including:</i></p> <p>Unpaid Carers: <i>Ensuring that unpaid carers views are sought and taken into account</i></p>	<p>Should WG and Cabinet approve the proposed design and costs of the recommended option, a detailed communication plan outlines the milestones for new releases and engagement meetings will ensure the opportunity for all interested parties to give their views. This impact assessment will be updated throughout the process to reflect any feedback received.</p> <p>If funding can be secured, this will be a trigger for further engagements and re-commencement of the Bro Hyddgen all through school with Library facilities.</p> <p>Community Drop-in event will be held to showcase the design and to invite comments from the local community. A further event will be arranged (covid dependant) when the designs are finalised, during pre-planning consultation stage.</p> <p>All stakeholders would have the opportunity to give their views as part of this process, this would include any unpaid carers in the area.</p>	<p>Very Good</p>		<p>Choose an item.</p>

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>Prevention: Understanding the root causes of issues to prevent them from occurring including:</p> <p>Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</p>	<p>The school is designed with pupil safeguarding at its heart.</p> <p>Specialist Centre and ALN support.</p> <p>Wellbeing areas are built into the design.</p>	Good		Choose an item.
<p>Integration: Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</p>	<p>An integrated approach would be taken in order to implement the proposal, which would include other Council service areas and other partners as required.</p>	Very Good		Choose an item.
<p>Powys County Council Workforce: What Impact will this change have on the Workforce?</p>	<p>Powys CC staff will be working from state-of-the-art building, fit for the 21st Century, which is likely to increase morale.</p> <p>There may be an impact on some staff due to colocation on one site</p>	Neutral		Choose an item.
<p>Payroll: How will this impact salary, any overtime/enhanced payments etc? Does this affect any particular group of employees? E.g. Male/Female dominated workforce. Does this proposal comply with the Councils Single Status Terms and Conditions?</p>	<p>The proposal complies with Powys CC's Single Status Terms and Conditions.</p>	Neutral		Choose an item.

Page 117

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Welsh Language impact on staff	Almost all staff at Ysgol Bro Hyddgen are Welsh speaking. The campus will benefit Welsh speaking staff by enabling them to work in a state-of-the-art new building. Conferencing facilities available for community use will be offered as part of the building, increasing access to lifelong learning opportunities, which may be undertaken through the medium of Welsh. Delivering an all through new school building with early years facilities would provide an environment to support, strengthen, and broaden Welsh medium transition and progress for pupils	Very Good		Choose an item.
Apprenticeships: Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?	The project will adopt a Community Benefits Strategy and will set targets in providing apprenticeships, training, and employment opportunities for Machynlleth and Powys population.	Very Good		Choose an item.
Source of Outline Evidence to support judgements				
Several cross-service meetings held with Library, Schools Service, Corporate Property, IT. Meetings also held with School representatives, Governing body, Machynlleth Town Council, Machynlleth Library. Sustainable Communities for Learning Programme Benefits Strategy.				

8. What is the impact of this proposal on our communities?

Communities	How does the proposal impact on residents and community?	IMPACT See impact definitions in guidance document	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION See impact definitions in guidance document	Source of Outline Evidence to support judgement
<i>The project will provide a centralised all-through aged school with Early Years and a Library facility in one building; increasing accessibility to learning, for the population of Machynlleth and wider area.</i>	Positive/ significant long-lasting impact on the residents of all ages. The scheme will provide a state-of-the-art learning environment for the children and young people of Machynlleth. The project will secure local provision for generations to come, and will also provide opportunities for wider community to access library and conferencing facilities.	Moderate		Moderate	<i>Cross service meetings</i>

Page 119

9. What are the risks to service delivery or the council following implementation of this proposal?

Description of risks			
Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
Project fails to achieve net zero carbon and unable to draw down additional funding from Welsh Government.	High/Medium	Coordinated design approach through subsequent design stages with scheme assessment and gateway reviews utilising consultant design teams and specialists.	Medium/Low
Contract sum exceeds the approved budget due to price volatility, inflation, or instability in supply chain market conditions with wider economic factors.	High/Medium	Costs in SOC/OBC have factored in inflationary costs using BCIS indexes to the mid-point of construction. Optimism Bias and Risk also applied.	Medium
Geographic location is not attractive to contractors	Medium	Early engagement with SEWSCAP contractors to ascertain interest	Medium

10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:	
--------------------------------------------------------------	----------------------------------	--

The Bro Hyddgen all-through school with early years and a library facility presents PCC with an opportunity to establish an energy efficient building which supports, strengthens, and broadens Welsh medium provision by improving the breadth of Welsh medium options at all key stages and ensuring stronger transition and progress for pupils. The proposal would provide improved, fit for purpose, innovative specialist facilities for the children, young people, and wider community of North West Powys. The scheme will provide the best possible opportunities to all learners in the area, enabling them to reach their full potential.

The impact assessment consistently scores 'very good' in meeting council priorities, the wellbeing of future generations goals, and meets the council's key guiding principles. The project will promote health and wellbeing by establishing state of the facilities and will put equal emphasis on physical and mental wellbeing. The project is also ground-breaking in supporting Welsh Government's carbon neutral agenda, with the building aiming to achieve both BREEAM Excellent, Passivhaus accreditation and Net Zero Carbon in Operation. The energy considerations of the scheme ensure that PCC is committed to ensuring a sustainable and environmentally conscious model of delivering buildings to support its residents

The biggest risk to this project is the requirement to secure significant investment to deliver from both PCC and Welsh Government via the Sustainable Communities for Learning programme, which is 65% funded by WG and 35% PCC.

Page 120

11. Is there additional evidence to support the Impact Assessment (IA)?

What additional evidence and data has informed the development of your proposal?

Engagement meetings, project board meetings, programme board meetings, inclusion in the Band B SOP approved by Cabinet and Welsh Government. Revised Band B SOP being considered by Powys CC and WG.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

Impact Assessment will be reviewed at each RIBA stage and when the Full Business Case is submitted to WG.
 Project benefits and community benefits will be reviewed on a quarterly basis. Further details on benefits are outlined in OBC and WG project pro-forma documentation.

Please state when this Impact Assessment will be reviewed.

The impact assessment will be reviewed at each RIBA stage of the process.

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Melany Price		
Head of Service:	Lynette Lovell		
Portfolio Holder:	Cllr Pete Roberts		

14. Governance

Decision to be made by

Cabinet

Date required

11th October

FORM ENDS

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CYNGOR SIR POWYS COUNTY COUNCIL

CABINET EXECUTIVE

October 11th, 2022

REPORT AUTHOR: County Councillor Matthew Dorrance
Deputy Leader and Cabinet Member for a Fairer Powys

REPORT TITLE: Adoption of ECO4 Flex in Powys

REPORT FOR: Decision

1. Purpose

- 1.1 ECO4 is the next iteration of the United Kingdom-wide Energy Company Obligation (ECO) programme that originally commenced in January 2013. ECO4 was launched on 27th July 2022 and runs to Autumn 2026. The programme delivers energy efficiency and heating measures to homes.
- 1.2 The ECO4 programme embraces a range of different schemes, including Home Heating Cost Reduction Obligation (HHCRO)¹ and ECO4 Flex. The latter allows a local authority to establish its own eligibility criteria within guidelines set by BEIS. There is no obligation on a Council to establish an ECO4 Flex scheme. However, doing so expands the range of households who can benefit from help to improve energy efficiency and reduce fuel costs.
- 1.3 The availability of the ECO4 Flex scheme in the county offers the opportunity to complement not only HHCRO but also the Welsh Government's Warm Homes initiative. This includes the Arbed am Byth² and Nest³ schemes, together with the Warm Homes Fund⁴. ECO4 Flex, compared to other schemes, includes within its eligibility some non-means tested benefits and health conditions not included in other schemes. This allows action to reduce fuel poverty, raise energy efficiency and increase environmental sustainability to be enjoyed by more households and communities.

¹ The Home Heating Cost Reduction Obligation (HHCRO) scheme, also known as 'Affordable Warmth', provides funding to help eligible people reduce the cost of heating their home through the installation of energy efficient measures. Available across Britain, it is targeted at households with the lowest of incomes.

² Arbed am Byth is the agency been appointed by the Welsh Government to arrange the installation of energy efficiency measures, like central heating or insulation in homes across Wales as part of the Welsh Government Warm Homes scheme.

³ Every household in Wales is eligible for Nest advice and support. Householders who own or privately rent their home, are in receipt of a means-tested benefit or living with specific health conditions and living in the most energy inefficient properties may also be eligible for Nest funded home energy efficiency improvements.

⁴ Warm Homes Fund specifically targets F & G EPC rated homes within the private rented sector, in collaboration with Rent Smart Wales.

- 1.4 The proposal is that in Powys ECO4 Flex would be delivered by Warm Wales, a not-for-profit Community Interest Company specialising in tackling fuel poverty. <https://www.warmwales.org.uk/about-warm-wales/>
- 1.5 This report recommends adoption of ECO4 Flex, informed by the latest guidance from the Department of Business, Energy and Industrial Strategy (BEIS) and OFGEM.

2. Background

- 2.1 ECO4 Flex is considered a key driver in assisting local authorities in their aim of reducing fuel poverty, whilst simultaneously contributing towards reducing carbon emissions from domestic homes, owned or occupied by those unable to pay for improvements themselves.
- 2.2 BEIS guidance allows a council to take part in ECO4 Flex following publication of an appropriate Statement of Intent (SOI). The SOI sets eligibility criteria for the fuel poor and vulnerable applicants, as well as details of how the scheme will operate and be governed.
- 2.3 Under previous schemes each council needed to develop its own eligibility criteria. However, for ECO4 Flex, BEIS has developed a standardised SOI and client eligibility criteria to identify homes most at risk of fuel poverty.
- 2.4 The standardised SOI includes additional flexibility and encourages local authorities to collaborate with fuel poverty specialists, such as Warm Wales. This facilitates pooling of resources and expertise to better address fuel poverty initiatives through locally approved schemes.
- 2.5 Adopting the standardised eligibility criteria will mean Powys is less likely to be disadvantaged when compared to other authorities in accessing funding delivered by external ECO funders and their delivery partners.

3. Advice

- 3.1 Following consultation by BEIS and OFGEM, new guidance has been issued proposing adoption of a nationally agreed, standardised SOI for local authorities. The intention is to increase uptake of ECO4 Flex installations throughout the UK by those in fuel poverty.
- 3.2 The Powys ECO Flex Report Recommendations are attached to this report as Appendix A. This includes details of 'The Warm Wales - Powys Energy Savings Scheme' together with current and proposed scheme conditions (should Powys adopt ECO4 Flex).

- 3.3 Advice from our proposed delivery partner, Warm Wales, recommends Powys adopt the standardised BEIS SOI, with a particular focus on utilising the Route 2 qualification criteria. This would afford Warm Wales an opportunity to identify and help households in Fuel Poverty via 'The Warm Wales - Powys Energy Savings Scheme.' This specifically targets those in fuel poverty who would not necessarily qualify for assistance via ECO.
- 3.4 The proposed Powys ECO4 Flex SOI for consideration and adoption by Cabinet is attached to this report as Appendix B.

3.5 Options Appraisal

3.5.1 Option One: Discontinue the scheme.

- In Powys, ECO3 Flex ended on 30th June 2022 and continuation of ECO4 Flex is subject to adoption of a new SOI. Failure to adopt will mean discontinuation of this investment into energy efficiency improvement of homes, following the Council's declaration of a climate emergency and at a time of fuel price increases. This would disproportionately have a detrimental impact on low-income and vulnerable households.
- Failure to adopt the SOI will remove the ability for Powys to access both the Welsh Government Arbed am Byth and the Warm Homes Schemes, restricting future strategic investment in energy efficiency projects.

3.5.2 Option Two: Adopt the proposed BEIS 'standardised' SOI.

- Adoption of the standardised SOI published by BEIS would facilitate uptake of ECO4 Flex in Powys, reduce carbon emissions from domestic homes and deliver reduced energy bills for many as a direct result of living in more energy efficient homes.
- It would allow Powys access to both Welsh Government Arbed am Byth and Warm Homes Schemes, enhancing future strategic investment in nationally targeted energy efficiency projects.

4. Resource Implications

- 4.1 There are no additional resource implications for the authority, ECO4 Flex is fully funded by the participating energy companies. Warm Wales would continue to deliver the scheme at zero cost to the Council under a renewed service level agreement for the duration of ECO4.
- 4.2 The Head of Finance (Section 151 Officer) notes the report.

5. Legal implications

5.1 Legal implications have been reviewed by the Housing Solicitor who is happy with the content and recommendation associated with the report.

5.2 The Head of Legal Services and Monitoring Officer has commented as follows: "I note the legal comment and have nothing to add to the report".

6. Data Protection

6.1 The declaration of a revised 'Statement of Intent' for the continued delivery of ECO4 Flex in Powys involves the processing of personal data. Delivery would be contracted out to the Community Interest Company, Warm Wales, who would be the data controller. Accordingly, Warm Wales would be required to deliver the scheme and comply with the General Data Protection Regulations 2018, under service level agreement with the Council.

6.2 Any personal data being processed by Powys County Council as the data controller, in relation to the declaration, will be managed in line with data protection legislation.

7. Comment from local member(s)

7.1 ECO4 Flex is a county wide initiative affecting all local Members.

8. Integrated Impact Assessment

8.1 An impact assessment was undertaken prior to adoption of the previous ECO3 Flex proposal. Amendment of the SOI and adoption of ECO4 Flex will ensure delivery of the scheme in accordance with the original Impact Assessment.

9. Recommendation

9.1 Cabinet is recommended to:

9.1.1 Support Option Two and adopt the revised Statement of Intent, attached to this report as Appendix B, for the delivery of ECO4 Flex in Powys by Warm Wales.

Contact Officer: Julian Preece
Tel: 07795 602642
Email: julian.preece@powys.gov.uk

Head of Service: Andy Thompson

Corporate Director: Nina Davies

Appendix A:

Powys ECO Flex - Review and Recommendations

Warm Wales have historically worked in partnership with Powys County Council (PCC) to manage delivery of ECO3 within the county. More recently, Warm Wales has developed a bespoke proposal, specific to Powys residents, in relation to the evolution of ECO4 Flex. It is hoped adoption in Powys will help compensate the current cost of living crisis, reduce the incidence of fuel poverty whilst simultaneously reducing carbon emissions from 'hard to treat' properties within the domestic housing stock.

The delivery of the ECO scheme is considered a key driver to assist Local Authorities to reduce fuel poverty and reduce carbon emissions from housing stock owned or occupied by those unable to pay for improvements themselves.

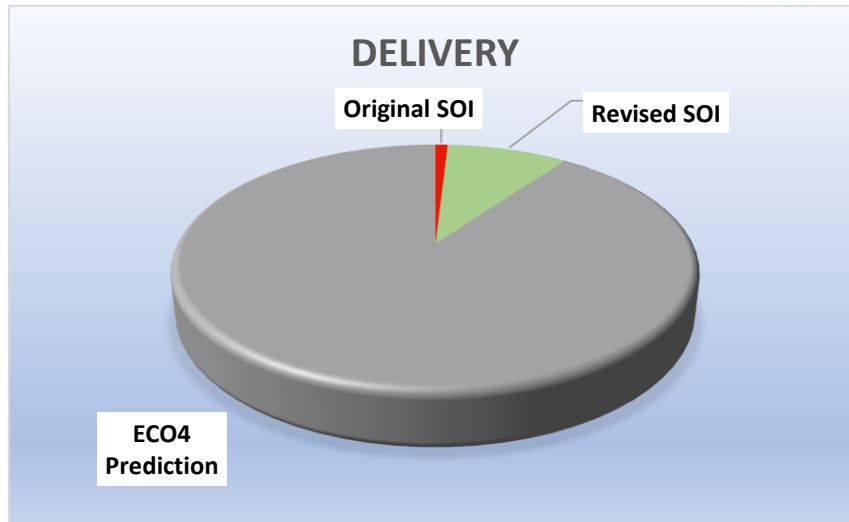
Following guidance from the Department for Business, Energy and Industrial Strategy (BEIS), PCC can offer ECO4 Flex via a published Statement of Intent (SOI). The SOI sets criteria to direct assistance towards any home at risk of fuel poverty, but falling outside of the normal qualifying ECO rules (usually only for those on benefits). PCC then issue a declaration letter on behalf of residents stating that they are eligible for funding.

Following the launch of ECO3, several mitigating factors affected enrolment (Covid & funding restrictions). Warm Wales subsequently recommended a review of the SOI. This change of parameters, agreed through PCC Cabinet, increased eligible applications. However, throughout ECO3, applications were lower than anticipated and changes are necessary to make scheme delivery viable for Warm Wales.

Current Situation

Warm Wales initially identified that the low number of eligible applications was in part due to the tight income eligibility thresholds selected for the SOI (based on original BEIS guidance). This was revised, following introduction of increased income thresholds by BEIS, generating an upswing in eligible applications, assessments, and ensuing assistance.

To date, the scheme has seen a total of 44 ECO flex declaration letters issued by PCC.



Period	Declaration letters
Original SOI	4
Revised SOI	40
ECO4 Prediction (18 months from commencement)	400

Recommendation

ECO4 launched on the 27th July 2022, under The Electricity and Gas (Energy Company Obligation) Order 2022 and BEIS has issued a standard SOI for adoption by Local Authorities across England and Wales.

Under previous ECO schemes, each council needed to develop its own eligibility criteria. However, for ECO4 Flex, BEIS has developed a standardised SOI and client eligibility criteria to identify homes most at risk of fuel poverty. There is now also the added allowance and greater flexibility of being able to work closely with local approved organisations such as Warm Wales, utilising their expertise in tackling fuel poverty via an approved scheme.

Following consultation by BEIS and OFGEM, Warm Wales propose Powys adopts this new guidance, including the nationally agreed and standardised SOI for local authorities throughout the UK.

However, prior to implementing ECO4, Warm Wales recommends an appraisal of the SOI to tailor it to local needs, enabling more struggling Powys residents to take advantage of the available funding for energy efficiency improvements.

It is proposed that Powys adopts the standardised SOI and utilises Route 2 of the qualification criteria, affording Warm Wales the opportunity to identify and help households in fuel poverty via 'The Warm Wales - Powys Energy Savings Scheme,' an established successful pilot in operation during the interim between ECO3 and ECO4. The scheme would ideally like to address households in fuel poverty who would not necessarily benefit under normal ECO qualifying criteria. The enhanced scheme criteria adopted based on that previously approved by Powys Cabinet under ECO3 Flex.

This scheme and its criteria are being designed based on experience and take up levels from previous ECO campaigns administered by Warm Wales. The new scheme focus is centered around a 'whole house' approach for ECO4 funding with an emphasis on helping households in fuel poverty.

The purpose of ECO Flex is to have a more flexible, less rigid approach on a regional basis, helping more people that would otherwise fail to benefit (falling just outside) normal ECO qualifying criteria.

This is primarily due to a high proportion of Powys being a rural 'off gas' area consisting of older housing stock with solid wall, uninsulated/limited property insulation and a population with an older average household age. Consequently, residents in Powys have a significantly higher than the national average net fuel spend versus income. They find themselves in a position where they can't afford to make the necessary fabric and heating improvements. This is due to the excessive outlay cost and difficulty/disruption of upgrading such hard-to-treat homes compared to newer properties.

The current cost of living crises caused by catastrophic fuel, interest and energy price hikes is having a serious impact on many families, exasperating the difficult housing and social conditions identified above. Therefore, under our new proposed scheme criteria we have adopted a **net** income level (after mortgage/rent, council tax and main fuel bill payments) to help address the above issues.

On the 22nd July 2022, The Warm Wales - Powys Energy Savings Scheme was launched, based on an ongoing initial pilot project. Eligibility for the scheme mirrors that of ECO4 qualifying criteria. It is our mission to try and improve peoples' lives by offering them an opportunity to make the necessary fabric and heating improvements to the whole house.

Our aim is to focus on greener more carbon neutral solutions to dramatically lower energy costs, whilst making Powys greener and more Eco friendly.

Should ECO4 Flex be adopted in Powys, we propose a 2-part scheme qualification process to enhance The Warm Wales - Powys Energy Savings Scheme. (Detailed in Appendix A).

The recommended changes will increase the uptake of ECO4 locally, subsequently reducing fuel poverty and carbon emissions within Powys. This will also permit PCC to follow national ECO processes while allowing local nuances to be addressed.

In doing so, more households will benefit from the scheme resulting in the following outcomes for PCC:

- Tackle fuel poverty by increasing low-income homes' energy efficiency rating substantially, adopting a 'whole house' approach and solution to reduce energy bills.
- Deliver cost effective carbon savings to carbon budgets and progress towards the UK's target for net zero by 2050.
- Support clean growth and ensure homes are thermally comfortable, efficient and well adapted to climate change.
- Support economic resilience and a green recovery in response to the economic impacts of Covid-19 within PCC.
- Use learning from the delivery experience to inform the development and design of further energy efficiency schemes.

Appendix A:

The Warm Wales Powys Energy Savings Scheme



WARM WALES
CYMRU GYNNES

Tackling Fuel Poverty Together!

Warm Wales are proud to launch an innovative new scheme designed to address fuel poverty and reduce carbon emissions by adopting a 'whole house' approach and solution. Funding for the following improvement measures is available under the scheme via ECO4 and subject to the qualifying criteria and conditions listed below.

- Air/Ground Source Heat Pump central (radiator) heating/underfloor heating system
- Solar PV & (Battery Storage - Subject to Powys County Council funding)
- Mains Gas Boiler (*existing boiler must be non-condensing*)
- SMART Heating (Zone) Controls
- Energy Saving Lights
- Loft Insulation
- Room in Roof Insulation
- Solid Wall Insulation
- Cavity Wall Insulation
- Underfloor Insulation
- Flat-roof Insulation
- Draught Proofing

Qualification is based on the current and potential EPC rating achievable being enough to provide sufficient funding levels to carry out works. **ALL** essential improvement measure recommendations provided in your assessment **must** be taken up. **No part projects are allowed.**

In the event there is insufficient funding available, you may be offered the opportunity to provide a contribution towards your improvement works (part-funded). An interest free loan may be available (subject to acceptance) from the Robert Owen Community Banking Fund to help with the initial outlay.

Current Scheme Qualifying Criteria

- 1)** Income based Jobseekers Allowance (JSA)
- 2)** Income related Employment and Support Allowance (ESA)
- 3)** Income Support (IS)
- 4)** Pension Credit Guarantee Credit (PCGC)
- 5)** Working Tax Credit (WTC)
- 6)** Child Tax Credit (CTC)
- 7)** Universal Credit (UC)
- 8)** Housing Benefit (HB)
- 9)** Pension Credit Savings Credit (PCSC)
- *10)** Child Benefit

***Child Benefit Income Threshold - ECO4 Qualification**

<u>Number of Children</u>	<u>Single Claimant</u>	<u>Member of a Couple</u>
1	£19,900	£27,500
2	£24,800	£32,300
3	£29,600	£37,200
4 +	£34,500	£42,000

PROPOSED Enhanced Scheme Qualifying Criteria (Post ECO4 Flex Adoption by Cabinet)

It is recommended the following be added to Scheme Criteria post adoption by Cabinet.

Part 1 Qualifying Criteria

The property must have a current EPC rating of **E, F or G**. *(All EPC scores will be taken at face value from www.epcregister.com).*

Hard to Treat Home, Vulnerability or Fuel Poverty.

To qualify under Part 1, it is necessary for any householder to be classed as vulnerable due to their house type/condition, financial instability, or at greater risk of further ill health, due to the effects of living in a cold home.

To do this they must pass any **one** of the **a,b or c** conditions listed below from ECO Flex Route 2, Proxy 3. Conditions based on and identified using the National Institute for Health & Care Excellence (NICE) guidance and recommendations;

<https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations>

a) Hard to Treat Properties

Properties with the following conditions below;

- Off Gas area
- Solid Wall (Internal/External Wall Insulation required)
- No loft space (Room in the roof insulation required)

Evidence Required: Current EPC

- State of disrepair

Evidence Required: Picture of interior and exterior of property

b) Vulnerability

Householders vulnerable or higher risk due to a medical condition as outlined below (but not limited to); or have contacted or been referred to Warm Wales due to a medical condition making them more vulnerable to a 'cold home'.

- people with cardiovascular conditions
- people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma)
- people with mental health conditions
- people with disabilities

Evidence Required: Doctors letter confirming condition

- older people (60 and older)

Evidence Required: Drivers Licence or Passport

- households with children (in full time education)

Evidence Required: Child Benefit letter or bank statement (*confirming benefit payment*)

- pregnant women

Evidence Required: Midwives letter confirmation of pregnancy or picture of Personal Child Health Record Book.

c) Fuel Poverty

To qualify via the Fuel Poverty route, a householder needs to show financial vulnerability as outlined below (but not limited to); or have contacted or been referred to Warm Wales due to their dire financial situation making them more vulnerable to a 'cold home'.

- An increasing fuel debt with no means to reduce it

Evidence required: Two concurrent fuel bills showing an increasing fuel debt, plus copy of bank statement confirming their inability to repay the fuel debt

- On a pre-payment meter where self-disconnection occurs regularly

Evidence required: Picture of pre-payment meter **and** top-up card

- Spend more than 10% net income on domestic energy to keep their home warm

Evidence required: Copy of latest fuel bills and bank statement confirming monthly income & fuel spend

Part 2 - Qualifying Criteria - Low Income

In addition to Part 1, to Qualify under Part 2 - you must have a **net** (after payment of mortgage/rent, council tax & main heating energy bill) **household income** falling below that of the values in the table below, corresponding to family makeup and size.

***WARM WALES WILL REQUIRE APPROPRIATE EVIDENCE TO DEMONSTRATE INCOME & EXPENDITURE LEVELS FROM ALL APPLICANTS**

**Warm Wales reserve the right to apply discretion for exceptional cases of hardship (on a case-by-case basis) that fall outside the income levels below:*

Table 1

<u>STATUS</u>	<u># NET INCOME</u>
1 Adult	£18,400
1 Adult + 1 Child	£19,900
1 Adult + 2 Children	£24,800
1 Adult + 3 Children	£29,600
1 Adult + 4 Children+	£34,500
2 Adults	£26,000
2 Adults + 1 Child	£27,500
2 Adults + 2 Children	£32,300
2 Adults + 3 Children	£37,200
2 Adults + 4 Children+	£42,000

#Income levels will increase annually from 1st Jan 2023, in line with RPI or CPI

Evidence required:

- Latest bank statement (showing salary, mortgage/rent, council tax & energy bill payment)

NB: For self-employed we will need latest SA302 tax calculation confirming Net Profit.

- Utility bill (fuel used for main heating source)
- Council Tax bill

A completed and signed ECO FLEX declaration form by the applicant is necessary together with any documentary evidence requested by Warm Wales as above.

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Appendix B:



ECO4 Flexible Eligibility Statement of Intent

Local Authority: Powys County Council

Publication Date: 11/10/2022

Version number: V.1

Publication on web site: www.powys.gov.uk

This statement sets out **Powys** Council's flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 - March 2026.

The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes helping to meet the Government's fuel poverty and net zero commitments.

The flexible approach for Local Authorities (LAs) to identifying fuel poor and vulnerable households who may benefit from heating and energy saving measures is referred to as "ECO4 Flex".

The Council welcomes the introduction of the ECO4 Flex eligibility routes as it helps the Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold. The Council is publishing this Statement of Intent (SOI), on the **11/10/2022** to confirm that each of the households declared will adhere to at least one of the four available routes outlined below:

Route 1: SAP bands D-G households with an income less than £31,000. This cap applies irrespective of the property size, composition, or region.

Route 2: SAP bands E-G households that meet a combination of two of the following proxies:

Proxy 1) Homes in England in Lower-layer Super Output Area 1-3 (LSOA)¹, or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019², or the Index of Multiple Deprivation for 2020, published by the Scottish Government.³

Proxy 2) Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).

Proxy 3) Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income'.

Proxy 4) A householder receiving free school meals due to low-income.

Proxy 5) A householder supported by a LA run scheme, that has been named and described by the LA as supporting low income and vulnerable households for the purposes of NICE Guidelines.

Proxy 6) A household referred to the LA for support by their energy supplier or Citizen's Advice or Citizen's Advice Scotland, because they have been identified as struggling to pay their electricity and gas bills.

Proxy 7) Households identified through supplier debt data. This route enables obligated suppliers to use their own debt data to identify either Non-Pre-Payment meter households (non-PPM), or Pre-Payment meter households (PPM).

<https://www.ofgem.gov.uk/publications/eco4-guidance-local-authority-administration>

¹ [The English Indices of Deprivation 2019 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² [Welsh Index of Multiple Deprivation \(full Index update with ranks\): 2019 | GOV.WALES](#)

³ [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](http://www.gov.scot)

* Note proxies 1 and 5 cannot be used together

Providing applicants meet criteria of '**The Warm Wales - Powys Energy Savings Scheme**' they subsequently qualify for ECO4 Flex utilising proxies 3 & 5 above.

Route 3: SAP bands D-G households that have been identified by their doctor or GP as low-income and vulnerable, with an occupant whose health conditions may be impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related. This is because the Council has identified a positive correlation between households who suffer from long-term health conditions and living off a low-income, with living in poorly insulated homes.

Route 4: SAP band D-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to BEIS where they have identified a low income and vulnerable household, who are not already eligible under the exiting routes.

Declaration and Evidence Check Confirmation

All potentially eligible households should apply directly to one of the approved ECO installers listed on the Warm Wales website to ensure that they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

Liabilities - Powys County Council accept no responsibility or liability resulting from any negative consequence, damage or loss arising from the acceptance of an ECO FLEX grant. This includes efforts connected with the preparation, application, or survey prior to an installation or as a result of works delivered under the scheme. Powys County Council do not endorse any specific energy supplier, grant agent, installer or company connected to the application or installation of ECO flex grants or products. Any grievance or issue raised against grant works or application process, should be taken up with the installing party/agent/financier. Powys County Council's involvement in the scheme is limited to the declaration of eligibility for grant. Should you wish to have the declaration explained in further detail, please email - privatesectorhousing@powys.gov.uk

Final decision - The decision on whether a household receives a measure under flexible eligibility or other ECO funding streams will be made by the energy supplier or their agent/contractor. Qualification in the statement of intent or issuance of a declaration by Powys County Council will NOT guarantee installation of a measure, the final decision rests with the supplier.

Cost Associated with Measures

Whilst some measures being grant funded will be free to the consumer at point of sale, others may only be partially grant funded and will require a contribution from the consumer

or agent to be delivered.

Any financial or contractual arrangement relating to the installation of a specific measure, home survey or service shall be at the discretion of the homeowner or occupier to accept or decline as they choose. Powys County Council will not be party to any such arrangements; this shall solely be between the client and any third party of their choice.

Governance

The body to which any application for assessment prior to qualification under this Statement of Intent will need to be made shall be delegated to the Community Interest Company - Warm Wales. Powys Council no longer accepts applications direct.

If you wish to make an application for confirmation of grant eligibility, please contact directly one of the approved ECO installers listed on the Warm Wales website:

www.warmwales.org.uk

Warm Wales shall engage in scheme promotion and conduct vetting of applications via collection of evidential client information. Warm Wales will be solely responsible for referring successful applications to Powys Council for sign off. **Powys County Council** shall issue declaration certificates to eligible applicants.

Any 3rd party agent of a contractor with clients they wish to refer to the council will need to have said clients utilise the vetting services of Warm Wales and have those clients referred to the council via that organisation. The council will not be party to any such arrangement implemented between Warm Wales and any 3rd party agent of each independent contractor. Warm Wales shall select the installer and/or funder for all clients for whom they facilitate the application process for funding under ECO4.

The officer below will be responsible for checking and verifying declarations and associated evidence submitted on behalf of the local authority: -

Name: Julian Preece

Job Title: Housing Policy, Performance & Standards Manager

Telephone: 07795 602642

Email: julian.preece@powys.gov.uk

Officers holding the following positions shall be empowered to sign declarations on behalf of Powys County Council - Housing Policy, Performance & Standards Manager, Housing & Communities Sustainability Officer, Housing Environmental Health Officer, Housing Service Improvement Officer.

Monitoring

Information regarding the number of referrals made to the council by Warm Wales and declarations issued, shall be recorded by the council. Any further information would be held by the agent or contractor and submitted to BEIS/OFGEM separately.

General Data Protection Regulations & Privacy Notice

In order to access ECO4 funding, personal data will need to be shared with 3rd parties by agents through which any application is made. Powys Council are not able to process or handle applications without involvement of said 3rd parties. The 3rd parties not the Council, are responsible for sourcing ECO4 funding and arranging installation of measures. For this reason, Powys County Council does not consider itself to be the Data Controller in this scenario because it is not the body responsible for offering or delivering the grant. Powys County Council will process all data submitted as part of the scheme in accordance with data protection legislation. Please refer to Powys County Council's Housing Privacy Notice: <https://en.powys.gov.uk/article/7132/Housing-Privacy-Notice>.

CEO or Dedicated Responsible Person Mandatory Signature

Powys County Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council will oversee the process of identifying eligible households under ECO4 Flex. The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.

Name: Cllr. Mathew Dorrance

Job Title: Deputy Leader and Cabinet Member for a Fairer Powys

Date of signature: 11/10/2022

For general enquires relating to this SOI, please contact: louise.page@powys.gov.uk

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CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

October 11th, 2022

REPORT AUTHOR: Councillor Matthew Dorrance - Deputy Leader and Cabinet Member for a Fairer Powys

REPORT TITLE: Renting Homes (Wales) Act 2016 – Tenancy Terms for New Tenants

REPORT FOR: Decision

1. Purpose

- 1.1 A Housing Services Working Group has been established to oversee the implementation of the Renting Homes (Wales) Act 2016 in Powys. This work has included consideration of the use of Introductory Tenancies¹, which under the provisions of the Act will be replaced by an Introductory Standard Contract². The Renting Homes (Wales) Act 2016 comes into force in December 2022.
- 1.2 A review by the Working Group regarding the use and effectiveness of Introductory Tenancies in Powys shows that there is no practical or operational reason to implement the use of Introductory Standard Contracts from December 2022. Accordingly, there is no need to continue beyond the date of this report, if approved, with the continued use of Introductory Tenancies for new tenants.

2. Background

- 2.1 Under the Renting Homes (Wales) Act 2016 the default contract to be issued by community landlords, which includes local authorities, is the Secure Contract. A Secure Contract offers tenants the highest level of tenure security, equivalent to that enjoyed under the current Secure Tenancy. The Act also allows community landlords to issue an Introductory Standard Contract. Subject to the tenant complying with the terms of such a contract, after twelve months an Introductory Standard Contract would, unless the landlord requests through the courts an extension of the introductory contract, become a Secure

¹ For tenants in council housing, an Introductory Tenancy is a probationary tenancy for twelve months. After the trial period, an introductory tenant will become a secure tenant if they have met and not breached the conditions set out in their tenancy agreement. The equivalent for housing associations is a Starter Tenancy.

² Introductory Standard Contracts allow community landlords, such as a local authority or housing association, to ascertain during the introductory period whether a contract-holder can sustain a Secure Contract.

Contract. The Council cannot be selective with whom to issue an Introductory Standard Contract; it must be issued to all new tenants or to none at all.

- 2.2 The decision to make use of Introductory Tenancies was made by Cabinet on November 11th, 2014 and applied to all new Council tenants from April 2015. The objective was to allow the Council to be better able to obtain possession against a tenant who had breached their tenancy conditions, for example by engaging in anti-social behaviour.
- 2.3 Housing Services has reviewed effectiveness of the use of Introductory tenancies by the Council between April 2015 and August 17th, 2022:
- A total of 1614 introductory tenancies, out of 1904 issued, have been converted to secure tenancies,
 - Three introductory tenancies were extended from twelve to eighteen months (as provided for in law) and subsequently surrendered by the tenant, during the extension,
 - Nine introductory tenancies were extended from twelve to eighteen months, and then converted to secure,
 - Eight introductory tenancies are, as of August 17th, 2022, still within their extended period,
 - A total of 280 introductory tenancies ended before being converted to secure. This included eleven evictions for rent arrears. This equates to 0.6% of all Introductory Tenancies issued. The remaining 268 introductory tenancies were ended by the tenant.
- 2.4 The Housing Service has consulted with the eight housing associations that are members of 'Homes in Powys' to clarify their intentions in respect of Introductory Standard Contracts. Seven have confirmed that they have already stopped issuing Starter Tenancies, the housing association equivalent of an Introductory Tenancy, or will be doing so by not adopting Introductory Standard Contracts once the Act is implemented. The eighth is currently considering such a change in its approach to new tenants.

3. Advice

- 3.1 The use of Introductory Tenancies, and the successor Introductory Standard Contracts, presumes that all tenants are at risk of breaching their tenancy conditions during the first twelve to eighteen months of their tenancy. There is little evidence to suggest, based on the experiences of the Council since 2015, that this is the case in Powys. This suggests that there is no need for the Council to continue to issue the Introductory Tenancy or its successor, the Introductory Standard Contract.
- 3.2 Should the Cabinet approve the recommendation to end the use of Introductory Tenancies, all current Introductory tenancies will automatically convert to secure tenancies. Housing Services will write

to affected tenants to advise them of this change. No further Introductory tenancies will be issued.

- 3.3 Should the Cabinet approve the recommendation not to adopt the Introductory Standard Contract from December 2022, then a consistent approach to new tenants will be achieved across all social landlords working in Powys.

4. Resource Implications

- 4.1 There will be no additional resource implications associated with the proposal. The intention is to remove the step of issuing an introductory tenancy and issue all new tenants with a secure tenancy.
- 4.2 The Head of Finance (Section 151 Officer) notes the content of the report.

5. Legal implications

- 5.1 Legal implications have been reviewed by the Housing Solicitor who is happy with the content and recommendation associated with the report. The removal of introductory tenancies would assist in the implementation of the Renting Homes (Wales) Act 2016 by removing the need for an additional occupation contract to be drawn up and also would provide more security for tenants.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: "I note the legal comment and have nothing to add to the report".

6. Comment from local member(s)

- 6.1 This report and its recommendations apply across all wards in Powys.

7. Integrated Impact Assessment

- 7.1 An Integrated Impact Assessment is not required as the recommendation to issue all new tenants from the date of this report being approved with a Secure Tenancy and all new tenants from December 2022 a Secure Contract, both actions increasing the security of tenure enjoyed by the Council's tenants.

8. Recommendation

- 8.1 It is recommended that:
 - 8.1.1 With effect from the date of this report, that the Council no longer issues Introductory Tenancies for new tenants of the Council.

8.1.2 The Council does not offer Introductory Standard Contracts for new tenants, after the Renting Homes (Wales) Act 2016 comes into force.

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Head of Service: Andy Thompson

Corporate Director: Nina Davies

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE
11/10/2022

REPORT AUTHOR: County Councillor Jake Berriman
Portfolio Holder for a Connected Powys

REPORT TITLE: Asset Management Strategy

REPORT FOR: Decision

1. Purpose

- 1.1 The Asset Management strategy sets out a framework within which all the councils land and property assets (excluding assets managed by the Housing Service) will be appraised, managed, and released to ensure that they continue to contribute to and deliver the Councils objectives. Approval is sought from Cabinet to adopt the Asset Management Strategy (Appendix A) with immediate effect.

2. Background

- 2.1 Powys County Council owns, rents and leases a significant portfolio of land and buildings, from offices and schools to leisure centres, libraries, workshops and farms.
- 2.2 The efficient and effective acquisition, management, use and release of property assets is fundamental to sound financial management and the delivery of exemplary public services.
- 2.3 The Asset Management Strategy set out the actions that will be implemented to help the council achieve its vision for a well-managed property portfolio.

3. Advice

- 3.1 Cabinet are asked to adopt the Asset Management Strategy as found at appendix A, with immediate effect.

4. Resource Implications

4.1 It is considered that the Asset Management Strategy can be delivered within the existing resource envelope. This will however need to be closely monitored moving forward to ensure that deadlines are achieved.

4.2 The Head of Finance (Section 151 Officer) comments that the strategy and the output it will generate will inform the Councils Capital and Medium Term Financial Strategies, enabling the Council to consider and prioritise its Capital plans and the financial strategy to support them. An overall corporate approach in the management of assets ensures that resources are targeted and prioritised to deliver our corporate objectives and ensure that the capital expenditure plans of the council are affordable, prudent and sustainable.

5. Legal implications

5.1 Legal: the recommendations can be accepted from a legal point of view

5.2 The Head of Legal Services and Monitoring Officer has commented as follows: " I note the legal comment and have nothing to add to the report".

6. Data Protection

6.1 Not applicable

7. Comment from local member(s)

7.1 Not applicable.

8. Impact Assessment

8.1 The impact assessment is attached as appendix B. The strategy is considered to have a neutral or positive impact. No negative impacts have been identified.

9. Recommendation

9.1 It is recommended that the Asset Management Strategy (Appendix A) is adopted by Cabinet with immediate effect.

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Head of Service: Gwilym Davies

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POWYS COUNTY COUNCIL - ASSET MANAGEMENT STRATEGY 2022



CONTENTS

1. Foreword
2. Introduction
3. Our Vision
4. Acting sustainably with social responsibility
5. Our Assets
6. Action Plan
7. Resources

1. FOREWORD



Powys County Council owns, rents, and leases a significant portfolio of land and buildings, from offices and schools to leisure centres, libraries, workshops, and farms. It is vital that the management and use of Powys' property assets aligns with the strategic objectives and aspirations of the Council in discussion with its public sector and community partners.

This Asset Management Strategy is my opportunity to ensure that our assets are utilised in a sustainable way to meet the existing and projected needs of the Council without impacting on future generations, and where possible, supporting the social, economic, and environmental wellbeing of the communities it represents, helping them to tackle the complex issues and challenges we all face.

Very simply, this document sets out the Council's Vision and key actions necessary to ensure that the management of the Council's assets is undertaken in a robust, timely, cost-effective, considered, and sustainable way.

We are facing very challenging times, a cost-of-living crisis, a housing crisis and climate and ecological emergencies, all of which put a squeeze on our limited resources and frustrate our ability to deliver the services necessary to help the people and communities of Powys cope and to adapt over time. We recognise the importance of maximising income from our property assets and will seek opportunities to generate capital receipts and increase revenue generation aligned to our medium-term financial strategy. We will do so responsibly, having weighed the options and implications for others, wishing, where possible to strengthen community resilience and evidence a social return on investment.

I will continue to work closely with communities, partner organisations, elected Councillors, and officers to ensure we maximise the benefit derived from the use of Powys' property assets and deliver our Corporate Plan objectives, revisiting and reviewing the Strategy in three years' time.

Councillor Jake Berriman
Cabinet Member for a Connected Powys

2. INTRODUCTION

- 2.1 This strategy sets out the framework within which all the Council's land and property assets (excluding assets managed by the Housing Service) will be appraised, managed, and released to ensure that they continue to contribute to and deliver the Council's corporate objectives. It will be supported by a new, combined, Asset Management Policy.

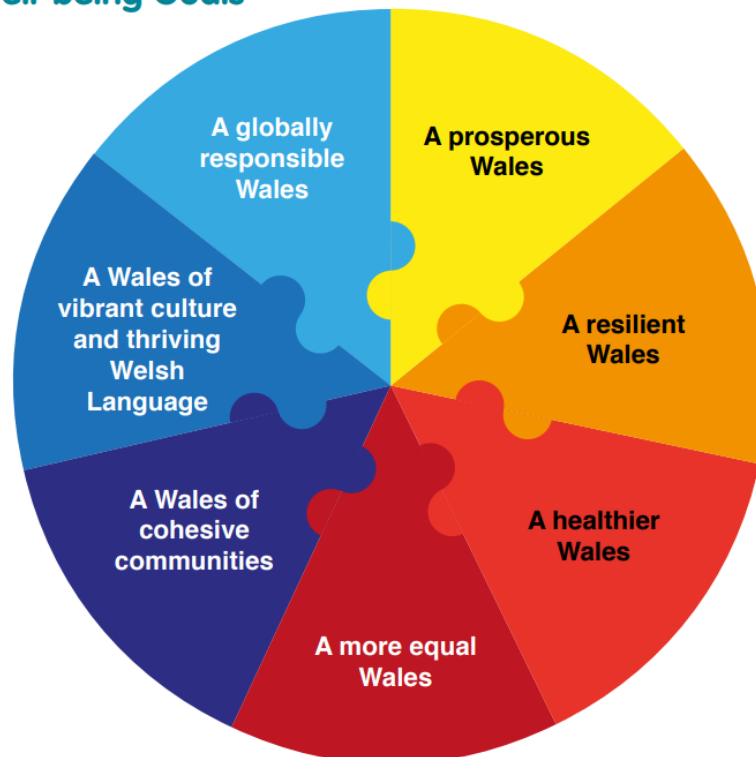
3. OUR VISION

- 3.1 The efficient and effective acquisition, management, use and release of property assets is fundamental to sound financial management and the delivery of exemplary public services. The right asset in the right place at the right time for the right purpose has to be what we are seeking to achieve.
- 3.2 This document sets out how we will accomplish this by:
- Providing timely reviews of asset condition, user needs, and expenditure demands to meet our current and future needs.
 - Delivering value for money for ourselves, service users and tenants.
 - Maximising our financial return on investment whilst being a fair and socially responsible landlord seeking to safeguard and strengthen social cohesion.
 - Supporting service needs as well as those of the people accessing services.
 - Providing assets that are in a sound condition, fit for purpose and compliant with legislation.
 - Being open and accessible and promoting collaboration over the shared use of our assets and consideration of community asset transfers where mutually beneficial.
 - Being proactive in adapting our assets to address the climate and biodiversity emergencies.
 - Using our assets creatively to provide exemplars of best practice which also deliver the Council's corporate objectives.
 - Helping to deliver vibrant, resilient, and sustainable communities.
 - Promoting innovation, embracing technology and data analytics to better manage our assets.
 - Embracing the benefits of corporate landlord in responsibly discharging our health and safety and maintenance obligations.

4. Acting sustainably with social responsibility

- 4.1 It is proposed that the seven well-being goals of the Well-being of Future Generations (Wales) Act 2015, be used to guide asset related decisions.

Well-being Goals



- 4.2 The Act requires the Council to carry out sustainable development which means that the Council acts in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. In doing so we are guided by 5 ways of working to help demonstrate the application of sustainable development principles, promote collaborative working, avoid repeating past mistakes and tackle some of the long-term challenges we are facing.

Five Ways of Working:

Long term



The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.

Prevention



How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

Integration



Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.

Collaboration



Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.

Involvement



The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.

5. OUR ASSETS

- 5.1 The Councils property portfolio has over 639 separately listed land and building assets with an estimated value in excess of £421 million. The assets (excluding those managed by Housing Services) are listed below:

Asset Type	Number
Archives/Arts/Libraries/Monuments/Museums/Theatre/TIC/Tourist Attraction	28
Cemetery Facilities	12
Commercial Properties	24
Community Centres/Facilities/Conference	49
Domestic Housing	9
Council Farms and Land	171
Day Care/Residential Care Homes/Social Care	31
Early years/Nursery/family centre/Health & Social Care	11

Highway's depots/Waste Management	26
Leisure Centres/Recreation Facilities	36
Livestock Markets	5
Offices	13
Schools/Pupil Referral Units/School Houses	109
Public Toilets	44
Workshops	16
Youth Centres	9
Misc.	24
Declared Surplus	15
Vacant	7

(Please note that this is a snapshot in time of asset numbers)

5.2 This diverse and dispersed portfolio represents an ongoing opportunity to flexibly adapt to changing needs and demands and to take advantage of emerging opportunities, while complying with legislative requirements, making a positive contribution to the Council's Medium-Term Financial Strategy and delivering its corporate objectives.

6. ACTION PLAN

6.1 The following actions are proposed to help the council achieve its vision for a well-managed property portfolio:

a) **Condition assessments/surveys:**

Properly recording and understanding the condition of council owned property assets is vital to ensuring their efficient and effective use. Robust information relating to the condition of the estate will enable the authority to make timely, informed choices and investment and divestment decisions. The absence of professionally conducted condition assessments/surveys has been identified as a corporate risk, which is why Strategic Property will ensure that all property asset, as set out in Part 5, are subject to an appropriate condition assessment or condition survey on a minimum five-year rolling basis. Our initial priorities are, schools, leisure centres and the farm estate and resources will be allocated accordingly.

- Key Performance Indicator: Percentage of assets with condition assessment or condition survey within the last 5 years:



b) **User Reviews and Action Plans:**

Securing regular feedback from those using the council’s estate, whether direct service providers or tenants, is vital to our dynamic understanding of how each premise works. It ensures that land and buildings continue to be fit for purpose, areas for improvement are identified and opportunities for repurposing, working differently or asset sale or transfer to meet changing market conditions or demands are considered. Coronavirus impacted the Strategic Property team’s ability to secure sufficient feedback to proactively manage the estate in a truly sustainable way. This Strategy proposes asset reviews are undertaken with all service areas and tenants annually, using a range of techniques, from light touch digital to face to face discussions. Information from these reviews will inform both user choice and corporate landlord decisions to deliver the Corporate Plan.

Key Performance Indicator:

- 2023/24 onwards – 100% of service areas and tenants have an annual asset review with clear action points as appropriate.

c) **A new Asset Management Policy:**

This Strategy is a high- level document, intended to provide clear and purposeful guidance for decision makers. The opportunity is being taken to further streamline our operational policies and practices by bringing together and abridging our corporate asset and farm estate policies together into a single Asset Management Policy. This will provide a comprehensive transparent and standardised approach to property management across the Council’s property portfolio. The Councils Corporate Asset Policy was last reviewed in 2017. To ensure that the Corporate Asset Policy is fit for purpose to achieve the councils’ objectives, a full review of the Corporate Asset Policy is to be implemented in 2022.

Key action:

- December 2022 – Corporate Asset Policy and Farm Estate Policy to be reviewed and a new Corporate Asset Policy adopted.

d) Asset Reviews:

Effective asset management is a dynamic process, requiring up to date intelligence, appraisal, review and costed planning.

This strategy requires each asset or, where appropriate, group of assets to be reviewed by Strategic Property every five years.

This “review” comprises a matrix methodology where competing pressures and interests are tested in a clear and consistent way, allowing all options to come to the fore. Avoiding arbitrary weighting mechanisms and not allowing any one aspect - such as price, to dominate, leads to agile, yet robustly evidential, decisions on potential and existing assets under consideration. Where decisions on the treatment of surplus assets have been reached a principal consideration will be the potential contribution to the revenue budget and the capital programme.

It is anticipated that the reviews, undertaken by Strategic Property, will produce a range of appropriate recommendations, for example to:

- Purchase an asset for use by the Council, and or its partners.
- Seek alternative uses and or tenants for an existing building.
- Seek co-uses and/or tenants to cost share, or more closely align services in an existing building.
- Retain/remodel/extend and invest in an existing asset.
- Seek external funding and or partners to improve or repurpose a building, for example improving its energy performance envelop, or generating on site electricity.
- Disinvest from land or property, consolidating assets or relocating to meet changing markets and demands.
- Respond to, or actively seek opportunities for Community Asset Transfers (sale or lease).
- Use tenancy renewals (leases) as an opportunity to seek more appropriate uses and or land management practices to meet the Council’s corporate objectives.

Each recommendation will be discussed with the relevant Portfolio Holder to optimise the performance of each asset or group of assets.

CONSIDERATION	KEY AREAS
Corporate Plan	• Corporate objectives.

	<ul style="list-style-type: none"> • Corporate values, actions, and targets.
Asset assessment/survey	<ul style="list-style-type: none"> • Asset condition, performance, and liabilities. • Opportunities. • Building utilisation/adaptability/objectives. • Asset energy performance. • Cost information, viability, and value for money. • Backlog maintenance and investment -projected spend over five years. • Property rationalisation, constraints, and opportunities. • Risks. • Potential for sustainable and beneficial improvement. • Protection of the built environment.
Compliance with legislation	<ul style="list-style-type: none"> • Health and safety. • Access and equalities. • Statutory compliance – fire safety, asbestos, legionella, electrical etc. • Legal situation leases, covenants and other restrictions, existing or to safeguard Council interests.
Environmental impact	<ul style="list-style-type: none"> • Sustainable development. • Climate emergency. • Biodiversity emergency. • Supporting the transition to a low carbon. • Partnership opportunities. • Energy efficiency. • Energy generation.
Community/ Social value/ cultural value	<ul style="list-style-type: none"> • Working with partners to identify opportunities. • Welsh language impact. • Cultural heritage. • Social impacts of investing in or withdrawing from an asset or community. • Social value and social return on investment. • A well-connected Powys enriching and making more resilient communities of place. • Working to empower communities to manage valued community assets or services.

	<ul style="list-style-type: none"> • Collaboration around opportunities. • Placemaking. • Building aesthetics and safeguarding listed and other valued building and community spaces.
Service area requirements	<ul style="list-style-type: none"> • Annual review and action plan information. • Working with service users and tenants to understand requirements. • Delivery of council services. • Innovation opportunities. • Forecasting of demand. • Changes in head count. • Possibilities for co-location.
Financial health	<ul style="list-style-type: none"> • Medium term financial strategy demands and return on capital borrowing. • Operating costs, recoverable and non-recoverable overheads • Rental income absolute, and potential. • Market value, book price and yields. • Capital information. • Revenue information. • Asset comparison with national indicators and market comparators. • Funding/grant opportunities to self or partners, including community groups. • Commercial investment opportunities. • Affordability - Whole life costs of options. • Finding viable, cost-effective solutions. • Benchmarking.
Equalities Impact	<ul style="list-style-type: none"> • Equalities Act 2010.
Health and wellbeing	<ul style="list-style-type: none"> • Creating opportunities for stronger, safer fairer and more resilient communities. • Adaptability of premises/accommodation to new working practices. • Building safety. • Neighbourliness, and any persistent issues such as noise pollution or environmental containment

	<ul style="list-style-type: none"> • Community accessibility.
Economy	<ul style="list-style-type: none"> • Supporting economic growth and regeneration. • Financial opportunities for Council and/or others. • Jobs creation/retention. • Supporting replacement Local Development Plans and Strategic Development Plans. • Seeking new opportunities to use land and buildings to add value to existing offer.
Technology and data	<ul style="list-style-type: none"> • Advancements in technology and data analytics are changing the way we utilise our assets. • Innovation in and opportunities for community broadband sharing etc.
Partnership working	<ul style="list-style-type: none"> • Collaboration opportunities within and across sectors. • Grant opportunities available to others. • Strategic effectiveness and actions of PSB and other partners.

Key Performance Indicators:

- 2023/24– At least 25% of assets have had an Asset Review undertaken within the last 5 years.
- 2024/25 – At least 50% of assets have had an Asset Review undertaken within the last 5 years. All assets within 18 months of any break clause or lease term end date, shall have had an Asset Review
- 2025/26 – At least 75% of assets have had an Asset Review undertaken within the last 5 years.
- 2026/27 onwards: 100% of assets have had an Asset Review undertaken within the last 5 years.

7. RESOURCES

- 7.1 This Strategy, although ambitious and moving at pace can be delivered by the Strategic Property with timely input from other services areas. Resources will, however, need to be closely monitored moving forward to ensure that deadlines are achieved or appropriately amended.

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

11 October 2022

REPORT AUTHOR: County Councillor Jake Berriman
Portfolio Holder for a Connected Powys

REPORT TITLE: Approval of the Powys Local Development Plan Annual Monitoring Report 2022 for submission to Welsh Government

REPORT FOR: Decision

1. Purpose

1.1 To approve the Powys Local Development Plan Annual Monitoring Report (AMR) 1st April 2021 to 31st March 2022 [AMR 2022] in readiness for its publication and submission to the Welsh Government no later than 31st October 2022.

2. Background

2.1 The Powys Local Development Plan (LDP) is a 15-year statutory development plan spanning the period 2011 to 2026. It was adopted by the Council in April 2018. Under current legislation it will cease to be the development plan for the Powys Local Planning Authority (LPA) area after its end date on 31st March 2026. The Powys LPA has therefore embarked on the preparation of a Replacement LDP for the period 2022-2037.

2.2 Legislation requires that an LPA must publish and submit to Welsh Government an Annual Monitoring Report (AMR) setting out how the objectives of the plan are being achieved.

2.3 The AMR assesses the extent to which the plan's strategy and key policies, sites and infrastructure requirements are being delivered. By basing each AMR on the results and commentary of the preceding year, trends can be identified, and it becomes clear how policies and proposals are delivering year on year.

2.4 The Welsh Government's Development Plans Manual: Edition 3 (2020) affirms that AMRs are the key mechanism to assess the delivery and implementation of a plan's strategy. They provide transparency in the planning process by keeping stakeholders and the community informed regarding the performance of the plan against the issues it has identified. AMRs must be approved by the LPA and submitted to Welsh Government by 31st October of the respective year.

2.5 AMR 2022, attached for approval as Appendix 1 to this report and with two supporting annexes (Appendices 1a and 1b), is to be submitted by the end of October this year as the statutory AMR. As monitoring is a continuous cycle, AMR 2022 builds on previous AMRs as submitted in October 2021 which contain the earlier monitoring results of the adopted LDP from its adoption date. Monitoring of the adopted LDP, and the subsequent Replacement LDP will be required to continue in future years.

2.6 The AMR also includes the Strategic Environmental Assessment (SEA) monitoring of the adopted LDP.

2.7 The AMR must be approved by the Cabinet before it is submitted to the Welsh Government. Alongside submission, the AMR must be published on the Council’s website by 31st October each year.

2.8 The Council’s internal LDP Working Group met in September to consider AMR 2022 and have recommended its approval to Cabinet and for its submission to Welsh Government.

3. Advice

AMR 2022 Findings

3.1 The Powys LDP is assessed against the Monitoring Framework set out in Chapter 5 of the adopted LDP. The AMR is based on the adopted Monitoring Framework but has been updated/modified where necessary to take account of new national policy requirements arising since plan adoption in April 2018. Where this has happened, the AMR explains what changes have been made to the original Framework and why. Implementation is shown visually using a colour coded system.

3.2 The AMR 2022 demonstrates that the adopted LDP is largely delivering and meeting the monitoring targets, pointing to successful policy implementation. Of the 62 monitoring indicators, 42 are “Green” where the monitoring is on target or completed and the action required is for monitoring to continue. Six are “Yellow” identifying that further investigation/research is required; four are “Amber” suggesting that a Policy Review is required; and four are “Red” indicating that a Plan Review is required as they relate to the delivery of the strategy. AMR 2022 identifies the remaining indicators as not applicable during this monitoring year.

3.3 The performance of the adopted LDP against each monitoring indicator is fully explained in the AMR (Appendix 1). The eight indicators indicating plan or policy reviews (which are colour coded red or amber) are:

Reference No.	Monitoring Indicator	Relevant LDP Policies
AMR2a	The annual level of housing completions monitored	Strategic Policy

	against the Average Annual Requirement. (AAR)	SP1 – Housing Growth
AMR2b	Total cumulative completions monitored against the anticipated cumulative completion rate.	Strategic Policy SP1 – Housing Growth
AMR4	Total housing units permitted on allocated sites (HA) as a % of overall housing provision.	Strategic Policy SP1 – Housing Growth Topic Based Policy H2 – Housing Sites
AMR5	Total housing units completed on Housing Allocations (HA).	Strategic Policy SP1 – Housing Growth Topic Based Policy H2 – Housing Sites
AMR27	Additional installed capacity (MW) of solar PV developments permitted within LSAs per annum.	Topic Based Policy RE1– Renewable Energy
AMR28	Number of community/district heating schemes permitted under Policy DM13 (criterion 15) per annum.	Development Management Policy DM13 – Design and Resources
AMR36	Number of developments permitted within Town Centres, which would result in less than: 75% of units within a Primary Shopping Frontage; 66% of units within Secondary Shopping Frontage; being for A1 and A3 uses.	Topic Based Policy R3 – Development Within Town Centre Areas
AMR59	Number of developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service.	Development Management Policy DM11 – Protection of Existing Community Facilities and Services

3.4 The growth strategy of the adopted LDP is primarily led by housing growth and the AMR (as with AMR 2021) identifies under-performance against the anticipated housing completions target rate. The cumulative number of net additional dwellings delivered since 2011 is 2,470 dwellings against the anticipated 3,036 dwellings. With four years left of the Plan period it is unlikely that the adopted LDP’s dwelling requirement figure of 4,500 new dwellings will be achieved over the Plan period (2011 – 2026) as the “catch-up” build rate for the period 2022 – 2026 would require 508 new homes to be built each year. (See Table 9 in AMR 2021).

3.5 The under-delivery of allocated housing sites continues to be identified as an area of concern which prompted the Review of the adopted LDP arising from AMR 2021 and confirms the need to proceed with the Replacement LDP. As set

out in AMR 2022, it remains the case that of the 80 Housing Allocation (HA) sites in the LDP, 54 (68%) still do not have any form of planning permission.

3.6 Within the AMR is a detailed assessment of the performance of the LDP against the statutory Strategic Environmental Assessment (SEA) monitoring objectives.

4. Resource Implications

4.1 The publishing and submission of the AMR does not have any additional resource implications.

4.2 The Head of Finance (Section 151 Officer) notes the content of the report.

5. Legal implications

5.1 Legal: It is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 76) and LDP Regulation 37 that the LPA prepares and submits an AMR to Welsh Government and as such the recommendations can be accepted from a legal point of view

5.2 The Head of Legal Services and Monitoring Officer has commented as follows: " I note the legal comment and have nothing to add to the report".

6. Data Protection

6.1 The proposal does not involve the processing of personal data.

7. Comment from local member(s)

7.1 The current adopted LDP and any subsequent replacement apply to all of Powys except those areas within the Brecon Beacons National Park.

7.2 The Council's internal LDP Working Group has been involved in the preparation of AMR 2022, and in considering how the Council should address the results arising from the annual monitoring process.

7.3 The process of preparing an LDP is regulated and opportunities are available to engage with the preparation process through formal consultation stages.

8. Impact Assessment

8.1 An assessment is not required in this instance as the process of preparation and submission of an AMR is a statutory requirement upon the Council.

9. **Recommendation**

9.1 It is recommended that Cabinet approve:

1. AMR 2022 with Annex 1 and Annex 2 in order for the AMR to be submitted to the Welsh Government by 31st October 2022 in accordance with the relevant legislation. It will be published concurrently on the Council's website.

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LIST OF APPENDICES

Appendix 1: Powys Local Development Plan Annual Monitoring Report 2022 (1 April 2021 to 31 March 2022)

Appendix 1a: AMR 2022 Annex 1

Appendix 1b: AMR 2022 Annex 2

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Powys Local Development Plan (LDP)

Annual Monitoring Report 2022

**1st April 2021 to 31st March
2022**



Chapters:

EXECUTIVE SUMMARY	6
MONITORING INDICATORS REQUIRING FURTHER ACTION	7
KEY FINDINGS FOR THIS AMR MONITORING PERIOD:	7
SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS.....	12
1. INTRODUCTION	14
2. ANALYSIS OF SIGNIFICANT CONTEXTUAL CHANGE / INDICATORS	15
2.1 NATIONAL CONTEXT.....	15
2.2 CHIEF PLANNING OFFICER LETTERS AND NRW LETTERS	21
2.3 REGIONAL CONTEXT.....	22
2.4 LOCAL CONTEXT	26
3. CONTEXTUAL INDICATORS	29
4. ANALYSIS OF CORE / KEY INDICATORS	37
Theme 1 – Planning for Growth in Sustainable Places.....	38
5. ANALYSIS OF LOCAL INDICATORS	67
Theme 1 – Planning for Growth in Sustainable Places.....	68
Theme 2 – Supporting The Powys Economy	116
Theme 3 – Supporting Infrastructure and Services.....	133
Theme 4 – Guardianship of Natural, Built and Historic Assets	141
Theme 5 – Supporting Healthy Communities	159
6. RESULTS OF SA/SEA INDICATORS	171
6.1 RESULTS FOR MONITORING PERIOD 1 ST APRIL 2021 TO 31 ST MARCH 2022.....	171
6.2 SUMMARY OF MAIN ISSUES AND TRENDS IDENTIFIED	171
SEA Topic: Biodiversity	172
SEA Topic: Population and Human Health	177
SEA Topic: Soil.....	189
SEA Topic: Water	195
SEA Topic: Air.....	200
SEA Topic: Climatic Factors.....	205
SEA Topic: Strategic Resources and Assets	210
SEA Topic: Cultural Heritage.....	216
SEA Topic: Landscape	228
SEA Topic: Geodiversity	232
7. CONCLUSION AND RECOMMENDATIONS	236
7.1 CONTEXTUAL CHANGES	236
7.2 RECOMMENDATIONS AND FINDINGS ARISING FROM THE MONITORING INDICATORS	237

Annexes:

- ANNEX 1 – TABLE 19 HOUSING ALLOCATIONS
- ANNEX 2 – TABLE 20 HOUSING COMMITMENTS

Tables:

TABLE 1. SUMMARY OF ACTIONS FROM THE 62 INDICATORS MONITORING INCLUDED WITHIN THE AMR DURING THE MONITORING PERIOD.....	6
TABLE 2. MONITORING INDICATORS THAT REQUIRE STRATEGY / POLICY ISSUES TO BE ADDRESSED WITHIN THE PROCESS OF PREPARING THE REPLACEMENT LDP.....	9
TABLE 3. MONITORING INDICATORS THAT REQUIRE FURTHER INVESTIGATION OR RESEARCH	11
TABLE 4. SUMMARY OF MONITORING ASSESSMENT AND ACTIONS FROM DEVELOPMENT PLANS MANUAL (EDITION 3).....	14
TABLE 5. THE NUMBER AND PERCENTAGE OF PEOPLE IN POWYS BY THEIR ECONOMIC ACTIVITY EITHER UNEMPLOYED, ECONOMICALLY INACTIVE OR ECONOMICALLY ACTIVE (INCLUDING BBNP). .	31
TABLE 6. NUMBER OF HOMELESSNESS CASES IN POWYS (INCLUDING BBNP).....	33
TABLE 7. ANNUAL AVERAGE HOUSE PRICES TAKEN FROM THE LAND REGISTRY HOUSE PRICE INDEX FIGURE FOR POWYS (INCLUDING BBNP)	35
TABLE 8. ANNUAL NET HOUSING COMPLETIONS AGAINST THE ANNUAL AVERAGE REQUIREMENT (AAR) FIGURE	41
TABLE 9. (21A) HOUSING TRAJECTORY AT 1ST APRIL 2022	42
TABLE 10. ACTUAL CUMULATIVE COMPLETIONS AGAINST THE CUMULATIVE COMPLETIONS TARGET	45
TABLE 11. ACTUAL CUMULATIVE AFFORDABLE DWELLING COMPLETIONS AGAINST THE CUMULATIVE COMPLETIONS TARGET	48
TABLE 12. NUMBER OF AFFORDABLE HOUSING COMPLETIONS BY TENURE.....	51
TABLE 13. AVERAGE AFFORDABLE HOUSING CONTRIBUTIONS SECURED AGAINST THE TARGET CONTRIBUTION FOR THE SUB-MARKET AREA DURING THE MONITORING PERIOD.	53
TABLE 14. AMOUNT OF EMPLOYMENT LAND PERMITTED ON ALLOCATED EMPLOYMENT SITES SINCE LDP ADOPTION.....	60
TABLE 15. NET NUMBER OF ADDITIONAL DWELLINGS DELIVERED IN THE MONITORING PERIOD AND SINCE THE LDP HOUSING PROVISION BASE DATE, AGAINST THE SETTLEMENT HIERARCHY TARGETS IN LDP POLICY SP6.	63
TABLE 16. RESIDENTIAL PLANNING PERMISSIONS GRANTED ON SITES ALLOCATED FOR HOUSING DURING MONITORING PERIOD.....	71
TABLE 17. RESIDENTIAL COMPLETIONS ON SITES ALLOCATED FOR HOUSING DURING THE MONITORING PERIOD.....	73
TABLE 18. AFFORDABLE HOUSING UNITS SECURED BY TYPE DURING THE MONITORING PERIOD.	79
TABLE 19. NUMBER OF AFFORDABLE HOUSING UNITS PERMITTED BY TENURE DURING THE MONITORING PERIOD.....	81

TABLE 20. NET NUMBER OF DWELLINGS PERMITTED IN THE MONITORING PERIOD AND SINCE THE LDP WAS ADOPTED AGAINST THE SETTLEMENT HIERARCHY TARGETS IN LDP STRATEGIC POLICY SP6.	88
TABLE 21. NUMBER OF NEW DWELLINGS GRANTED PLANNING PERMISSION IN SMALL VILLAGES IN MONITORING PERIOD.....	90
TABLE 22. DISTRIBUTION OF EMPLOYMENT LAND PERMITTED DURING THE MONITORING PERIOD ACROSS THE SETTLEMENT HIERARCHY, TOGETHER WITH THE CUMULATIVE TOTALS SINCE LDP ADOPTION.....	92
TABLE 23. AVERAGE DENSITY OF DEVELOPMENT PERMITTED BY SETTLEMENT TIER / DEVELOPMENT TYPE DURING MONITORING PERIOD.....	100
TABLE 24. APPLICATIONS PERMITTED IN MONITORING PERIOD, FOR EMPLOYMENT DEVELOPMENTS ON NON-ALLOCATED SITES IN THE OPEN COUNTRYSIDE AGAINST LDP POLICY.....	121
TABLE 25. APPLICATIONS PERMITTED IN THE MONITORING PERIOD FOR CHANGE OF USE IN PRIMARY OR SECONDARY RETAIL ZONES.....	126
TABLE 26. SUBMITTED DOCUMENTATION DETAILING LANDSCAPE CONSIDERATION FOR MAJOR APPLICATIONS IN THE OPEN COUNTRYSIDE DURING MONITORING PERIOD.....	156
TABLE 27. PLANNING PERMISSION PERMITTED FOR CHANGE OF USE OF EXISTING COMMUNITY FACILITIES OR SERVICES BY SETTLEMENT TIER DURING MONITORING PERIOD.....	170
TABLE 28. INDICATIVE CONDITION OF CONSERVATION FEATURES IN OR WITHIN 15KM OF THE POWYS BOUNDARY.....	174
TABLE 29. HEALTH AND LIFE EXPECTANCY AT BIRTH.....	179
TABLE 30. PERCENTAGE OF WORKING AGE POPULATION TO CHILDREN AND RETIRED POPULATION IN POWYS (2018, 2019 AND 2020 MID-YEAR ESTIMATES).....	181
TABLE 31. PERCENTAGE OF POPULATION AGED 75 AND OVER (2018, 2019 AND 2020 MID-YEAR ESTIMATES).....	182
TABLE 32. NET INFLOW OF YOUNGER ADULTS (AGED BETWEEN 20 AND 34) INTO POWYS (2018, 2019 AND 2020 MID-YEAR ESTIMATES).....	182
TABLE 33. TOTAL NUMBER OF POLICE RECORDED ROAD ACCIDENTS INVOLVING PERSONAL INJURY IN POWYS.....	184
TABLE 34. NUMBER OF CASUALTIES IN ROAD ACCIDENTS BY SEVERITY IN POWYS.....	184
TABLE 35. NUMBERS OF POLICE RECORDED CRIMES IN POWYS.....	186
TABLE 36. PERCENTAGE OF GREENFIELD LAND OUTSIDE DEVELOPMENT BOUNDARIES WHERE DEVELOPMENT PERMITTED.....	193
TABLE 37. PERCENTAGE OF WATER BODIES AT 'GOOD' STATUS WITHIN POWYS LDP AREA.....	198
TABLE 38. LEVELS OF AVERAGE NO ₂ , PM2.5 AND PM10 CONCENTRATIONS (IN µG/M ³) (RECORDED AS AIR QUALITY EXPOSURE INDICATORS) ACROSS POWYS.....	202
TABLE 39. ANNUAL MEAN CONCENTRATIONS OF NO ₂ (IN µG/M ³) AT MONITORING SITES IN POWYS, BY YEAR FROM 2013.....	204
TABLE 40. CARBON DIOXIDE EMISSIONS, EXPRESSED AS KT CO ₂ , IN POWYS FOR THE YEAR 2019....	209
TABLE 41. HISTORIC ENVIRONMENT DESIGNATION TOTALS FOR POWYS, 2021 TO 2022.....	218

TABLE 42. PERCENTAGE OF SCHEDULED MONUMENTS IN POWYS LDP THAT ARE IN A STABLE OR IMPROVING CONDITION.....	220
TABLE 43. PERCENTAGE OF LISTED BUILDINGS THAT ARE ‘AT RISK, ‘VULNERABLE’ OR ‘NOT AT RISK’ IN POWYS (2015).....	222
TABLE 44. PERCENTAGE OF LISTED BUILDINGS IN POWYS BY RISK SCORE (2015).....	222
TABLE 45. NUMBER AND PERCENTAGES OF PEOPLE WITH WELSH LANGUAGE SKILLS IN POWYS....	225
TABLE 46. PERCENTAGE OF POWYS POPULATION, AGED THREE OR OVER, WHO CAN SPEAK WELSH.	227
TABLE 47. PERCENTAGE OF ASPECT AREAS WITHIN, OR INTERSECTING, THE PLAN AREA THAT ARE OF ‘HIGH’ OR ‘OUTSTANDING’ QUALITY.....	231

Figures:

FIGURE 1. HOUSING DEVELOPMENT TRAJECTORY 2011 – 2026 ON 1 ST APRIL 2022	43
FIGURE 2. CHART SHOWING THE NUMBER OF ADDITIONAL DWELLINGS SINCE HOUSING PROVISION BASE DATE OF APRIL 2015 AGAINST THE NET ADDITIONAL DWELLING REQUIREMENT	46
FIGURE 3. CHART SHOWING AFFORDABLE HOUSING DELIVERY RATES COMPARED TO THE ANNUAL TARGETS.....	49
FIGURE 4. CHART SHOWING THE LOCATION OF WINDFALL DEVELOPMENT PERMITTED IN HECTARES ACROSS THE SETTLEMENT HIERARCHY BY PREVIOUSLY DEVELOPED LAND / GREENFIELD LAND.	96
FIGURE 5. CHART SHOWING PERCENTAGE OF AREA PERMITTED FOR DIFFERENT DEVELOPMENT PROPOSALS ON GREENFIELD LAND IN THE OPEN COUNTRYSIDE	96
FIGURE 6. CHART SHOWING THE NUMBER OF PLANNING APPLICATIONS PERMITTED ON NON-ALLOCATED EMPLOYMENT SITES BY SETTLEMENT HIERARCHY AND DEVELOPMENT TYPE IN MONITORING PERIOD.....	121
FIGURE 7. CHART SHOWING THE TOTAL TYPE AND NUMBER OF UNITS OF ACCOMMODATION PERMITTED IN THE MONITORING PERIOD.	129

Executive Summary

This is the third Annual Monitoring Report (AMR) for the Powys Local Development Plan (LDP). It covers the period 1st April 2021 to 31st March 2022 and is preceded by the Annual Monitoring Reports for 2021 (1st April 2020 to 31st March 2021) and 2020 (1st April 2019 to 31st March 2020) together with the Monitoring Review (covering the period from LDP adoption (17th April 2018) to 31st March 2019).

Following the findings of the previous AMR (AMR 2021) a review of the LDP was undertaken with the findings published in the LDP Review Report agreed by the Council in February 2022. The conclusions outlined in the Review Report determined that the Full Revision procedure is the most appropriate form of revision for the adopted Powys LDP. This means that a Replacement LDP will need to be prepared for the period 2022-2037. This will ensure that effective local decision making in planning can continue after the adopted LDP's "end-date" of 31 March 2026. Preparation has begun on the Replacement LDP with the production of a Delivery Agreement, which includes a Community Involvement Scheme. The Delivery Agreement details the official commencement of the preparation of the Replacement LDP as July 2022. Together with the Review Report the findings from this AMR and subsequent AMRs will be used to inform the preparation of the Replacement LDP.

The Monitoring Framework and the purpose of the AMR is explained in Chapter 5 of the Powys LDP.

Each AMR provides an assessment of whether the underlying LDP strategy remains sound, the impact of policies at the local and wider level and whether policies and related targets have been met or what progress is being made towards meeting them. The AMR provides an opportunity to capture the prevailing economic, social or cultural circumstances and contextual changes since the Plan's adoption which may have a bearing on the meeting of policy objectives and so builds an evidence base over time.

The AMR contains a total of 62 monitoring indicators which are used to monitor the effectiveness of the Plan and its policies. A summary of the outcome of this year's monitoring is provided below:

Table 1. Summary of Actions from the 62 Indicators Monitoring Included within the AMR during the Monitoring Period

Continue Monitoring	33 - Continue Monitoring 9 - Adopted SPG
Training Required	0
Supplementary Planning Guidance (SPG) Required	0
Further Investigation/Research Required	6
Policy Review Required	4
Plan Review	4
Not Applicable to this AMR monitoring period or superseded	6

Key Findings for This AMR Monitoring Period:

Section 2 of this AMR, the “Analysis of Significant Contextual Change / Indicators”, notes that as previously highlighted in AMR 2021, phosphate sensitive Riverine Special Areas of Conservations in the LDP area continue to be a constraint. Natural Resources Wales (NRW) issued a letter to Powys in December 2021, 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). Guidance was issued which was further revised in May 2021. The Usk and Wye catchments cover almost the entirety of the southern half of Powys, where this environmental constraint continues to have an impact on development coming forward

The results from Section 3 of this monitoring report, the “Contextual Indicators”, found that homelessness rates in the Plan area have continued to rise during the monitoring period by a further 117 cases. The causes of homelessness are varied and not straightforward; homelessness rates are impacted by the cost-of-living crisis, but also by the fact that average house prices in Powys are increasing at a higher rate than average income and continue, as with the previous monitoring period, to be disproportionate to each other. The housing affordability gap in Powys, therefore, continues to widen.

From the "Analysis of Core / Key Indicators" (Section 4) it was found that a total of 369 additional new homes were completed in the monitoring period. This is an increase on previous years and above the annual net additional dwelling requirement of 300 additional homes per year set out in the LDP. Cumulatively 2,470 new homes have been delivered since the LDP start date in 2011. The Plan set out to achieve an overall increase of 4,500 dwellings (known as the dwelling requirement figure) during the 15-year period. The 2,470 additional new homes represent only 55% of the LDP overall housing target. With four years of the LDP remaining, it is unlikely that the shortfall of 2,030 housing units will be delivered by 2026. To make up for slower performance in earlier years an average completion rate of 508 homes per year would need to be achieved.

Out of the 369 additional new homes delivered in the monitoring period, 105 of these were for affordable homes. This demonstrates a sustained increase in the delivery of affordable housing over the past two monitoring periods. This means that since the Plan's start date in 2011, 708 affordable homes have now been delivered, representing 74% of the LDP target of 952 new additional affordable homes. Taking into consideration the number of affordable homes that have been granted planning permission, including those under construction, it is anticipated that the target will be met.

Further analysis of the housing completions data found that 264 (71%) of the additional new homes delivered in the monitoring period, were located on windfall (non-allocated) sites, which are contributing strongly to the supply of new homes. However, only 67 additional new homes have been completed on allocated housing sites, against a target figure of 372 dwellings during the monitoring period. Although there is sufficient land allocated in the LDP to meet the identified housing requirement, sites are not coming forward and progressing as anticipated. There are 80 housing sites allocated in the LDP, of which 54 (68%) do not have any form of planning permission.

Analysis of planning permissions granted during the monitoring period found that planning permission was granted for 354 additional new homes, of which 98 units are classified as affordable. Towns and Large Villages are at the top of the sustainable settlement hierarchy and are the location for 81% of the additional new homes permitted during the monitoring period, which accords with the Plan's Spatial Strategy.

The results from the monitoring indicators relating to employment land found that during the monitoring period, planning permission was granted on 3.588 ha of land for employment uses (B1, B2 and B8) meaning a total of 24.156 ha has been granted since the LDP was adopted. Out of the 8.708 ha granted, 0.745 ha (four planning applications) were located on allocated employment sites. This annual monitoring report has also found that employment safeguarded sites are being protected for employment uses in accordance with policy.

An analysis of monitoring indicators relating to renewable energy found that during the monitoring period, planning permission was granted for 1.433MW of renewable, zero or low carbon electricity. Since the LDP was adopted (2018) planning permission has been given for total of 38.164MW of energy generation, equating to 62% of the 61.7MW anticipated energy contribution detailed in the LDP. In addition to the 1.433MW permitted, an application for a windfarm at Llanbrynmair, consisting of 30 wind turbines, with the potential to generate 90MW of electricity, was approved by the Secretary of State in December 2021 (BERR/2009/0004).

Continuing the theme from previous annual monitoring reports, monitoring indicators noted that proposals for tourism development remain strong. During this monitoring period 92 applications for tourism development gained planning permission, all were in accordance with LDP Policy TD1. The planning applications permitted equated to a total of 240 units of tourism accommodation (12% of which were static caravans). It is notable that 95% of the tourism applications permitted were in the Open Countryside, with 71 applications for development on greenfield sites.

Within this report is a detailed assessment of the performance of the LDP against the SEA monitoring objectives (see Section 6) which involves monitoring 34 indicators across several topic areas. The Review Report summarised the main findings of the SEA monitoring, identifying the main issues and trends that have emerged since the LDP was adopted. Trends towards an ageing population have continued during this monitoring period, whilst the proportion of Welsh speakers has started to recover following the previous downward trend. Improvements are also noted in the way that certain environmental constraints are being considered in the planning process. The SA/SEA framework will be reviewed as part of the Integrated Sustainability Appraisal process that is necessary to inform preparation of the Replacement LDP.

Data from the Census 2021 is being released in stages, with the first set released in June 2022. This data will be captured and analysed during the next monitoring period and will be reported on in AMR 2023.

Monitoring Indicators Requiring Further Action

The majority (33) of the monitoring indicators continue to show positive policy implementation, with a further nine that show the successful adoption of SPG. There are, however, some indicator targets that are not being achieved (14) and thus trigger points have been reached. This indicates that there are LDP policies that are not functioning as intended, in these instances the monitoring has recommended actions, including in some cases the review of a policy.

There are eight monitoring indicators that require strategy / policy issues to be addressed. This will be undertaken within the process of preparing the Replacement LDP. The eight monitoring indicators are:

Table 2. Monitoring Indicators that Require Strategy / Policy Issues to be Addressed within the Process of Preparing the Replacement LDP

Reference No.	Monitoring Indicator	Relevant LDP Policies
AMR2a	The annual level of housing completions monitored against the Average Annual Requirement. (AAR)	Strategic Policy SP1 – Housing Growth
AMR2b	Total cumulative completions monitored against the anticipated cumulative completion rate.	Strategic Policy SP1 – Housing Growth
AMR4	Total housing units permitted on allocated sites (HA) as a % of overall housing provision.	Strategic Policy SP1 – Housing Growth Topic Based Policy H2 – Housing Sites
AMR5	Total housing units completed on Housing Allocations (HA).	Strategic Policy SP1 – Housing Growth Topic Based Policy H2 – Housing Sites
AMR27	Additional installed capacity (MW) of solar PV developments permitted within LSAs per annum.	Topic Based Policy RE1– Renewable Energy
AMR28	Number of community/district heating schemes permitted under Policy DM13 (criterion 15) per annum.	Development Management Policy DM13 – Design and Resources
AMR36	Number of developments permitted within Town Centres, which would result in less than: 75% of units within a Primary Shopping Frontage; 66% of units within Secondary Shopping Frontage; being for A1 and A3 uses.	Topic Based Policy R3 – Development Within Town Centre Areas

Reference No.	Monitoring Indicator	Relevant LDP Policies
AMR59	Number of developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service.	Development Management Policy DM11 – Protection of Existing Community Facilities and Services

There are six monitoring indicators that require further investigation or research, these being:

Table 3. Monitoring Indicators that Require Further Investigation or Research

Reference No.	Monitoring Indicator	Relevant LDP Policies
AMR9	Changes in residual values (housing development viability) across the 4 sub-market areas, set against the residual values applied in the Viability Assessment Update (August 2016).	Strategic Policy SP3 – Affordable Housing Target Topic Based Policy H5 – Affordable Housing Contributions
AMR15	Amount of employment land (hectares) permitted on allocated sites in the Development Plan as a % of all employment allocations.	Strategic Policy SP2 – Employment Growth Topic Based Policy E1 – Employment Proposals on Allocated Employment Sites Topic Based Policy E2 – Employment Proposals on Non-Allocated Employment Sites
AMR16	Retail development up to 1,000 square metres net permitted and delivered on part of the mixed use site allocated under Policy R2.	Strategic Policy SP4 – Retail Growth Topic Based Policy R2 – Retail Allocations
AMR19	Net employment land permitted within each settlement tier measured as a percentage of all employment land permitted.	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
AMR20	Amount (hectares) and location of windfall development permitted on previously developed land and greenfield land.	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
AMR21	The average overall density (units per hectare) permitted in respect of housing developments in Towns, Large Villages, Small Villages and Rural Settlements.	Topic Based Policy H4 – Housing Density

Summary of Conclusions and Recommendations

The results from the analysis of the monitoring indicators for the monitoring period, indicate that the LDP policies are largely delivering and meeting the targets set out in the Annual Monitoring Framework, with 42 of the 62 monitoring indicators showing positive policy implementation. This includes nine Supplementary Planning Guidance documents being published since the LDP was adopted. With this level of monitoring targets achieved, it demonstrates that the majority of the policies in the Powys LDP, adopted in 2018, have delivered successfully on the sustainable growth and many of the land use objectives the LDP sought to achieve.

The cumulative number of net additional dwellings delivered (2,470 dwellings) is below what was anticipated (3,036 dwellings) giving a shortfall of 566 dwellings at the end of this monitoring period. There are only four years remaining of the plan period therefore it is unlikely that 4,500 new dwellings will be delivered to meet the LDP dwelling requirement figure by the end of the plan period (end of March 2026). The LDP Growth Strategy is primarily led by housing growth, therefore the poor performance in the monitoring indicators (AMR2a, AMR2b) that relate to housing completions demonstrate that the Plan's overall strategy is not being delivered. As a consequence, during the preparation of the Replacement LDP the dwelling requirement figure will be revised. This will include looking at the latest evidence relating to past build rates, population projections and the Local Housing Market Assessment (LHMA).

There are 80 sites allocated for housing in the LDP, of which 54 (68%) do not have any form of planning permission. The cumulative total of the annual completion target of additional dwellings to be delivered on allocated sites, over the four years since LDP adoption equates to 1,217 dwellings. The actual number of dwellings delivered on allocated housing sites over the four-year period (1st April 2018 – 31st March 2022) was only 155 dwellings, meeting just 13% of the target. Out of the 80 housing allocation sites, 22 are located within a phosphate sensitive river Special Area of Conservation (SAC) catchment. This means that the necessary planning permissions cannot be readily granted unless applications are able to demonstrate phosphate neutrality or betterment. Which, without the local sewerage wastewater treatment works having phosphate stripping (and the associated up-to-date permit, aligned with the present targets) in place, is not currently possible.

As part of the preparation of the Replacement LDP there will be a 'call for sites', whereby any party will be able to put forward a site (candidate site) to be considered for development. All sites submitted will be assessed to determine if they are sustainable, deliverable and viable in accordance with the Development Plans Manual (Edition 3) and the emerging strategy in the Replacement LDP. The site assessment process will determine which of the submitted candidate sites should progress to become allocations in the Replacement LDP. Allocations in the adopted LDP that do not have an extant planning permission will need to be submitted during the call for sites and will be assessed alongside the rest of the submissions.

LDP policies relating to retail frontages, solar Local Search Areas, community/district heating schemes and protection of community facilities and services are not being implemented as intended. The preparation of the Replacement LDP will be used as an opportunity to review these policies

There are six areas where it is recommended that further investigation or research is required. All research / further investigation undertaken will be used as evidence to inform the preparation of the strategy, policies and proposals in the Replacement LDP and will be published alongside the consultation versions of the emerging Plan.

1. Introduction

1.01 The LDP monitoring framework on which this Annual Monitoring Report (AMR) and subsequent AMRs is based now includes a total of 62 monitoring indicators, which are set out in Chapter 5 of the LDP or are a requirement of the Development Plans Manual (Edition 3, 2020). The monitoring indicators are used to monitor the effectiveness of the Plan and its policies.

1.02 The AMR includes an analysis and a recommended action for each monitoring indicator. The colour codes and actions identified for each indicator align with Table 4 and are consistent with the Development Plans Manual (Edition 3).

1.03 Further to publication of AMR 2021 and the statutory post-adoption 4-year review of the LDP which was published in the Review Report, the Council has determined that a full review of the LDP is appropriate and work on a Replacement LDP will commence from July 2022 in accordance with the timings of the approved Delivery Agreement, which was approved by the Council in March 2022 prior to submission to Welsh Government. The findings of this AMR and the Review Report must be taken into account in the preparation of the Replacement LDP.

Table 4. Summary of Monitoring Assessment and Actions from Development Plans Manual (Edition 3)

Continue Monitoring - Development plan policies are being implemented effectively.
Training Required - Development plan policies are not being implemented as intended and officer or Member training is required.
Supplementary Planning Guidance (SPG) Required - Development plan policies are not being implemented as intended and further guidance is required, potentially preparing additional SPG.
Further Investigation/Research Required - Development plan policies are not being implemented as intended and further research and/or investigation is required.
Policy Review Required - Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.
Plan Review - Development plan policies are not being implemented and the plan's strategy is not being delivered, triggering a formal review. (Following the Review of the adopted LDP this action has been changed to “To be Reconsidered in Replacement LDP”).

2. Analysis of Significant Contextual Change / Indicators

2..01 A summary and review of wider contextual issues and changes which have occurred during this monitoring period within which the LDP operates, i.e. external strategies/policies.

2.1 National Context

The Conservation of Habitats and Species Regulations 2017, Regulation 16A (January 2021)

2.1.1 On 1st January 2021 changes came into force in relation to the Habitats Regulations 2017 following the completion of the process of United Kingdoms (UK) withdrawal from the European Union (Brexit). Most of the changes in the 2019 EU Exit Regulations involved transferring functions from the European Commission to the appropriate authorities in England and Wales.

2.1.2 The main changes are enshrined in Regulation 16A:

- The creation of the “National Site Network” (to replace references to Natura 2000 and European Sites) within the UK comprising all the protected sites already designated under the Nature Directive, and any further sites designated under the Regulations;
- The establishment of management objectives for the National Site Network;
- A duty for appropriate authorities to manage and where necessary adapt the National Site Network to achieve the network objectives;
- An amended process for the designation of Special Areas of Conservation (SAC);
- New arrangements for reporting the implementation of the Regulations (now the UK no longer reports to the European Commission);
- Arrangements replacing the European Commission’s functions with regard to the imperative reasons of over-riding public interest (IROPI);
- Arrangements for amending the schedules to the regulations and the annexes to the Nature Directive that apply to the UK.

All Ramsar wetland sites remain protected in the same way as SACs and SPAs.

2.1.3 Following a judicial review, Justice Lieven made clear that while the 2019 Regulations themselves were lawful, they should not be interpreted or used to do anything that would previously have been unlawful. Therefore, despite changes to the wording, the legal position and the duties to maintain or restore sites to favourable conservation status remain unchanged and sites cannot be de-notified without following the proper procedure.

2.1.4 The Wildlife and Countryside Act 1981 has also been amended so that species of wild birds found in or regularly visiting either the UK or the European territory of an EU Member State will continue to be protected.

Welsh Government: Net Zero Wales Carbon Budget 2 (2021-25) (October 2021)

2.1.5 This Plan follows on from Prosperity for All: A Low Carbon Wales which covered the first carbon budget (2016-2020). It fulfils the Welsh Ministers’ statutory duty to prepare and publish a report before the end of 2021, setting out Welsh Government’s proposals and policies for meeting Carbon Budget 2. It contains 123 policies and proposals and sets out the next stage in the reduction of greenhouse gas emissions, with the intention of Wales having a trajectory to net zero by 2050.

Welsh Government: All Wales Plan 2021-25 Working Together to Reach Net Zero (April 2022)

2.1.6 Alongside Net Zero Wales Carbon Budget 2, the first All Wales Plan has been published, which demonstrates the commitment from partners in working together to reach Net Zero. As part of the Pledge Campaign launched in 2019, Welsh Government has received 118 pledges for action from businesses, the public sector, communities, schools and other groups and organisations, which are showcased by the All Wales Plan. The All Wales Plan also includes case studies of actions already taken, including local examples in Powys, and recognises the crucial role of children and young people in raising awareness and concerns about climate change.

Beyond Recycling (March 2021)

2.1.7 The Beyond Recycling strategy lays out the steps to be taken over the next ten years in the Welsh Government's pathway towards achieving a circular economy. Beyond Recycling is structured around six core themes:

1. Driving innovation in materials use
2. Upscaling prevention and re-use
3. Building on our recycling record
4. Investing in infrastructure
5. Enabling community and business action
6. Aligning Government levers

2.1.8 The aim is to keep resources in use for long as possible and to avoid waste. The goals include: one planet resource use, for there to be zero waste by 2050, for there to be net zero emissions from waste, to maximise economic potential and to make resource efficiency part of Welsh culture.

Strategic Assessment for the Future Need for Energy from Waste Capacity in the Three Economic Regions of Wales (March 2021)

2.1.9 This Strategic Assessment published by the Welsh Government confirms the announcement of a moratorium on any future large scale (10MW or greater installed capacity) energy from waste developments. It also updates and replaces the residual waste arisings estimates and forecast scenarios in the 2012 Collections Infrastructure and Markets Sector Plan, which Technical Advice Note (TAN) 21: Waste, advises should be used in assessing the level of need for energy from waste facilities and the extent of any capacity gap. The document refers to the key decision-making principles applied by Planning Policy Wales relating to the waste hierarchy, proximity (nearest appropriate installation) and self-sufficiency in terms of developing integrated and adequate network facilities for the management of mixed residual municipal waste.

Adapting to Climate Change: Guidance for Flood and Coastal Erosion Risk Management Authorities in Wales (August 2021)

2.1.10 The guidance supports the National Strategy for Flood and Coastal Erosion Risk Management (FCERM) published in 2020. It has been prepared by Natural Resources Wales on behalf of the Welsh Government. Its purpose is to assist Risk Management Authorities in Wales to consider the impacts of climate change when planning and

developing flood and coastal erosion risk management projects and strategies. The guidance replaces the previous 2017 version.

Electric Vehicle Charging Strategy for Wales: Facilitating the Transition to Net Zero (March 2021)

2.1.11 This strategy delivers a vision for electric vehicle charging to meet Wales' unique requirements. It sets out where Wales is now in providing electric charging for cars and vans, the charging needs for the decade, and how these can be met.

2.1.12 The strategy assumes two scenarios being most likely – “fast charging dominant” and “rapid charging dominant”. It identifies a predicted requirement of 31,130 fast and rapid direct current (DC) charging points for Powys by the year 2025, rising to 93,945 fast and rapid charging points by 2030. Slow charging at 3.6kW typically occurs over 8-12 hours in the domestic/workplace environment. Fast charging points are mainly rated at 7kW or 22kW and should deliver full charges over 4-6 hours, and are typically found in supermarkets, car parks etc. Rapid (and ultra-Rapid) charging points tend to be found at motorway services or on major roads and deliver power at 43 – 50kW, providing an 80% battery charge in 20 minutes. The fast-charging scenario does not require significant vehicle efficiency or battery performance improvements, whereas the rapid charging scenario is predicated on continued improvements in car battery size and performance, and enhancements to the grid network to meet the additional electrical demand. Powys is identified within the strategy as one of the higher charging demands across Wales due to its rural nature.

The Second State of Natural Resources Report (SoNaRR) (December 2020)

2.1.13 The Environment (Wales) Act 2016 requires Local Planning Authorities (LPAs) to have regard to the SoNaRR published by Natural Resources Wales, which provides an evidence base for LPAs when revising LDPs. This second report builds on the evidence base in the first SoNaRR of 2016 and illustrates some of the key challenges, priorities and opportunities for the sustainable management of natural resources. It is framed around the twin challenges of the nature and climate change emergencies Wales faces. It also identifies three areas for transformative change – the food, energy and transport systems and sets out a range of opportunities for action to move towards a sustainable future.

Llwybr Newydd - The Wales Transport Strategy (2021)

2.1.14 The new Transport Strategy for Wales sets out the Welsh Government's vision for how the transport system can help deliver priorities for Wales. It sets out the short-term priorities for the next five years and long-term ambitions for the next 20 years, along with nine mini plans explaining how they will be delivered for different transport modes and sectors. The strategy requires governments, local authorities, transport providers (both commercial and third sector) and colleagues in other policy areas to work together to ensure that transport contributes to the current and future well-being of Wales. This national strategy sets the framework for the two tiers of transport plans in Wales – the National Transport Finance Plan and Joint Local Transport Plans. The strategy and policies of the Replacement LDP will need to be consistent with these plans and strategies.

A Guide to Future Wales: Frequently Asked Questions (2nd Edition) (September 2021)

2.1.15 This guide addresses common questions raised by local planning authorities following the publication of Future Wales in February 2021, and supplements Edition 1 which was published in support of Future Wales. Edition 1 continues to apply, and addresses mainly process and procedural questions, whilst the 2nd Edition focuses more on policy matters. The 2nd Edition provides clarification on Strategic Development Plans and Corporate Joint Committees, Green Belts, directing development to town centres, Mobile Action Zones, 'gigabit capable' broadband infrastructure, and dwelling density.

Planning and Environment Decisions Wales (October 2021)

2.1.16 The organisation responsible for determining planning appeals and environment casework in Wales changed on 1st October 2021. The former service, known as Planning Inspectorate (PINS) Wales, has been replaced with a new service, named: Planning and Environment Decisions (PEDW), which will operate as a new Division within the Welsh Government. PEDW will be responsible for the examination of the Replacement LDP.

Town and Country Planning (General Permitted Development) (Amendment) (No.2) (Wales) Order 2021 (April 2021)

2.1.17 To support the reopening of businesses and their efforts to create safe environments for the public to feel confident to return to the high street, hospitality and tourism sectors post-Covid 19 pandemic, the Welsh Government temporarily relaxed planning control for specified development through amendments to the Town and Country Planning (General Permitted Development) Order 1995. The provisions within the Amendments Order allowed for additional temporary use of land, holding of markets by or on behalf of a local authority, temporary changes of use in town centres, and outdoor servery provision and awnings for hospitality. The temporary permitted development rights took effect from 30th April 2021 to 3rd January 2022; therefore, these development rights have now been withdrawn.

A New Approach to Undertaking Local Housing Market Assessments (March 2022)

2.1.18 This new approach developed by the Welsh Government and local authority experts is aimed at providing a consistent approach towards undertaking Local Housing Market Assessment (LHMAs) for all authorities. The approach involves a new LHMA Microsoft Excel tool, along with LHMA guidance and LHMA report templates, expected to be used by local authorities when undertaking their LHMAs. LHMAs will need to be rewritten every five years and refreshed once during that five-year period (between years two and three). Local authorities are also required to submit their LHMA to Welsh Government for review.

2.1.19 The Local Authority will be using this new approach in order to undertake a new LHMA for Powys for the period 2022-2037 (which will align with the proposed plan period for the Replacement LDP). This will involve a collaborative approach led by the Local Housing Authority, involving the Local Planning Authority and the Brecon Beacons National Park Authority, and other relevant Council services and stakeholders. The possibility of undertaking the LHMA jointly within the Mid Wales region will also be explored.

2.1.20 The LHMA will form a fundamental part of the evidence base for the Replacement LDP, alongside the latest Welsh Government local authority level household projections, the Well-being Plan for the area, and other evidence relating to viability and deliverability.

Welsh Government Announcement of the Three-Pronged Approach to Address Second Homes Crisis (July 2021)

2.1.21 The Welsh Government announced a three-pronged approach to address the impact of second home ownership on communities in Wales. The approach will focus on:

- Support – addressing affordability and availability of housing;
- Regulatory framework and system – covering planning law and the introduction of a statutory registration scheme for holiday accommodation;
- A fairer contribution – using national and local taxation systems to ensure second homeowners make a fair and effective contribution to the communities in which they buy.

2.1.22 As part of its approach, the Welsh Government consulted separately on proposed changes to local taxes for second homes and self-catering accommodation; proposed changes to planning legislation and policy for second homes and short-term holiday lets; and a draft Welsh Language Communities Housing Plan.

2.1.23 The proposed changes to the planning system are intended to enable a targeted local approach to address what Welsh Government considers is a local issue, particularly in coastal and rural areas. The legislative changes would create new/amended Use Classes for Primary Homes, Secondary Homes and Short-Term Lets. Changes between these Use Classes would be allowed under permitted development. However, Local Planning Authorities could use Article 4 directions and/or planning conditions to control changes of use in specific local areas where supported by evidence. The wording of Planning Policy Wales would also be changed to require local authorities to take account of the prevalence of second homes and short-term holiday lets in a local area when considering housing requirements, affordability and policy approaches for LDPs.

Welsh Development Quality Requirements 2021 (August 2021)

2.1.24 Welsh Government published the Welsh Development Quality Requirements 2021 'Creating Beautiful Homes and Places' (WDQR 2021), which came into force on 1st October 2021. WDQR 2021 sets out new quality requirements for social housing centred on flexibility, space and sustainability. It identified the minimum functional quality standards for both new and rehabilitated general needs affordable homes. The standard applies in full to all publicly funded affordable housing schemes. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) or planning conditions will only be required to meet the Appendix A and Appendix B "space requirements".

Acceptable Cost / On Costs for Use with Social Housing Grant Funded Housing in Wales (August 2021)

2.1.25 The Welsh Government published new Acceptable Cost Guidance (ACG), to replace previous guidance published in 2015 and revised Annexes A and B published in 2018. The guidance is intended to assist housing providers in deciding on the acceptability of scheme cost projects receiving grant e.g., Social Housing Grant (SHG). The new guidance involves moving away from a fixed grant rate of 58% towards a Standard Viability Model. The revised ACGs are based on works only and do not include land acquisition costs. They are also based on the assumption that construction costs of homes do not vary significantly across Wales and, therefore, the former ACG bands will no longer be used, with costs now standardised across all areas of Wales. The new ACGs account for movements in tender

price and changes to Welsh Building Regulations and also reflect the Welsh Development Quality Requirements 2021 noted above.

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion (made available September 2021)

2.1.26 In September 2021, a new version of TAN 15 was made available by the Welsh Government this was in advance of the date that it was due to come into effect, the 1st December 2021. The revised TAN, which will also replace TAN 14: Coastal Planning, is to be accompanied by a new Flood Map for Planning, which will replace the Development Advice Maps. The revised TAN introduces important changes to the way flood and coastal erosion risks are to be considered in the planning process to ensure the planning system recognises the threat of, and takes action to adapt to, the likely effects of climate change on flood risk and coastal erosion. The risks associated with climate change will be built into planning policies and decisions by using the Flood Map for Planning, which includes flood risk zones showing future risk under a climate change scenario.

2.1.27 In November 2021 (in a letter), the Welsh Minister confirmed that the coming into force of the revised TAN 15 and Flood Map for Planning would be suspended until 1st June 2023 in order to enable Local Planning Authorities (LPA) to consider fully the impact of the climate change projections on their respective areas. The Minister also required every LPA (in its letter dated December 2021) to complete or review a Strategic Flood Consequences Assessment (SFCA) for their area, either individually or on a regional basis. The revised TAN 15 and Flood Map for Planning will inform the Replacement LDP, alongside a new SFCA commissioned in May 2022, which will be used to inform the LDP's strategy, policies and proposals.

Active Travel Act Guidance (July 2021)

2.1.28 This guidance replaces previous guidance on Active Travel and is split into two parts. Part 1 provides an outline summary of the aims, processes and key considerations associated with the duties of the Active Travel (Wales) Act (2013). Whilst Part 2, provides detailed technical advice on how infrastructure should be planned and designed. The vision is for walking and cycling to be the natural mode of choice for short everyday journeys, or as part of a longer journey in combination with other sustainable mode. With the 15-year ambition to be for a comprehensive network of safe, direct, cohesive, comfortable and attractive walking and cycling routes within and connecting to key settlements across Wales.

The Planning (Listed Buildings and Conservation Areas) (Wales) (Amendment) Regulations 2021 (August 2021)

2.1.29 These Regulations amend Regulation 9 of the Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012 by removing the requirement for Local Planning Authorities (LPAs) to submit their own applications for Listed Building Consent (LBC) which relate to the alteration or extension of a listed building within their own area, to the Welsh Ministers to determine. Such applications by LPAs must now be made to the LPA, and not be determined by:

A committee or sub-committee of the LPA which is wholly or partly responsible for the management of any building to which the LBC application relates, or

By an officer of the LPA if their responsibilities include any aspect of the management of any building to which the LBC application relates.

2.1.30 LBC applications by LPAs which relate to the demolition (as defined by case law) of a listed building, as well as Conservation Area Consent applications by LPAs, will still be required to be submitted to, and determined by, the Welsh Ministers.

2.1.31 In circumstances where LPAs are minded to grant LBC, there will remain the requirement for LPAs to notify the Welsh Ministers, via Cadw, of their intention to do so, in accordance with Section 13 of the Planning (Listed Buildings and Conservation Areas) Act 1990, subject to any directions issued by the Welsh Ministers or delegated authority which would dis-apply this requirement.

Statutory Register of Historic Parks and Gardens in Wales (February 2022)

2.1.32 The Statutory Register of Historic Parks and Gardens in Wales came into force on 1st February 2022. Following on from the Historic Environment (Wales) Act (2016), a duty has been placed on the Welsh Ministers to compile and maintain a register of sites of special historic interest in Wales that includes: parks; gardens; designed ornamental landscapes; places of recreation; and other designed grounds. The statutory register replaces the previous non-statutory register and currently includes nearly 400 sites across Wales, with new sites to be incorporated as they are identified. The creation of the statutory register does not impose any new legal restrictions on Wales's historic parks and gardens and does not introduce a new consent regime. Registered sites will continue to receive the current level of protection through the planning system.

2.1.33 Local Planning Authorities are expected to take the register into account when preparing LDPs and to consider the effect of a proposed development on a registered site or its setting as a material consideration in the determination of planning applications.

2.2 Chief Planning Officer Letters and NRW Letters

Chief Planning Officer Clarification Letter, Regional Technical Statements for Aggregates 2nd Review (November 2021)

2.2.1 This policy clarification letter rectifies an arithmetical error in Table 5.3 of the Regional Technical Statements (RTS) for Aggregates 2nd Review. This error affects the apportionment calculations for all authorities in the "Former Gwent" sub-region and also Cardiff and Rhondda Cynon Taff in the Cardiff City sub-region. The arithmetical error concerns the average house completions figure for Torfaen which incorrectly states the figure as 313. The correct figure should have been 174.6. This in turn requires updating of the apportionment calculations and consequential amendments to various paragraphs in the Main Report and Appendix B South Wales. The changes do not affect the overall approach outlined in the RTS and the methodology remains unchanged. The clarification does not require local authorities to re-endorse the RTS.

Chief Planning Officer Letter, Guidance on Fire and Rescue Authorities becoming Statutory Consultees (November 2021)

2.2.2 This letter explains changes made to procedure orders in order to introduce Fire and Rescue Authorities (FRA) in Wales as statutory consultees (including reference to specialist

consultees) for certain types of development at both pre-application and post-submission stages. The key planning matters of consideration and focus of the FRA's responses will be access (ensuring adequate access to a site for appropriate numbers and types of FRA appliance) and water (ensuring adequate supply of water for fire-fighting purposes).

2.2.3 The Welsh Government has produced guidance to inform FRAs of the requirements placed upon them. The guidance highlights the importance of considering fire safety and the views of fire safety experts as early as possible in the planning and design of a new development. FRAs are encouraged to engage with LPAs about fire safety issues in their area during the preparation and review of relevant LDPs. Involvement at the plan-making stages provides an opportunity to influence placemaking and wider strategic development. Involvement in the LDP process assists in considering safety for the wider area, including the threat of wildfires, and further facilitates access for firefighting and potential changes to frontline FRA resources.

Chief Planning Officer Letter, Best and Most Versatile Agricultural Land and Solar PV Arrays (March 2022)

2.2.4 The purpose of this letter was to clarify that in accordance with Welsh Government policy, where Best and Most Versatile (BMV) land is identified within a proposed solar PV array development, considerable weight should be given to protecting such land from development, because of its special importance, and unless other significant material considerations indicate otherwise it will be necessary to refuse planning permission.

NRW Letter to LPAs Re: Ancient Woodland (December 2021)

2.2.5 Local Authorities in Wales were notified of the publication of Natural Resources Wales Web Page Advice: Development Management proposals and Ancient Woodlands - This is standing advice for development proposals that may impact (directly or indirectly) upon ancient woodland in Wales.

2.2.6 The two documents comprise:

1. Advice to planning authorities considering proposals affecting ancient woodland and
2. Advice to applicants 'How to avoid or reduce effects of a development on ancient woodland'.

2.3 Regional Context

Strategic Development Plan

2.3.1 The Planning (Wales) Act 2015 strengthens the plan-led approach in Wales by introducing a legal basis for the preparation of a National Development Framework (referred to now as Future Wales) and Strategic Development Plans (SDP). The Town and Country Planning (Strategic Development Plan) (Wales) Regulations published in March 2021 came into force in February 2022 and set out the procedure for preparing SDPs. The regulations also establish Corporate Joint Committees (CJCs) for each region, which will be responsible for preparing an SDP for the region.

2.3.2 During the process of preparing the Replacement LDP, the Local Planning Authority will closely consider the implications of the emerging SDP for the Powys LDP, whilst also looking at how the Replacement LDP's evidence can be used to inform the SDP.

Regional Planning Groups

2.3.3 Future Wales identifies Mid Wales as one of four regions within Wales. The Mid Wales region comprises of the Local Planning Authorities of Ceredigion and Powys and the majority of the Brecon Beacons National Park Authority area (lying within the Powys Unitary Authority area). Future Wales expects the planning authorities within the Mid Wales region to work together to plan for regional issues and in preparation of a Strategic Development Plan. The Planning Policy team will be continuing to support and contribute towards regional planning within the Mid Wales Strategic Planning Group, through attending regular regional meetings, sharing approaches towards evidence, and identifying opportunities for collaborative working.

Mid Wales Growth Deal

2.3.4 In October 2021, the Portfolio Business Case (and supporting documents), approved by the Growing Mid Wales Board, was formally submitted to the Welsh Government for consideration and review. This provides a framework for the Growth Deal and has been scoped from the eight broad strategic growth priority areas identified by the 'Vision for Growing Mid Wales' published by the Growing Mid Wales Partnership in May 2020. It identifies three projects in Powys – eco-training at the Centre for Alternative Technology, Elan Valley Lakes project and restoration of the Montgomery Canal. Other regional projects include improving digital connectivity and identifying areas to provide business/industrial units at regionally important strategic locations.

2.3.5 In January 2022, the Final Deal Agreement of the Mid Wales Growth Deal was signed by the Welsh Government, UK Government, Powys County Council and Ceredigion County Council. It marks the commitment of all partners to deliver the Mid Wales Growth Deal, a ground-breaking partnership bringing a combined investment of £110 million from UK and Welsh Government, which is expected to lever in significant additional investment from other public and private sources maximising the impact in the Mid Wales region.

2.3.6 The proposals set out to Government demonstrate the potential outcomes that are achievable in Mid Wales through Growth Deal investment:

1. To create between 1,100 and 1,400 new jobs in Mid Wales through the Growth Deal by 2032.
2. To support a net additional GVA uplift of between £570 million and £700 million for the Mid Wales Economy through the Growth Deal by 2032.
3. To deliver a total investment of up to £400 million in the Mid Wales Economy through the Growth Deal by 2032.

2.3.7 The progress of the Mid Wales Growth Deal and associated work will be taken into account in preparing the Replacement LDP.

Growing Mid Wales Partnership

2.3.8 Growing Mid Wales is a regional partnership that was established in 2015 to progress jobs, growth and the wider economy in Mid Wales. It comprises of representative bodies and key stakeholders from across the private, public and voluntary services across the region. The initiative seeks to represent the region's interest and priorities for improvement to the local economy.

2.3.9 The Growing Mid Wales Partnership commissioned economic consultants SQW to undertake a Mid Wales Applied Research and Innovation Study, which reported in June 2021. The report provided an evidence base and developed a vision for applied research and innovation in Mid Wales. It also commissioned consultants Radical Innovations Group to undertake a feasibility study exploring hydrogen potential for the region, which reported in October 2021. The project and report provided an evidence base for the development of hydrogen projects in the region and a Mid Wales Hydrogen Action Plan. The next steps will investigate how and where hydrogen or other low-carbon energy solutions may fit within the evolving energy system.

Mid and South-West Wales Regional Housing Market Assessment (2019, Adopted February 2022)

2.3.10 The Mid and South-West Wales Regional Housing Market Assessment undertaken by Opinion Research Services in 2019 was approved by Portfolio Holder Decision on the 14th of March 2022 and therefore has been adopted by Powys County Council as the Local Housing Market Assessment for the County of Powys. This assessment comprises of two reports relevant to the Powys LDP area. The first report, the 'Housing Market Evidence for Mid and South West Wales 2019', provides an assessment at the regional level. This is supplemented by a second report, the 'Summary of Local Housing Market for Powys 2019', which provides a sub-area analysis for Powys. A separate report was produced covering the area of the Brecon Beacons National Park Authority.

2.3.11 It is important to note that these documents were presented and approved as initial findings that would require updating to account for the 2018-based household projections. A planning position statement will be published alongside the Regional Housing Market Assessment explaining the position of the Local Planning Authority on the approved assessment and in order to clarify that it will not be used for planning policy and development management purposes. The local authority will, instead, be using the new approach published by Welsh Government (see paragraph 2.1.18) to undertake a new LHMA for Powys for the period 2022-2037, which will use the latest 2018-based household projections published by Welsh Government.

2.3.12 Whilst the new LHMA will provide a key piece of evidence for the Replacement LDP, Officers will also need to consider this evidence alongside other relevant evidence, such as the Council's Well-being Plan and evidence relating to viability and deliverability. The results from the Census 2021 will provide essential evidence going forward with statistical releases expected in 2022 and 2023.

Regional Viability Model

2.3.13 The high-level viability model (HLVM) produced in 2019 by Andrew Burrows of Burrows Hutchinson Ltd. for local authorities in Mid and South-west Wales has been revised in order to provide further options for determining affordable housing transfer values. This revision was required in response to the changes made by Welsh Government to Acceptable Cost Guidance. The Local Planning Authority continues to use the HLVM for annual monitoring purposes to assess changes to residual values (see monitoring indicator AMR9). The HLVM is intended to be used to assist with the viability testing of proposed policies and affordable housing targets of the Replacement LDP, as evidence to support its delivery.

2.3.14 The site-specific development viability model (DVM) has been used by some developers to assess the viability of Candidate Sites and planning applications. Planning

Policy Officers have reviewed the submitted models and have provided advice to Development Management Officers based on their findings.

2.3.15 It is expected that Powys will continue involvement in the Mid and South-west Wales regional planning group for viability purposes to support implementation of the regional viability model.

Regional Employment Study

2.3.16 The Regional Sites and Premises study consulted with public and private stakeholders and has delivered the first two reports of this employment-led analysis, which assesses net employment flows, vacancies and where there is demand. It has assessed existing employment sites identified in the adopted Powys, Ceredigion and the Brecon Beacons National; Park Authority LDPs and considered the opportunities to deliver these sites.

2.3.16 Within Powys, the two reports identified five sites where strategic interventions may be necessary to enable delivery, these being:

- Llanidloes Road, Newtown
- Offa's Dyke Business Park, Welshpool
- Gwernyfed, Three Cocks
- Abermule Business Park, Abermule
- Heart of Wales Business Park, Llandindod Wells

2.3.17 In addition, an important new opportunity was identified for a Mid Wales sustainable Technology Park, potentially in the Machynlleth area.

2.3.18 A further 12 sites were identified in Powys which should, as a minimum, be retained to meet local employment needs:

- Woodlands Business Park, Ystradgynlais
- Wyeside Enterprise Park, Llanelwedd, Builth Wells
- Broadaxe Business Park, Presteigne
- Great Oaks / Parc Derwen Fawr, Llanidloes
- Parc Hafren, Llanidloes
- Churchstoke
- Four Crosses
- Treowain Enterprise Park, Machynlleth
- Ddole Road Industrial Estate, Llandrindod Wells
- Brynberth Business Park, Rhayader
- Gypsy Castle Lane, Hay-on-Wye
- Buttington Quarry, Trewern

2.3.19 The study recognised that there were additional commercial pressures in other towns in Powys which would require further assessment to identify potential employment sites. With the approval of the Mid Wales Growth Deal on 13th January 2022, a dedicated officer will be appointed to lead on preparing the bids for inventions to enable sites and premises to be brought forward.

2.4 Local Context

The Next Powys Well-being Plan

2.4.1 The first Well-being Plan for Powys was published in May 2018 by the Public Service Board (PSB) for the Powys Local Authority Area, who is responsible for developing a local Well-being Assessment and Well-being Plan for the area. The Powys Public Service Board (PSB) Annual Reports highlight the work that the PSB has done to deliver the objectives in Towards 2040.

2.4.2 During this monitoring period, work has commenced on the next Well-being Plan for Powys. In June 2021, a ‘Living in Powys’ engagement exercise was launched to inform the next Well-being Plan for Powys. The data gathered from this survey and other data and engagement sources has helped to gain an understanding of people’s well-being needs across the county. In March 2022, the Public Service Board published a Well-being Assessment, which focuses on the general needs of the population under four key themes:

- Social
- Economy
- Environment
- Culture

2.4.3 The assessment will inform plans going forward. Its findings will be used to set well-being objectives, which will provide the framework for the next Well-being Plan, due to be published in May 2023. The Well-being Plan forms a key part of the evidence, shaping and influencing the vision, strategy and objectives of the Replacement LDP.

Vision 2025: Our Corporate Improvement Plan (April 2018, Refreshed April 2021 and March 2022)

2.4.4 Vision 2025 was refreshed in April 2021 as the Corporate Improvement Plan 2021-2025. A light review of Vision 2025 (2022-2025) was approved by Full Council in March 2022. The Council’s aspirations and objectives, as set out within this document or any subsequent new approved Corporate Plan, will be taken into account in preparing the Replacement LDP.

Housing Needs – Updated Gypsy and Traveller Accommodation Assessment

2.4.5 In March 2022 the Council formally approved the Gypsy and Traveller Accommodation Assessment (GTAA) 2021. The work was undertaken by ORS (Opinion Research Services) with the involvement of a stakeholder group. It was subsequently submitted to the Welsh Government for approval. The assessment identified need for new provision (assessed up to the end of the Replacement LDP period) in both Brecon (within the Brecon Beacons National Park Authority area) and Welshpool.

A Strategy for Climate Change – Net Positive Powys 2021-2030

2.4.6 The Strategy for Climate Change has set out a framework of actions to enable Powys County Council to meet the challenges of climate change. It sets the vision for where Powys County Council wants to be in 2030 and how it aims to achieve the goal of being net carbon zero by 2030. By achieving this goal, Powys County Council will contribute to:

- Tackling the climate emergency,

- Cutting emissions by at least 95% in Wales by 2050,
- Making the public sector in Wales net carbon zero by as outlined in Welsh Governments Prosperity for All: A Low Carbon Wales delivery plan.

Powys Nature Recovery Action Plan (March 2022)

2.4.7 The Powys Nature Recovery Action Plan (PNRAP), adopted by the Council in March 2022, is a 10-year aspirational plan that will assist the Council to deliver its obligations under the Environment (Wales) Act 2016 and Wellbeing of Future Generations (Wales) Act 2015. It builds on the Powys Local Biodiversity Action Plan, updating actions to reflect the current situation. It is primarily intended to guide the work of the Powys Nature Partnership, a group of organisations and individuals committed to reversing the declines in biodiversity across Powys, which includes Powys County Council. It should be noted that Brecon Beacons National Park Authority has its own Local Nature Partnership and Nature Recovery Action Plan.

2.4.8 The PNRAP focuses on developing resilient ecological networks (also known as nature recovery networks) and takes an ecosystem approach, meaning that it is designed to deliver biodiversity action at a larger scale than a single species or habitat and takes account of the needs of people at the same time. Progress towards the delivery of the plan will be monitored through an annual high-level report by the Partnership.

Local Council Elections (May 2022)

2.4.9 The Local Council Elections took place in May 2022, following a pre-election period (purdah) which began on 14th March 2022 and restricted certain Council business. Although it is recognised that the elections fall outside the period of this Annual Monitoring Report, it is worth noting that the results of the elections will affect subsequent iterations of the local Council documents listed above and corporate priorities.

2.4.10 The elections saw a change in the composition of the cabinet from Independent and Conservative party members to members of the Liberal Democrat and Labour parties. The Liberal Democrat and Labour administration have drawn up a progressive partnership agreement, which they have cited will provide “a firm foundation that builds a stronger, fairer and greener future for Powys”.

Water Quality in Riverine Special Areas of Conservation (SACs)

2.4.11 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.

2.4.12 As a consequence, NRW issued Interim Planning Advice in December 2020 which required new development within SAC catchments to achieve phosphate neutrality or betterment. This has the potential to constrain development to only those able to connect to wastewater treatment works with phosphate stripping equipment installed and furthermore will limit the number and location of private systems. The Usk and Wye catchments cover almost the entirety of the southern half of Powys and thus it is likely this new environmental

constraint will impact on development coming forward, but the consequences are not yet fully evident in the data in this monitoring period.

2.4.13 This Planning Advice was further updated on 26 May 2021 with additional information on the HRA screening process, the requirement to confirm the phosphorus discharge limits for wastewater treatment works and the need for proposals which benefit from permitted development rights to secure prior approval if phosphorus discharges were to be increased within a riverine SAC catchment.

2.4.14 The impact of phosphates in River SAC catchments is beginning to affect decision-making on some residential and tourism development that involve overnight stays. These developments have the potential to increase phosphorus discharges and are being delayed whilst solutions are sought. Exceptions are where new (usually infill) development has combined and replaced existing septic tank systems in a modern package treatment works and has thus been able to demonstrate betterment.

2.4.15 As the evidence base and knowledge increases, it is anticipated further advice and guidance will be issued by NRW which will increase understanding of surface and sub-surface pathways, the hydrogeological regime and impact on the management of public and private system sewage sludges. It remains the case that this constraint will also be a significant consideration in the preparation of the Replacement LDP which may influence the Strategy of any new Plan.

Covid-19 Pandemic

2.4.16 Whilst there have been no UK-wide or Wales specific lockdowns between 1st April 2021 and 31st March 2022, some restrictions remained in place throughout this period in Wales in relation to group sizes, self-isolation and wearing facemasks in public transport. Limits on holidaying within the UK were lifted on 12th April 2021, outdoor event number restrictions in Wales were lifted on 7th August 2021 but there were restrictions on the indoor meeting of groups (such as in pubs) until 28th January 2022, when Wales moved to Alert Level Zero. However, all businesses were able to be open during this period.

2.4.17 It is anticipated that the final legal restrictions, those of wearing facemasks in a healthcare setting, will be revoked in late May 2022, 26 months after the first UK-wide lockdown which began on 23rd March 2020.

Cost of Living

2.4.18 The “cost of living crisis” refers to the fall in disposable incomes that began in late 2021 caused by increasing inflation which outstripped wage and benefit increases. This was greatly exacerbated following 24th February 2022 when the Russian Federation invaded Ukraine in a major escalation in a conflict which had begun in 2014. Sanctions were applied on Russian products by the UK, EU and other western nations, including on the purchase of Russian energy products. Ukraine is a major exporter of wheat, sunflower oil and other agricultural products and the global loss of these products created further inflationary pressures.

2.4.19 On 1st April 2022 (outside the scope of this AMR), there was a 54% (£693) increase in the energy price cap. To April 2022, there had been a 9.1% increase in the cost of living based on the Consumer Price Index (CPI), one measure of inflation. It is anticipated that inflation will exceed 10% later in 2022.

3. Contextual Indicators

3.1.1 Welsh Government guidance contained within the Development Plans Manual (Edition 3) states that contextual indicators should be “defined by each LPA and involve the consideration of influences at a strategic level to describe the economic, social and environmental conditions within which the development plan operates”.

3.1.2 The contextual indicators listed below did not form part of the Annual Monitoring Framework included within the adopted Powys LDP. They have been included in this AMR to meet the requirements of the Development Plans Manual (Edition 3) and to give an overview of factors that may influence the performance of the Powys LDP or be a wider reflection on the implementation of the strategy. Environmental indicators have not been included in this section as the section detailing the results of the SA indicators contains a wide range of contextual data relating to the environment.

Contextual Indicator 1: The number and percentage of people in Powys by their economic activity. Either unemployed, economically inactive or economically active.

Objective:	Vibrant Economy
Indicator:	The number and percentage of people in Powys by their economic activity. Either unemployed, economically inactive or economically active.
Key Policies:	Strategic Policy SP2 – Employment Growth
Related Policies:	N/A
Target:	No increase in the percentage of working aged people in Powys who are unemployed.
Trigger Point:	The percentage of the working age population in Powys who are unemployed increases for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This contextual indicator puts into context the employment strategy of the LDP. During the preparation of the LDP, the evidence base did not identify a strong relationship between population growth and an employment land requirement. Instead, it was recommended provision be made for businesses to be able to upgrade and replace premises. To meet this need, the LDP allocated 45 hectares of employment land.

Table 5 shows that the working age population of Powys is reducing year on year, this is consistent with the evidence used to inform the employment strategy at the LDP preparation stage. Please note that the data source informing Table 5 has changed from that used in AMR 2022, these changes have been made to reflect the changes made to the Council's Wellbeing Information Bank.

The latest available information (December 2021) shows that employment levels and the proportion of the working aged population that are economically inactive continues to fall. The data collected for the years 2020 and 2021 will have been influenced by the Covid 19 pandemic. Any rise in unemployment levels due to the Covid 19 pandemic will be a consequence of wider economic reasons and not reflect the performance of the Powys LDP. However, the planning system including the Powys LDP needs to be able to support an economic recovery including new businesses and new ways of working. Further factors that may influence unemployment levels are the Mid Wales Growth Deal and Brexit.

Research will be undertaken as evidence to support the preparation of the replacement LDP, this will include reconsidering targets and the spatial strategy with regards to employment development. The research will take into consideration factors such as the working age population in Powys, unemployment levels and the Growth Deal.

Table 5. The Number and Percentage of People in Powys by their Economic Activity either Unemployed, Economically Inactive or Economically Active (including BBNP).

Date - 31st December Each Year	Working Age Population (Aged 16-64)	Economically Active	Economically Inactive	Unemployed	Percentage Unemployed
2021	72,500	57,700	14,800	2,800	3.9%
2020	73, 400	58,300	15,100	3,000	4.1%
2019	73,600	57,700	15,800	1,800	2.4%
2018	74,100	59,000	15,100	1,300	1.8%
2017	75,000	61,500	13,500	1,500	2%

Source: [Wellbeing Information Bank: View information about Employment workforce - Powys County Council](#)

Action

Continue monitoring.

Contextual Indicator 2: The number of recorded homelessness cases in Powys.

Objective:	Meeting Future Needs
Indicator:	The number of recorded homelessness cases in Powys.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	Strategic Policy SP1 – Housing Growth
Target:	No increase in the number of recorded homelessness cases in Powys.
Trigger Point:	The number of recorded homelessness cases in Powys increases for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This contextual indicator puts into context the Housing Strategy of the LDP, which is to provide 4,500 additional dwellings, of which 952 are affordable over the lifetime of the plan. The reasons for homelessness are outside the remit of the plan, these include the breakdown of relationships, parents no longer willing or able to accommodate grown up children or the loss of rented or tied accommodation. However, an increase in homelessness can be seen as an indicator of housing need, a consistent increase may indicate that housing need outweighs the supply of dwellings (particularly affordable) being delivered through the LDP.

Table 6 shows the number of cases of homelessness recorded during the monitoring period. The data shows a year-on-year increase. In 2020 -2021, this was likely to be due to the Covid 19 pandemic which has resulted in job losses, reduced incomes and increased pressure on relationships during lockdowns. By April 2022, it has been recognised that there is a cost-of-living crisis where inflation and the cost of living is increasing at a pace much faster than annual incomes, this is discussed in Contextual Indicator 3. The number of homelessness cases is also influenced by the rapid increase in house prices locally.

Registered Social Landlords (RSL) and the Strategic Housing Authority (SHA) are working with the Welsh Government to address homelessness. This includes a programme of new build social housing schemes which are at various stages between early discussions, planning applications submitted, under construction and completed sites. The programme itself resulted in an additional 89 affordable dwellings during the monitoring period.

The increase in the number of cases of homelessness will need to be taken into consideration when determining the dwelling requirement and affordable housing target for the Replacement LDP. This will include further investigation and research into how homelessness cases translate into additional affordable homes required, where the need is within the Plan area and the type of properties required. The evidence base to support the Replacement LDP will also consider whether there are adequate employment opportunities within communities.

Table 6. Number of Homelessness Cases in Powys (including BBNP)

Year (1st April to 31st March)	Number of Cases
2019 - 2020	607
2020 - 2021	714
2021 - 2022	831

Source: Powys County Council

Action

Further Investigation/Research Required

Contextual Indicator 3: Average house price in comparison to average income in Powys

Objective:	Meeting Future Needs
Indicator:	Average house price in comparison to average income in Powys
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	Strategic Policy SP3 – Affordable Housing Target
Target:	For any increase in the average house price to be proportionate to an increase in average income.
Trigger Point:	Increase in average house prices not proportionate to increase in average income for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This contextual indicator looks at the data regarding house price data versus wages. A consistent increase in house prices that is not reflected in increases in wages would impact on affordability and may mean that the proportion of people unable to buy their own home is on the increase.

The indicator looks at annual average house prices using data taken from the Land Registry House Price Index. The data is for all property types including new build and existing properties for the Powys County Council area including house prices in the Brecon Beacons National Park (BBNP). Detailed house price data within the Land Registry's Price Paid Data is used to inform viability monitoring as part of monitoring indicator AMR9.

Table 7 shows that average houses prices in Powys have, again, substantially increased by £31,386, representing almost a 15% increase during this monitoring period. This represents the highest annual increase in average house prices for Powys since LDP adoption. The Land Registry's House Price Index (March 2022) shows the average house price for Powys (£243,443) is amongst the highest in Wales, following Monmouthshire (£342,225), the Vale of Glamorgan (£313,180) and Cardiff (£248,958).

The volume of monthly sales in Powys has decreased from a high point of 292 in June 2021 to only 70 by January 2022. The short-term removal of the need to pay Land Transaction Tax on properties up to the value of £250,000 came to an end in Wales in June 2021, which has clearly impacted on the volume of sales occurring since. Despite this, the average house prices in Powys have continued on an upward trend, which suggests that demand continues to be strong. However, the current economic uncertainty, cost of living crisis, and affordability constraints are likely to impact on house price trends going forward into the next monitoring period.

With regards to income data, the Office of National Statistics (ONS) carries out an Annual Survey of Hours and Earnings, the data from which is available at local authority level in Wales through Stats Wales. Table 7 shows that average weekly earnings have increased by a slightly higher rate than the previous year.

The results for this contextual indicator demonstrate that average house prices in Powys are increasing at a higher rate than average income, and therefore continue to be disproportionate to each other. The housing affordability gap in Powys, therefore, continues to widen. The impact of these changes on affordability will also depend on factors around mortgage availability, including loan to value ratios and deposit levels.

The Council also now has access to CACI Paycheck Household Income data, which gives an average household income in Powys of £33,348. Average household incomes vary across the County with the highest levels of household income generally found in the north-east and southern parts of the County (including areas within the Brecon Beacons National Park) and the lowest levels of household income generally found across central and north-western areas of Powys, along with the Ystradgynlais area.

It is intended to use CACI Paycheck household income data for the purpose of monitoring this indicator in future years, rather than the ONS weekly earnings data, as it relates more directly to household income and, therefore, affordability. CACI Paycheck household income data will also be used as part of the Local Housing Market Assessment process.

The impact of changes in house prices in relation to household incomes and on affordability levels will be considered and assessed as part of the Replacement LDP process. The new Local Housing Market Assessment 2022, which will be based on Welsh Government's new methodology and guidance, will take into account house price and household income data. The results of this assessment will provide evidence of housing need across the Powys LDP area and locally at a Housing Market Area level, which will be used to inform the Replacement LDP's strategy and affordable housing policies.

Table 7. Annual Average House Prices taken from the Land Registry House Price Index figure for Powys (including BBNP)

Date	Average House Price	Percentage increase from previous year	Average weekly earnings (per head)	Percentage increase from previous year
April 2018 (at LDP adoption)	£179,837	N/A	£464.40	N/A
March 2019	£185,306	3.2%	£477.80	2.9%
March 2020	£188,728	1.8%	£507.70	6.3%
March 2021	£212,057	12.3%	£540.20	6.4%
March 2022	£243,443	14.8%	£576.30	6.7%

Source: Land Registry House Price Index <https://landregistry.data.gov.uk>

Stats Wales - average median gross weekly earnings by Welsh local areas and year (last updated November 2021) <https://statswales.gov.wales/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Earnings>

Action

Further Investigation/Research Required

4. Analysis of Core / Key Indicators

4.1.1 Core / Key Indicators are identified in the Development Plans Manual published by Welsh Government.

4.1.2 Unless stated otherwise only Full and Outline planning applications permitted have been considered to prevent any double counting.

Theme 1 – Planning for Growth in Sustainable Places

Objective 1 – Meeting Future Needs

To meet the needs arising in Powys over the plan period up to 2026, to provide adequate, appropriately located land for:

- i. 5,588 dwellings to deliver a dwelling requirement of 4,500 which will meet all the housing needs of Powys’ increasing and ageing population and its decreasing size of households, including open market and affordable housing, gypsy and traveller accommodation and other specialist housing needs.
- ii. 45 hectares of employment and economic development uses.
- iii. Retail, tourism, recreation, infrastructure, services and other needs.

Objective 1 Core Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR1	Housing land supply (in years) (per reporting period and since LDP adoption) and according to the latest Joint Housing Land Availability Study	N/A	N/A
AMR2a	The annual level of housing completions monitored against the Average Annual Requirement. (AAR)		To be Reconsidered in Replacement LDP
AMR2b	Total cumulative completions monitored against the anticipated cumulative completion rate.		To be Reconsidered in Replacement LDP
AMR3	The number of net additional affordable homes built in the LPA area.		Continue Monitoring
AMR3b	Affordable Housing by Tenure – New		Continue Monitoring
AMR7	Average % of affordable housing secured as a proportion of total number of housing units permitted on private developments of 5 or more units in each sub-market area.		Continue Monitoring
AMR9	Changes in residual values (housing development viability) across the 4 sub-market areas, set against the residual values applied in the Viability Assessment Update (August 2016).		Further Investigation/Research Required
AMR14	No. of gypsy traveller sites and no. of pitches granted planning permission and delivered.	Monitoring completed 2021	No further monitoring required.
AMR15	Amount of employment land (hectares) permitted on allocated sites in the Development Plan as a % of all employment allocations.		Further Investigation/Research Required

AMR1: Housing land supply (in years) (per reporting period and since LDP adoption) and according to the latest Joint Housing Land Availability Study

Objective:	Meeting Future Needs
Indicator:	Housing land supply (in years) (per reporting period and since LDP adoption) and according to the latest Joint Housing Land Availability Study
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	N/A
Target:	Maintain a minimum 5-year supply of land for housing (as required by TAN1).
Trigger Point:	JHLAS Study records a housing land supply of less than 5 years in any one year following adoption of the Plan

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This is no longer a core indicator. The need to demonstrate at least a 5 year supply of housing land has been replaced by monitoring against the Housing Trajectory. See AMR2b.

Action

N/A

AMR2a. Number of net additional dwellings (general market and affordable) built in the LPA area (per reporting period and since LDP adoption).

Due to the publication of Development Plans Manual Edition 3 (March 2020) AMR2 has been revised and split between AMR2a and AMR2b.

Objective:	Meeting Future Needs
Indicator:	AMR2a. The annual level of housing completions monitored against the Average Annual Requirement. (AAR)
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	N/A
Target:	To provide 4,500 (average 300 per annum) net additional dwellings over the Plan period 2011-2026.
Trigger Point:	The number of annual net additional dwellings completed falls below the Average Annual Requirement (for two consecutive years).

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator relates to the Growth Strategy of the LDP which included a dwelling requirement figure of 4,500 new dwellings. For the LDP to provide 4,500 dwellings over the 15-year period (2011 to 2026), the annual average net number of dwellings to be completed each year equates to 300 units.

During the monitoring period (1st April 2021 to 31st March 2022) a total of 369 dwellings were completed. As shown in the table below, this figure is an improvement on previous years and above the original 300 dwellings annual average dwelling requirement figure.

From the start of the plan period 1st April 2011 to the 1st of April 2015 base date when the housing provision components were calculated, 622 units residential units had been completed. This is below the 1,200 units required over the four-year period giving a shortfall of 578 units.

To account for the shortfall the Annual Average Requirement (AAR) figure should be adjusted to 352.5 dwellings a year (rounded to 353 dwellings), as per the examples shown in paragraph 8.16 of the Development Plans Manual (Edition 3). This is reflected in Table 8, Table 9 (21A) and Figure 1 the housing trajectory below.

The number of additional dwellings completed between 1st April 2021 and 31st March 2022 is above the AAR as set out in the plan (300 units), and for the first time since the start of the plan period it is also above the adjusted AAR (353 units), which takes into account the shortfall accrued in the early years of the plan.

However, seven years have passed since the housing provision base date of April 2015 within the seven-year period there are three periods where the annual completion figure was less than the AAR for more than two consecutive years. This means the trigger point

has been reached and that the objective of delivering 4,500 dwellings before the end of the plan-period is unlikely to be met. The housing component of the strategy will therefore need to be reassessed during the preparation of the Replacement LDP.

Consideration is given to the cumulative requirement against cumulative completions in monitoring indicator AMR 2b.

Table 8. Annual Net Housing Completions against the Annual Average Requirement (AAR) Figure

Year	Completions	Against AAR (300 units)	Percentage	Against AAR (353 units)	Percentage
2011 - 2015	622	- 578	- 48%	N/A	N/A
2015 - 2016	316	+16	+ 5%	- 38	- 10%
2016 - 2017	253	- 47	-16%	- 93	- 28%
2017 - 2018	195	- 105	- 35%	- 167	- 45%
2018 - 2019	163	- 137	- 46%	- 208	- 54%
2019 - 2020	237	- 63	- 21%	- 123	- 33%
2020 – 2021	315	+15	+ 5%	- 38	- 11%
2021 – 2022	369	+ 69	+ 23%	+ 16	+ 5%

Action

To be Reconsidered in Replacement LDP.

The plan's strategy is not being delivered.

The Development Plans Manual (Edition 3) Welsh Government guidance requires LPA's to include a Table (21A) and a trajectory to reflect the actual annual completions compared against the Annual Average Requirement and for it to be presented as follows.

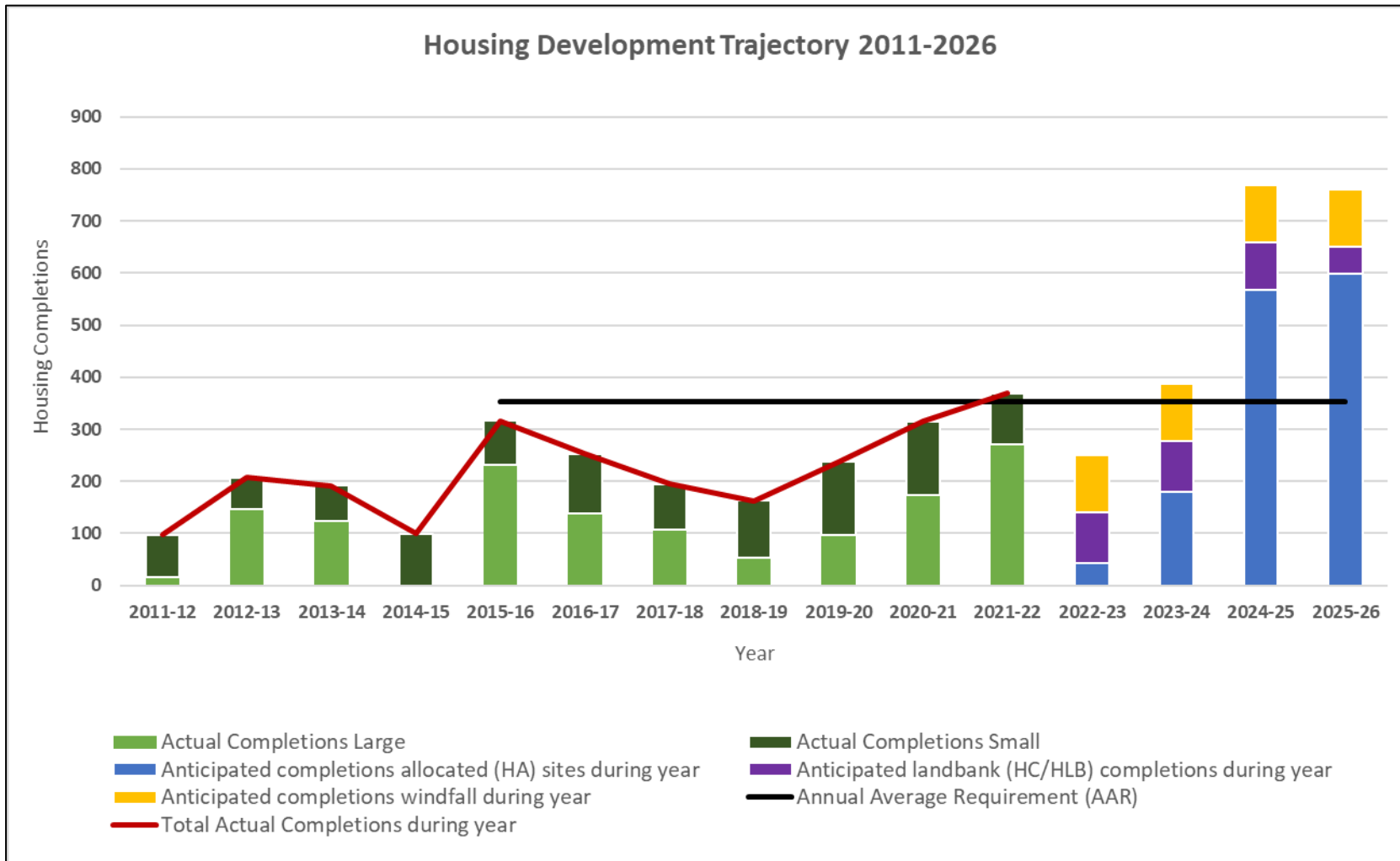
Table 9. (21A) Housing Trajectory at 1st April 2022

LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	-12	-13	-14	-15	-16	-17	-18	-19	-20	-21	-22	-23	-24	-25	-26
Actual Completions Large	15	147	123	0	231	139	107	53	96	173	271				
Actual Completions Small	82	60	69	99	85	114	88	110	141	142	98				
Anticipated completions allocated (HA) sites during year															
Anticipated landbank (HC/HLB) completions during year															
Anticipated completions windfall during year												110	110	110	110
Total Actual Completions during year	97	207	192	99	316	253	195	163	237	315	369				
Annual Average Requirement (AAR)					353	353	353	353	353	353	353	353	353	353	353
Total anticipated completions:															

*Note the total completion figure for years 1-4 differs slightly to the 622 published in Table H2 of the LDP, due to changes in monitoring systems which includes the change from monitoring 1st Jan - 31st Dec to 1st April – 31st March.

**Annual Average Requirement in the LDP is 300 units however this has had to be amended to take into consideration the units completed prior to the base date of the plan (April 2015) when the housing provision was calculated.

Figure 1. Housing Development Trajectory 2011 – 2026 on 1st April 2022



AMR2b. Number of net additional dwellings (general market and affordable) built in the LPA area (per reporting period and since LDP adoption).

Due to the publication of Development Plans Manual Edition 3 (March 2020) AMR2 has been revised and split between AMR2a and AMR2b.

Objective:	Meeting Future Needs
Indicator:	AMR2b. The annual level of housing completions monitored against the cumulative Average Annual Requirement. (AAR)
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	N/A
Target:	To provide 4,500 (average 300 per annum) net additional dwellings over the Plan period 2011-2026. Annual net additional dwelling requirement for remainder of the Plan period: 2015-2016: 322 2016-2017: 321 2017-2018: 325 2018-2019: 357 2019-2020: 356 2020-2021: 356 2021-2022: 377 2022-2023: 354 2023-2024: 367 2024-2025: 361 2025-2026: 352
Trigger Point:	The number of annual net additional dwellings completed falls below the cumulative dwelling requirement (identified in the target as the annual net additional dwelling requirement for the remainder of the Plan) for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator relates to the growth strategy of the LDP which included a dwelling requirement figure of 4,500 new dwellings. The LDP housing provision components were calculated at the base date of 1st April 2015, at this time, 622 dwellings had been completed since the beginning of the Plan period. A further 3,878 dwellings are therefore required to be built before the end of the Plan period (between 2015 and 2026) in order to meet the LDP's dwelling requirement.

Within the Plan area a total of **369 dwellings were completed** during the monitoring period. See Table 10.

The 369 dwellings together with the completion of 1,479 dwellings recorded during the six previous years, means that a **total of 1,848 completions** have been recorded since the 1st April 2015 housing provision base date.

The figure of 369 residential completions recorded is lower than the LDP AMR net additional dwelling requirement for the same period which is 377 units. The cumulative total of the net additional dwelling requirement figures identified in monitoring indicator AMR2, for the period April 2015 up to 31st March 2022 is 2,414 units. By comparing the 1,848 completions against the 2,414 net additional dwelling requirement figure it can be seen that there has been a shortfall of 566 completions over the seven-year period.

The number of dwellings completed this year is an increase of 54 dwellings from last year's figure. Figure 2 shows that housing completions are an improving picture. However, the trigger point for this indicator has been reached with the number of annual net additional dwellings completed being below the cumulative dwelling requirement consistently since the 1st April 2015 housing provision base date.

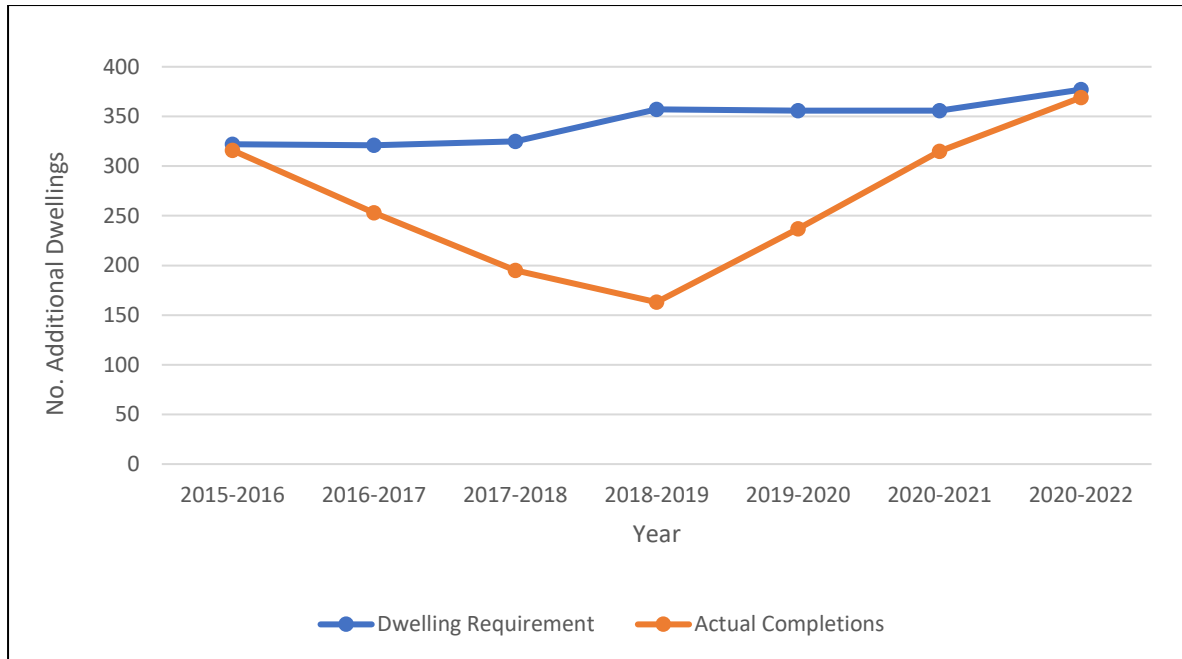
When adding the 1,848 dwellings delivered in the period between 2015 and 2022, to the 622 dwellings completed between 2011 and 2015 a total of 2,470 units have been delivered (55% of the target). With only four years of the Plan period remaining, it means that the objective of delivering 4,500 dwellings before the end of the plan-period is unlikely to be met.

The housing component of the LDP strategy will be reconsidered, taking into account the latest population projections, build rates and evidence of need detailed in a Local Housing Market Assessment (LHMA), as part of the process of preparing a Replacement LDP.

Table 10. Actual Cumulative Completions against the Cumulative Completions Target

Year	Cumulative Target	Actual Cumulative Completions	Cumulative Completions Against Target	Percentage
2015 - 2016	322	316	- 7	- 2%
2016 - 2017	643	569	- 74	- 12%
2017 - 2018	968	764	- 204	- 21%
2018 - 2019	1,325	927	- 398	- 30%
2019 - 2020	1,681	1,164	- 517	- 31%
2020 - 2021	2,037	1,479	- 558	- 27%
2021 - 2022	2,414	1,848	- 566	- 23%

Figure 2. Chart Showing the Number of Additional Dwellings since Housing Provision Base Date of April 2015 against the Net Additional Dwelling Requirement



Action

To be Reconsidered in Replacement LDP.

The plan's strategy is not being delivered.

AMR3: The number of net additional affordable homes built in the LPA area.

Objective:	Meeting Future Needs
Indicator:	The number of net additional affordable homes built in the LPA area.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	N/A
Target:	<p>To provide 952 (average 63 per annum) net additional affordable homes over the Plan period (2011-2026).</p> <p>Annual net additional affordable housing target for the remainder of the Plan period (2015-2026):</p> <p>2015-2016: 90 2016-2017: 89 2017-2018: 69 2018-2019: 72 2019-2020: 69 2020-2021: 68 2021-2022: 60 2022-2023: 54 2023-2024: 66 2024-2025: 71 2025-2026: 67</p>
Trigger Point:	The number of net additional affordable homes completed falls below the cumulative target (identified in the target as the annual net additional affordable housing target for the remainder of the Plan) for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The LDP housing provision components were calculated at the base date of 1st April 2015, at this time, 186 affordable homes had been completed since the beginning of the Plan period. Between April 2015 and the end of the Plan period (end of March 2026) a further 766 affordable homes are required to be built in order to meet the LDP's target of delivering 952 affordable homes. From the 952 affordable homes, a total of 659 units are expected to be delivered on the LDP's housing allocations, with a further 107 units expected to come forward on windfall sites.

The Annual Monitoring Framework sets an annual affordable housing target for the remaining years of the Plan period. The rates of affordable housing delivery against the annual and cumulative targets are summarised in Table 11 below. The affordable housing delivery rates compared to the annual targets are also illustrated in Figure 3.

The 105 affordable dwellings completed during this monitoring period together with the completion rate of 417 dwellings recorded during the five previous years, means that a **total of 522 completions** have been recorded since the 1st April 2015 housing provision base date.

The 522 affordable housing completions exceed the cumulative target of 517 units set to be completed by April 2022. This means that the LDP is on track to delivering the additional affordable homes in line with the LDPs affordable housing target.

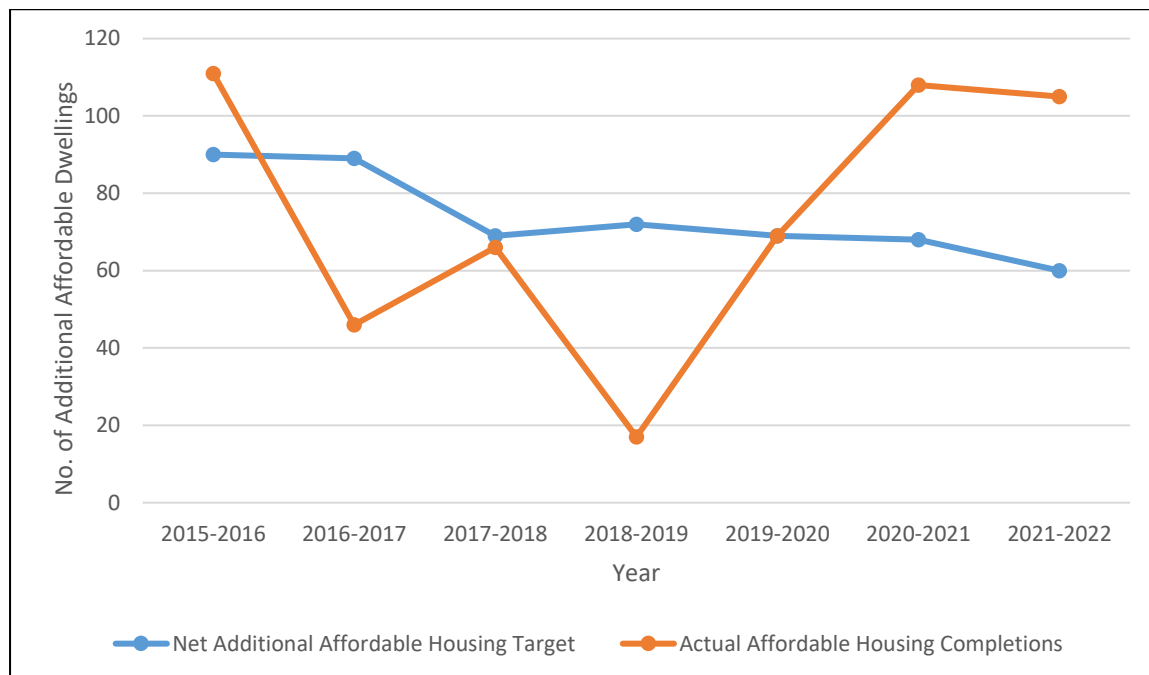
Figure 3 also shows that the number of affordable dwellings completed each year varies considerably. This is partially because it has been heavily influenced by the number of affordable dwellings being delivered through the Local Housing Association's, and the Council's housing building, programmes. Of the 105 affordable dwellings completed, 89 were built by Housing Associations.

The number of affordable homes being completed each year is anticipated to continue to deliver against the LDP Affordable Housing targets. The Local Housing Association's, and the Council's house building, programmes have a substantial number of projects that are underway that will ensure a sustained increased in the number of affordable homes delivered over the next few years.

Table 11. Actual Cumulative Affordable Dwelling Completions against the Cumulative Completions Target

Monitoring period	Annual target	Actual affordable housing units delivered	Cumulative target	Cumulative completions	Cumulative delivery against target
2015 – 2016	90	111	90	111	+21
2016 – 2017	89	46	179	157	-22
2017 – 2018	69	66	248	223	-25
2018 – 2019	72	17	320	240	-80
2019 – 2020	69	69	389	309	-80
2020 - 2021	68	108	457	417	-40
2021 - 2022	60	105	517	522	+5

Figure 3. Chart Showing Affordable Housing Delivery Rates Compared to the Annual Targets.



Action

Continue monitoring.

Development plan policies are being implemented effectively.

AMR3b: Affordable Housing by Tenure.

Objective:	Meeting Future Needs
Indicator:	Affordable Housing by Tenure.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	
Target:	For the average tenure mix of affordable housing completed to align with evidence of need within the Local Housing Market Assessment. <ul style="list-style-type: none"> • Social rented – 75%. • Intermediate rented housing – 25% Or revised percentages within any updated LHMA.
Trigger Point:	The average tenure mix of affordable housing completions does not accord with the evidence of need identified in the LHMA for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the tenure of affordable housing completions. It is designed to test the tenure split between social rented and intermediate affordable housing and alignment with the need identified within the Local Housing Market Assessment (LHMA). The Powys LHMA (2016) identifies the affordable housing need based on a tenure split of 75% social rented and 25% intermediate.

The results of this monitoring are summarised in Table 12. The results show that the majority of affordable housing completions are of a social rented tenure, with only a small percentage of intermediate housing completions. This tenure split is in line with the evidence within the Local Housing Market Assessment (2016).

It is noted that the tenure for a tenth of the completions is not specified. This includes affordable dwellings on exception sites that appear to have been granted subject to Section 106 agreement where there would be flexibility around the tenure of affordable housing, and therefore they may be intermediate rent or intermediate sale.

In future, this indicator will be monitored against the tenure split identified by the new Local Housing Market Assessment 2022, which is due to be undertaken during the next monitoring period.

Table 12. Number of Affordable Housing Completions by Tenure

Tenure	Number of units	% of overall units
Social rented	89	85%
Intermediate rented	0	0%
Intermediate for sale	5	5%
Not specified	11	10%

Action

Continue monitoring.

Development plan policies are being implemented effectively.

AMR7: Average % of affordable housing secured as a proportion of total number of housing units permitted on private developments of 5 or more units in each sub-market area.

Objective:	Meeting Future Needs
Indicator:	Average % of affordable housing secured as a proportion of total number of housing units permitted on private developments of 5 or more units in each sub-market area.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	Topic Based Policy H5 – Affordable Housing Contributions
Target:	% of affordable housing as a proportion of all housing units secured annually on private developments of 5 or more units to be in accordance with sub-market targets as follows: 30% Central Powys 20% Severn Valley 10% North Powys 0% South West Powys.
Trigger Point:	% of affordable housing secured as a proportion of total housing units permitted on private developments of 5 or more units within any sub-market area falls below the target contributions set out in Policy H5 for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator sets out the policy targets for affordable housing contributions to be secured across the four different sub-market areas, based on the targets set out in LDP Policy H5. The monitoring target requires a calculation of the average contribution secured for each sub-market area.

Three market housing developments have been approved under LDP Policy H5 during this monitoring period, all three of which have been located within the Severn Valley sub-market area. A contribution of 20% towards affordable housing has been secured by condition on these permissions, which will involve a total of nine affordable housing units.

No market housing developments were permitted in the Central Powys or North Powys sub-market areas where LDP Policy H5 applied during this monitoring period.

It should be noted that a market housing development was approved in the South West Powys sub-market area, which included four affordable housing units, however they were proposed in order to enable market housing to be developed on an extension to the site in an area that fell outside the development boundary. Market housing developments in the South West Powys sub-market area are not normally expected to contribute towards affordable housing under LDP Policy H5.

The results for this monitoring indicator are positive in that they show that affordable housing contributions are being negotiated in line with policy targets at the time of the original planning permission. However, it should be noted that applications have been made to remove/vary conditions/obligations, where affordable housing contributions have been re-negotiated on viability grounds, during this monitoring period. These cases are captured under monitoring indicator AMR8.

Table 13. Average Affordable Housing Contributions Secured Against the Target Contribution for The Sub-Market Area During the Monitoring Period.

Sub-market area	Target contribution	Average contribution
Central	30%	N/A
Severn Valley	20%	20%
North Powys	10%	N/A
South West Powys	0%	N/A

Action

Continue monitoring.

Development plan policies are being implemented effectively.

AMR9: Changes in residual values (housing development viability) across the 4 sub-market areas, set against the residual values applied in the Viability Assessment Update (August 2016).

Objective:	Meeting Future Needs
Indicator:	Changes in residual values (housing development viability) across the 4 sub-market areas, set against the residual values applied in the Viability Assessment Update (August 2016).
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	Topic Based Policy H5 – Affordable Housing Contributions
Target:	To keep the viability of affordable housing delivery under review to enable the maximum level to be achieved and to reflect changes in viability.
Trigger Point:	Change in residual values of 5% or more from the residual values in the Viability Assessment Update (August 2015) or from residual values in any future update in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The LDP's Viability Assessment Update (July 2016) assessed the economic viability of market housing development sites, and in particular, looked at the contribution that developers could make towards the provision of affordable housing in the four sub-market areas. This evidence informed the affordable housing targets set out in LDP Policy H5.

The purpose of this monitoring indicator is to keep the viability of delivering the affordable housing targets under review by identifying any significant changes in residual values that may impact on the policy targets. A positive change in residual values may indicate that schemes may have become more viable and, therefore, able to make a greater contribution towards affordable housing. Whilst a negative change in residual values may indicate that schemes have become less viable and, therefore, that the policy targets may no longer be realistic. A change of 5% in residual values either way will trigger the need for action.

The LDP's Viability Assessment (July 2016) was undertaken by the District Valuers Services (DVS) on behalf of the Council using an industry standard Argus model. Officers started to use the high-level viability model (HLVM) developed as part of the regional viability work for planning policy purposes during the previous monitoring period for AMR 2021. It is now being used for the second year for monitoring purposes, which means that it is possible to identify changes in the viability of development compared to the results for AMR 2021.

Data available from the Land Registry's House Price Index indicates that average new-build sales values in Powys have continued to increase during this monitoring period by a approximately 15% - see results for Contextual Indicator 3. These figures reflect the

significant increase in sale values across the residential property market generally, including re-sale values of existing properties.

As part of the assessment, Price Paid Data for new-build properties has been obtained from the Land Registry, along with floorspace data available from the online Energy Performance Certificate (EPC) register to establish average sales values (£ per sqm) achieved on recent housing developments within each sub-market area. Due to delays with the Land Registry, the data available on the price paid for new build properties is limited for this monitoring period, however this has been supplemented by data on re-sales of existing housing on recently built developments.

For the South-West Powys sub-market area, Officers continue to use re-sales data from the Golwg y Mynydd development at Godre'r Graig, as a recently built development in an adjacent area (Neath Port Talbot Borough Council) to act as a comparable in the absence of new-build data within this sub-market area. Recent re-sales values for properties on this development indicate that stronger house price values are being achieved for relatively new developments within this adjacent area, compared to re-sale of existing housing within the South-West area.

The house price data available indicates that values achieved (based on £ per sqm) vary considerably between developments, including those within the same sub-market areas. Further research and investigation around house prices at local level will be needed to inform decisions around defining sub-market areas as part of the Replacement LDP process. Consideration will also need to be given to aligning the viability sub-market areas with areas used for other parts of the evidence base for the Replacement LDP, including the Housing Market Areas used within the Local Housing Market Assessment and the settlement strategy.

Changes in build costs have been taken into account in the viability testing. An annual increase of 5% has been reported by the Tender Price Index published by the Build Cost Information Service (February 2022). The build costs used within the assessment have also been informed by build costs put forward by developers as part of viability challenges at planning application stage. The recent increase in energy costs and continued economic uncertainty are likely to continue to impact on construction costs going forward into the next monitoring period. Further research and investigation around evidence of local build costs and for different scales of development will be required to inform the viability evidence for the Replacement LDP.

Following the end of the current monitoring period, in May 2022 the Welsh Government published amendments to Parts L, F and O of the Building Regulations in Wales covering energy efficiency, ventilation, and overheating. These changes will take effect on the 23rd of November 2022 during the next monitoring period. The impact of these additional costs has been tested within the viability model in line with the approach taken by other authorities in their high-level viability testing. Further consideration will be given to the allowance applied as part of the viability evidence for the Replacement LDP to reflect the final published documents and emerging evidence around these costs.

New mandatory standards involving approval from the Sustainable Drainage Approval Body (SAB) relating to surface water systems were introduced by the Welsh Government in 2019. The additional costs involved in meeting these standards, including the implementation of Sustainable Urban Drainage Systems (SuDS) within a development and any commuted sums to be paid towards adoption of SuDS by the SAB, will depend on site specific circumstances. Therefore, it is not considered appropriate to include an allowance as part of the high-level viability monitoring at this stage. However, the evidence around the impact of SuDS and related impacts on other viability assumptions, such as site area and density of development, will continue to be monitored and considered in preparing the Replacement LDP.

With regards to land values, the LDP's Viability Assessment (2016) applied a Benchmark Land Value (BLV) of £300,000 per ha, with a value of £30,000 per plot applied to sites of three units or less. Current guide prices for development land for sale across the Powys LDP area are highly variable and site specific, but on average tend to be in the region of £400,000 and £500,000 per ha. However, guide prices represent aspirational values and therefore will not always reflect the price eventually paid for the land. Whilst some new development land appears to have been brought to the market during this monitoring period, it is noted that many sites recorded for AMR 2021 continued to be on the market for sale, and in some cases the guide price for the land had been reduced by up to 20%, which may indicate that landowners are willing to lower their expectations over land value.

For viability purposes, the price paid for land should be based on the Existing Use Value along with a reasonable uplift to incentivise the landowner to sell. Based on RICS/RAU Farmland Market Directory of Land Sales for the first half of 2021 the national average agricultural land value is £27,000 per ha, which represents an increase on the previous full year figure for 2020 of £25,000 per ha. The regional variation for Wales works out at around £22,000 per ha, whereas it was previously around £20,000 per ha. Therefore, there has been an increase in the average value of agricultural land compared to the £18,000 per ha applied at the time of the LDP's Viability Assessment (2016).

The Benchmark Land Value will need to be reviewed as part of the viability evidence for the Replacement LDP in order to ensure that it continues to be realistic and appropriate taking into account full planning policy requirements and any other known costs.

The assessment continues to use the same site typologies and housing mix as those applied by the DVS, as they are still considered to broadly reflect developments approved and put forward under the adopted LDP. A review of Section 106 agreements entered into under the LDP found that an allowance of £1,000 per unit continued to be appropriate.

The High-Level Viability Model has been constructed to produce a residual value that represents development profit, which is then compared against the target developer profit. The 17.5% target profit used by the District Valuers Service (LDP Viability Assessment, 2016) is still considered to be appropriate for use within the Powys LDP area.

The results of this viability testing indicate that across large site typologies (10 or more units) in the most viable sub-market areas of Central Powys, Severn Valley and North Powys residual values have increased by approximately 5% to 20% during this monitoring period. In terms of how this translates into profit margin, the results generally continue to remain within normal profit expectations of between 17.5% and 19% of Gross Development Value.

The results for some smaller site typologies of between 5-10 units have shown an increase in residual values, whereas others have shown a decrease in residual values, however their profit margins continue to exceed the target profit level of 17.5%, and therefore they continue to be viable.

Viability challenges remain in the South-West sub-market area where residual values have improved, but not to the extent needed to meet normal developer expectations around profit i.e., 17.5% of Gross Development Value. The results of the viability monitoring also continue to support the threshold of five units or more for seeking affordable housing contributions as the viability of sites of less than five units continues to be challenging. However, as reported under AMR2a, housing continues to be delivered on smaller sites. This highlights the need to review the viability assumptions applied in the South-West and to smaller sites to ensure that they are appropriate.

Whilst the viability results for this monitoring period are generally positive in that they support the adopted LDP's affordable housing targets, in view of the sensitivity of viability to house price, cost and land value factors and current uncertainty around these elements, it is considered that further investigation and research around these factors will be

necessary to inform the review of the LDP. The viability evidence underpinning the adopted LDP will be fully updated and reviewed as part of the Replacement LDP process.

Action

Further Investigation/Research Required

Development plan policies are not being implemented as intended and further research and/or investigation is required.

AMR14: No. of gypsy traveller sites and no. of pitches granted planning permission and delivered.

Objective:	Meeting Future Needs
Indicator:	No. of gypsy traveller sites and no. of pitches granted planning permission and delivered.
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	Topic Based Policy H11 – Gypsy and Traveller Site Provision
Target:	5 pitches provided in Machynlleth by 2021. 2 pitches provided in Welshpool by 2026.
Trigger Point:	Failure to deliver the 5 pitches in Machynlleth by 2021. Failure to deliver the 2 pitches in Welshpool by 2026.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	Monitoring completed 2021

Analysis

LDP Policy H11 - Gypsy and Traveller Site Provision, makes provision for seven gypsy and traveller pitches on two sites, one in Machynlleth and one in Welshpool as identified in the 2008 Gypsy and Traveller Accommodation Needs Assessment (updated 2014 and 2016).

The two pitches needed in Welshpool were completed by 31st March 2019.

The five pitches needed in Machynlleth were completed on 5th March 2021.

The target for this monitoring indicator has therefore been met successfully.

The records show there have been no other applications for this use during the 2021/22 monitoring period.

Action

Monitoring completed in 2021 and, therefore, no further monitoring required. The Replacement LDP will be informed by updated new evidence on needs.

AMR15: Amount of employment land (hectares) permitted on allocated sites in the Development Plan as a % of all employment allocations.

Objective:	Meeting Future Needs
Indicator:	Amount of employment land (hectares) permitted on allocated sites in the Development Plan as a % of all employment allocations.
Key Policies:	Strategic Policy SP2 – Employment Growth
Related Policies:	Topic Based Policy E1 – Employment Proposals on Allocated Employment Sites Topic Based Policy E2 – Employment Proposals on Non-Allocated Employment Sites
Target:	Total of 2ha of employment land to be permitted per annum on allocated sites in order to meet the minimum requirement of 30 hectares over the Plan period.
Trigger Point:	The total amount of employment land permitted falls below the cumulative requirement of 4ha for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Annual Monitoring Framework sets out an annual target of two hectares of employment land to be permitted on employment allocations in order to meet the employment requirement of 30 hectares (ha) over the lifespan of the LDP. The purpose of this indicator is to test whether the employment allocations are delivering employment land in line with the growth strategy and LDP policies SP2 and E2.

The total amount of employment land permitted on allocated employment sites during the period (1st April 2021 to 31st March 2022) totalled 0.745 ha. This equated to 2% of the allocated employment sites including those classified as ‘Mixed Use’ (45 ha).

The 0.745 ha stemmed from four planning applications on three separate allocated sites giving rise to a total floorspace of 2,429 square metres of a mixture of B2 and B8 floor space.

The trigger point for this monitoring indicator has been reached, the total amount of employment land permitted on allocated sites has been below the cumulative requirement of four hectares for two consecutive years. Research will be undertaken as evidence to support the preparation of the Replacement LDP, this will include reconsidering the employment land provision and the appropriateness of the allocated sites.

Table 14. Amount of Employment Land Permitted on Allocated Employment Sites Since LDP Adoption

Monitoring Period	Amount of Employment Land Permitted (ha)
17/04/2018 – 31/03/2019	4.297
2019-2020	0
2020-2021	1.809
2021-2022	0.745
Total	6.851

Action

Further Investigation/Research Required

Development plan policies are not being implemented as intended and further research and/or investigation is required.

Objective 2 – Sustainable Settlements and Communities

To support sustainable development, access to services and the integration of land uses, by directing housing, employment and services development in accordance with a sustainable settlement hierarchy. Higher levels of development will be directed to Powys’ towns and larger villages but where these are unable to sustain further growth due to capacity constraints, development will be accommodated in nearby towns or large villages.

Objective 2 Core Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR17b	Net housing units completed within each settlement tier measured as a percentage of all housing development completed per annum.		Continue Monitoring

AMR17b: Net housing units completed within each settlement tier measured as a percentage of all housing development completed per annum.

Objective:	Sustainable Settlements and Communities
Indicator:	AMR17b: Net housing units completed within each settlement tier measured as a percentage of all housing development completed per annum.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	Topic Based Policy H1 – Housing Development Proposals
Target:	<p>% of net housing units completed by tier of hierarchy per annum to accord with the following distribution:</p> <p>Towns – at least 50% of total housing growth.</p> <p>Large Villages – at least 25% of total housing growth.</p> <p>Small Villages – no more than 10% of total housing growth.</p> <p>Rural Settlements / Open Countryside including the undeveloped coast no more than 15% of total housing growth.</p>
Trigger Point:	<p>Proportion of total housing development completed:</p> <p>a) falls below the targets for Towns and Large Villages;</p> <p>b) exceeds the targets for Small Villages and Rural Settlements / Open Countryside including the undeveloped coast;</p> <p>for two consecutive years.</p>

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	N/A
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This is a new monitoring indicator required by the Welsh Government in the Development Plans Manual Edition 3 (March 2020). The purpose of this indicator is to look at the spatial distribution of housing development and to monitor housing completions each year in line with the growth strategy and the settlement hierarchy.

It is similar to monitoring indicator AMR17, which looks at the distribution of housing developments permitted across the settlement hierarchy. The monitoring for this indicator will look at whether residential developments **completed** are distributed across the settlement hierarchy in consistence with LDP Strategic Policy SP6.

Table 15 below shows the results for this monitoring period (1st April 2021 to 31st March 2022) together with the distribution of cumulative completions since the housing provision base date 1st April 2015. The results show that the distribution of additional dwellings across the settlement hierarchy is in line with the adopted LDP strategy, apart from for the

Towns where the percentage is still below but getting closer to the 50% compared to the previous year.

When comparing the data from this monitoring period with the cumulative data, it can be concluded that the more recent completions are more aligned to the strategy in terms of their distribution across the settlement hierarchy. The main reason for this is the time lag between a development being granted planning permission and being built. The LDP was adopted 17th April 2018, previous to this planning applications were granted in accordance with the Unitary Development Plan (UDP), which had a different strategy and settlement hierarchy.

The performance of this indicator does not accurately reflect whether the policies in the LDP are working, the location of additional dwellings is dependent on factors such as the date of the planning permission (as discussed above) and market factors particularly for the early years of the plan. It is therefore recommended that due to the improving picture, with regards to the spatial distribution of housing completions in alignment with the settlement hierarchy, that the monitoring of this indicator continues with no further action required.

Table 15. Net Number of Additional Dwellings Delivered in the Monitoring Period and since the LDP Housing Provision Base Date, against the Settlement Hierarchy Targets in LDP Policy SP6.

Settlement Hierarchy	Net number of additional dwellings in monitoring period	Percentage	Cumulative number of additional dwellings in since 1 st April 2015	Cumulative Percentage	Monitoring Target
Town	177	48%	846	46%	>50%
Large Village	129	35%	463	25%	>25%
Small Village	18	5%	149	8%	<10%
Open Countryside / Rural Settlement	45	12%	390	21%	<15%
Total	369		1,848		100%

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 4 – Climate Change and Flooding

To support the transition to a low carbon and low waste Powys through all development, including the reduction of waste to landfill and by directing development away from high flood risk areas and, where possible, to reduce or better manage existing flood risk for communities, infrastructure and businesses.

Objective 4 Core Indicator - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR23	Number of highly vulnerable developments granted planning permission within C2 floodplain areas. Number of developments granted planning permission in C1 floodplain areas.		Continue Monitoring

AMR23:

Number of highly vulnerable developments granted planning permission within C2 floodplain areas.

Number of developments granted planning permission in C1 floodplain areas.

Objective:	Climate Change and Flooding
Indicator:	Number of highly vulnerable developments granted planning permission within C2 floodplain areas. Number of developments granted planning permission in C1 floodplain areas.
Key Policies:	Development Management Policy DM5 – Development and Flood Risk
Related Policies:	
Target:	No highly vulnerable developments units to be permitted within C2 floodplain areas. No developments to be permitted within C1 floodplain areas without meeting all TAN 15 tests.
Trigger Point:	1 or more highly vulnerable developments permitted within C2 floodplain areas in any one year. 1 or more developments permitted within C1 floodplain areas where not all TAN 15 tests are met in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the number of highly vulnerable developments permitted within the C1 (areas of the floodplain served by flood defences) and C2 (areas of the floodplain with no flood defences) floodzones of the TAN 15 Development Advice Maps. It is designed to test the implementation of LDP Policy DM5, however it also allows an observation on how applications permitted accord with TAN 15.

Highly vulnerable development is classed in TAN 15 as “all residential premises (including hotels and caravan parks), public buildings (e.g., schools, libraries, leisure centres) especially vulnerable industrial development (e.g., power stations, chemical plants, incinerators), and waste disposal sites.”

Development permitted in C2

In this monitoring period, 1st April 2021 to 31st March 2022, a total of 17 planning applications were permitted for highly vulnerable development that encroached either partially or wholly into the C2 flood zone. Thirteen of these applications, partially encroached on the C2 flood zone. However, all buildings, which included holiday cabins and dwellings, were located outside of any areas at risk from flooding.

Two of the remaining four planning permissions were considered acceptable due to the existing use already being classed as highly vulnerable development and the proposed use not resulting in any intensification of that use.

Of the remaining two, both were for proposals to revert properties from their retail use to a former residential use. Wider consideration was given in these instances to them being existing buildings, which had had a former residential use, and which were also located within the centre of a town.

Development permitted in C1

During the monitoring period, no planning applications were permitted for highly vulnerable development that encroached either partially or wholly into the C1 flood zone. Therefore, the monitoring trigger in respect of the C1 flood risk areas has not been breached.

It is worth noting that when Officers are determining planning applications regard is also given to Flood Map for Planning (FMfP) as a material planning consideration. The C1 flood risk areas are not included within FMfP, they have been replaced with defended areas which have been designated using different criteria to the C1 flood risk areas. In Powys, other than in Newtown, the defended areas do **not** align with the C1 flood risk areas.

This monitoring indicator will be updated and reviewed in the Replacement LDP, to take into consideration the forthcoming replacement TAN 15 due to be published in June 2023 and FMfP.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

5. Analysis of local indicators

5.1.1 Local Indicators are identified in the Annual Monitoring Framework which forms Chapter 5 of the Adopted LDP.

5.1.2 Unless stated otherwise only Full and Outline planning applications permitted have been considered to prevent any double counting

Theme 1 – Planning for Growth in Sustainable Places

Objective 1 – Meeting Future Needs

To meet the needs arising in Powys over the plan period up to 2026, to provide adequate, appropriately located land for:

- i. 5,588 dwellings to deliver a dwelling requirement of 4,500 which will meet all the housing needs of Powys’ increasing and ageing population and its decreasing size of households, including open market and affordable housing, gypsy and traveller accommodation and other specialist housing needs.
- ii. 45 hectares of employment and economic development uses.
- iii. Retail, tourism, recreation, infrastructure, services and other needs.

Objective 1 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR4	Total housing units permitted on allocated sites (HA) as a % of overall housing provision.		To be Reconsidered in Replacement LDP.
AMR5	Total housing units completed on Housing Allocations (HA).		To be Reconsidered in Replacement LDP.
AMR6	Number of housing units completed on windfall sites (non-allocated sites) per annum.		Continue Monitoring
AMR8	Number of planning permissions, or subsequent variation/removal of planning conditions, approvals of discharge/modification under section 106A or by Deed of Variation, relating to housing developments of 5 units or more, where the affordable housing contribution permitted is lower than the relevant target set under Policy H5.		Continue Monitoring
AMR10	Number of affordable housing contributions (units or equivalent) secured through planning permissions on-site, off-site and via commuted sums.		Continue Monitoring
AMR11	Number of Social Rented and Intermediate Housing units secured as a % of all affordable housing units secured through planning permissions.		Continue Monitoring
AMR12	The preparation and adoption of Supplementary Planning Guidance relating to Affordable Housing.	SPG adopted	No Further Action Required
AMR13	The scale of affordable housing developments permitted on exception sites in Towns, Large Villages, Small Villages and Rural Settlements.		Continue Monitoring

Ref No:	Indicator	Assessment	Action
AMR16	Retail development up to 1,000 square metres net permitted and delivered on part of the mixed use site allocated under Policy R2.		Further Investigation/Research Required

AMR4: Total housing units permitted on allocated sites (HA) as a % of overall housing provision.

Objective:	Meeting Future Needs
Indicator:	Total housing units permitted on allocated sites (HA) as a % of overall housing provision.
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	Topic Based Policy H2 – Housing Sites
Target:	8% of overall housing provision on HA sites to be permitted per annum.
Trigger Point:	The percentage of overall housing provision permitted on HA sites falls below the target for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

During the monitoring period a total of 121 units were granted planning permission on two LDP allocated housing sites (HA) as shown in Table 16 below.

As a percentage of overall housing provision on HA sites, this is 121 units out of 2,984 (Table H2 in the LDP) equating to 4.1%.

The figure is below the 8% percent per annum target which equates to 239 units being permitted per annum. This means that the trigger point for this monitoring indicator continues to be breached due to under-provision over three consecutive years as follows:

- AMR 2020: 176 units – 5.9%
- AMR 2021: 67 units – 2.2%
- AMR 2022: 121 units – 4.1%

Annex 1 (Table 19) which informs the Housing Trajectory provides the following cumulative information about Housing Allocations: There are 80 Housing Allocation (HA) sites in the LDP, of which, at this year's base date 54 carry the status "allocated, no permission". Of these, 38 sites have no record of any planning discussions or application, four are pending a planning decision, one has only a part permission (three units of 40), 10 have been subject to some discussion and/or formal pre-application advice and the other one site has a lapsed consent.

The other 26 allocated sites are performing as follows: three completed sites, four commenced (some units built), one superseded site and 18 sites have planning permission but are not yet started (some still need a Reserved Matters permission, some are in the phosphate sensitive River SAC catchment areas where the LPA is unable to grant consent for new build housing proposals).

Table 16. Residential Planning Permissions Granted on Sites Allocated for Housing During Monitoring Period.

Site Ref and Planning Permission Reference	Site Name	Description of Development	Units Granted Permission	Units/Capacity in the LDP (Policy H2 table)
20/1314/FUL	Land at Bryn y Groes, Cwmgiedd - P58 HA10	Full planning application for residential development and associated works	117	136
21/0228/FUL	Milford Park Adj. Hendidley, Milford Rd, Newtown - P48 HA2	Erection of 4 dwellings and all associated works – full planning permission	4	15

Action

To be Reconsidered in Replacement LDP

The plan's strategy is not being delivered.

AMR5: Total housing units completed on Housing Allocations (HA).

Objective:	Meeting Future Needs
Indicator:	Total housing units completed on Housing Allocations (HA).
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	Topic Based Policy H2 – Housing Sites
Target:	The number of housing units on HA sites to be completed per annum as follows: 2015-2016: 45 2016-2017: 221 2017-2018: 232 2018-2019: 254 2019-2020: 287 2020-2021: 304 2021-2022: 372 2022-2023: 325 2023-2024: 329 2024-2025: 312 2025-2026: 303
Trigger Point:	The number of additional dwellings completed on HA sites falls below the annual target for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Annual Monitoring Framework sets an annual target of housing units to be completed on housing allocations (HA). This target is based on the rate of delivery set out in the LDP's (original) trajectory. The annual target for the year 2021-2022 is 372 units.

During the monitoring period a total of 67 units were completed on LDP allocated housing sites as detailed in Table 17 below. This is 18% of the target completions for the year.

Cumulatively, the number of completions on allocated (HA) sites since the LDP was adopted is 155 with annual completions as follows:

- 2018-19: 6 completions against a target of 254
- 2019-20: 11 completions against a target of 287
- 2020-21: 71 completions against a target of 304
- 2021-22: 67 completions against a target of 372

Whilst the completions in this monitoring year are broadly comparable to the units completed last year, the performance on housing allocations remains under-target and, overall, dwelling completions on housing allocations are much lower than planned. The

trigger point for this monitoring indicator continues to be breached due to under-delivery over three consecutive years.

A revised annual Housing Trajectory became a requirement of the AMR process arising from the Development Plans Manual Edition 3 (March 2020). This year's trajectory (monitoring indicator AMR 2a) shows how allocated sites are anticipated to contribute towards housing delivery. A detailed breakdown on the phasing of each HA site is available in Annexe 1 (Table 19) of this AMR. The Housing Stakeholder Group have been involved in this work and the table is reviewed every year.

Future development in some areas is subject to significant environmental constraints concerning phosphate levels in River SACs (which became a newly arising issue from December 2020 and currently affects the catchments of the rivers Wye, Usk, Towy and Dee in Powys). This is an issue that will need careful consideration for the Replacement LDP.

Allocated sites which do not deliver in the adopted LDP 15-year plan period will need careful consideration for the Replacement LDP and will not simply roll forward. In contrast to the delivery of homes on windfall sites (see completions data in monitoring indicator AMR 6), it is apparent that many LDP land allocations are currently failing to deliver their quota of homes.

Table 17. Residential Completions on Sites Allocated for Housing during the Monitoring Period.

Designation	Location	Affordable Type	Number completed this year
Part Allocated P07 HA3	Land To The Rear Of Greenfields (Drovers Meadow) Minfield Lane Bronllys Powys LD3 1DS	Affordable	3
		Open Market	9
Allocation P28 HA3	1-55 Glan Yr Ithon Land East Of Ithon Road Ithon Road Llandrindod Powys LD1 6AS (LD1 6EJ)	Rent to Own	17
		Social Rented	38
		Total	67 units

Action

To be Reconsidered in Replacement LDP

The plan's strategy is not being delivered.

AMR6: Number of housing units completed on windfall sites (non-allocated sites) per annum.

Objective:	Meeting Future Needs
Indicator:	Number of housing units completed on windfall sites (non-allocated sites) per annum.
Key Policies:	Strategic Policy SP1 – Housing Growth
Related Policies:	
Target:	For the amount of development delivered on windfall sites to align with that anticipated by the windfall projection of 110 dwellings per annum.
Trigger Point:	The number of housing units delivered on windfall sites deviates from the cumulative projection of 220 dwellings over two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

Of the 369 housing completions in this monitoring year, 264 were on windfall sites, 67 on allocated or part allocated sites and 38 on committed/landbank sites.

It is evident that there have been considerably more completions on windfall sites against the target assumption this year, with 154 completions above the target of 110. This figure of 264 completions compares to 185 completions in the previous monitoring year 2020-2021.

The indicator shows that the completions figure has deviated above the assumption of 220 dwellings for the two consecutive years. Exceeding the cumulative target of 220 dwellings identified as the trigger point is not a concern as it means that windfall completions are contributing strongly to the supply of new homes in the Powys LDP area. This may be considered a useful counterbalance to the slower than planned delivery rates of homes on both LDP Housing Allocations (HA sites) and LDP Housing Commitments (HC sites).

The strength of windfall site performance can be attributed to several factors, this includes an improved monitoring system that tracks the progress of housing permissions granted, rather than relying on Building Control completions data. Completions are now being recorded on windfall sites consented before the LDP was adopted (March 2018). At this time the Unitary Development Plan was subject to the Joint Housing Land Availability Study (JHLAS) five-year housing supply shortfall, which, at the time, gave greater weight to consenting planning permissions on non-allocated sites

Otherwise, in common with historic trends, the performance of small sites (less than five dwellings) including self-build/single unit homes, being delivered across the county continues to remain strong.

This windfall data will be used to inform housing policy in the Replacement LDP.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR8: Number of planning permissions, or subsequent variation/removal of planning conditions, approvals of discharge/modification under section 106A or by Deed of Variation, relating to housing developments of 5 units or more, where the affordable housing contribution permitted is lower than the relevant target set under Policy H5.

Objective:	Meeting Future Needs
Indicator:	Number of planning permissions, or subsequent variation/removal of planning conditions, approvals of discharge/modification under section 106A or by Deed of Variation, relating to housing developments of 5 units or more, where the affordable housing contribution permitted is lower than the relevant target set under Policy H5.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	Topic Based Policy H5 – Affordable Housing Contributions
Target:	No reduction in or removal of the target contributions permitted, unless in accordance with the provision made within Policy H5 for reduction/removal of this requirement.
Trigger Point:	1 or more housing developments permitted, or subsequent variation/removal of planning conditions, approvals for discharge/modification under section 106A or by Deed of Variation, relating to housing developments of 5 units or more, where the affordable housing contribution permitted is lower than the relevant target set under Policy H5 and not in accordance with Policy H5 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator seeks to identify cases where lower percentages of affordable housing than those required to meet the policy targets have been permitted. It captures the percentage secured as part of original permissions, along with any subsequent applications that may have been made to reduce or remove the affordable housing contribution below that expected by the target. Provision is made within LDP Policy H5 for contributions to be negotiated on individual developments were supported by site specific viability evidence.

The results of monitoring indicator AMR7 already indicate that LDP Policy H5 targets are being met at the original planning permission stage.

The previous results for this monitoring indicator found that there were inconsistencies in the way that LDP Policy H5 was being applied to conversions and changes of use. The results of this year’s monitoring identified a case involving change of use of offices to six residential units, where one of the units was secured as an affordable housing unit. Another case involved an application for conversion of redundant agricultural buildings to three dwellings, submitted alongside an application for conversion of other redundant

agricultural buildings to eight units on the same holding. The applications were accompanied by a viability report, however detailed costings and a detailed financial viability appraisal were not provided. In this case, the requirement for one of the units to be provided as affordable housing was applied to the larger scheme. This suggests that the policy requirement for affordable housing is being applied more consistently in relation to conversions and changes of use.

With regards to subsequent applications involving changes to affordable housing requirements, two cases have been noted involving the removal of affordable housing conditions/obligations attached to planning permissions on viability grounds.

The first case involved an affordable housing contribution on a four-dwelling scheme in Llanllwchaiarn, Newtown, equating to one unit, which had originally been sought on the basis of the site area, as it exceeded the policy threshold of 0.25 ha. The application was accompanied by a detailed Development Viability Assessment that was reviewed by Planning Policy using the regional Development Viability Model. This review of site-specific viability found that, in this instance, it would not be viable to provide a contribution towards affordable housing as part of this development.

The second case involved an application for the removal of the 20% affordable housing contribution for a development at Arddleen, which would have equated to the provision of two affordable units. The application was accompanied by a Financial Viability Appraisal, which was reviewed by Planning Policy using the regional Development Viability Model. It was noted the land was also subject to a separate Section 106 agreement entered into in 1996 requiring a contribution to be made towards payment of the Council's deficit for requisition of the mains sewer to Arddleen. This drainage contribution, along with the required pedestrian footway, represented significant abnormal costs, and were prioritised in viability negotiations as essential infrastructure, in line with the approach set out in LDP Policy DM1 towards prioritising planning obligations. The site-specific viability review found that the development, with an affordable housing contribution, would not be viable. The Section 106 agreement relating to affordable housing was, therefore, revoked.

It should be noted that the density of both of the above-mentioned developments was significantly lower than would be expected under current policies or assumed in the LDP's viability evidence, which is likely to have impacted on viability. Both of the developments were originally approved as departures under the former Powys Unitary Development Plan, however the affordable housing contributions secured aligned with the emerging LDP evidence at the time. Such developments would not necessarily reflect typical developments put forward under the LDP, for example the site at Arddleen required a lengthy pedestrian footway due to the distance of the site from the settlement.

The results of this monitoring are positive in that they indicate that affordable housing policy targets set out within LDP Policy H5 are being met in the first instance. Where viability challenges have subsequently been received, these have been supported by site specific viability evidence, which has been reviewed and assessed by Planning Policy. This approach is in line with the provision made within LDP Policy H5 for negotiations on affordable housing contributions to take place on a site-by-site basis and fully informed by viability evidence.

Action

Continue monitoring. - Development plan policies are being implemented effectively.

AMR10: Number of affordable housing contributions (units or equivalent) secured through planning permissions on-site, off-site and via commuted sums.

Objective:	Meeting Future Needs
Indicator:	Number of affordable housing contributions (units or equivalent) secured through planning permissions on-site, off-site and via commuted sums.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	Topic Based Policy H5 – Affordable Housing Contributions
Target:	For the majority of affordable housing contributions secured through planning permission to be provided on-site.
Trigger Point:	The total number of affordable housing contributions secured through planning permissions off-site and via commuted sums exceeds the total number of affordable housing contributions (units) secured on-site in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the type of affordable housing contribution that has been secured through planning permissions i.e., whether the contribution secured is to be made on-site, off-site or via a financial contribution. It is designed to test the implementation of the part of LDP Policy H5 that sets a presumption in favour of on-site contributions rather than other types of contributions unless on-site provision would be inappropriate.

The results for this monitoring period are summarised in Table 18.

A total of 57 affordable housing units have been permitted under LDP Policy H5, as part of developments within development boundaries during this monitoring period. This included eight affordable housing units permitted on market developments, 32 affordable housing units permitted on a development by a Registered Social Landlord (RSL) and 17 affordable housing units permitted on a development by the Strategic Housing Authority (SHA).

All 57 affordable housing units are to be provided on-site, with no indication of off-site provision or financial contributions at the planning application stage. The results of this monitoring indicate that this part of LDP Policy H5 is being implemented correctly in that affordable housing provision is being secured on-site, which demonstrates that affordable housing will be provided in the location where it is needed. Therefore, no action is required and monitoring will continue.

The approach set out within LDP Policy H5 is supported by further practical guidance in the Affordable Housing SPG. This provides guidance on the circumstances where alternative types of provision may be appropriate and also on the method for calculating financial contributions and how financial contributions obtained will be used by the Council for the purpose of affordable housing provision.

Table 18. Affordable Housing Units Secured by Type during the Monitoring Period.

Type of contribution	Amount of units (equivalent)	% of total units by type
On-site	57	100%
Off-site	0	0%
Financial contributions	0	0%

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR11: Number of Social Rented and Intermediate Housing units secured as a % of all affordable housing units secured through planning permissions.

Objective:	Meeting Future Needs
Indicator:	Number of Social Rented and Intermediate Housing units secured as a % of all affordable housing units secured through planning permissions.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	
Target:	For the average affordable housing tenure mix secured through planning permissions to be in accordance with the evidence of housing needs identified in the Local Housing Market Assessment of: <ul style="list-style-type: none"> • Social rented – 75%. • Intermediate rented housing – 25% • Or revised percentages within any updated LHMA.
Trigger Point:	The average affordable housing tenure mix secured through planning permissions does not accord with the evidence of need identified in the LHMA for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the tenure of affordable housing that is being secured through planning permissions, as part of market developments and on exception sites. It is designed to test the implementation of LDP Strategic Policy SP3 where the reasoned justification states that the range of unit tenure should reflect local housing needs. It makes reference to the evidence of need for social rented/intermediate tenure mix within the Local Housing Market Assessment (LHMA) and explains that alternative mixes will only be considered where supported by local evidence.

The results of this monitoring are summarised in Table 19. The results show that the majority of affordable housing secured is social rented, with an element of intermediate affordable housing for sale also being secured. The tenure split secured is in line with the evidence of need within the Local Housing Market Assessment (2016).

The tenure of three affordable housing units secured during the monitoring period had not been specified. These units related to affordable units secured as part of market developments under LDP Policy H5 and are likely to be provided as intermediate affordable housing for rent or for sale. The details around tenure may not be provided until discharge of conditions stage, and therefore will not yet be specified.

In future, this indicator will be monitored against the tenure split identified by the new Local Housing Market Assessment 2022, which is due to be undertaken during the next monitoring period.

Table 19. Number of Affordable Housing Units Permitted by Tenure during the Monitoring Period.

Tenure	Number of units	% of overall units
Social rented	82	85%
Intermediate rented	0	0%
Intermediate for sale	11	12%
Not specified	3	3%

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR12: The preparation and LDP Adopted: of Supplementary Planning Guidance relating to Affordable Housing.

Objective:	Meeting Future Needs
Indicator:	The preparation and adoption of Supplementary Planning Guidance relating to Affordable Housing.
Key Policies:	Strategic Policy SP3 – Affordable Housing Target
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance relating to Affordable Housing within 6 months of adoption of the Plan.
Trigger Point:	The Affordable Housing SPG is not adopted within 6 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018 - SPG Adopted October 2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Affordable Housing SPG, which updated previous guidance, was adopted in October 2018 and therefore within the timescale of 6 months from the date of LDP adoption.

Action

No action required at this time, continue to monitor.

AMR13: The scale of affordable housing developments permitted on exception sites in Towns, Large Villages, Small Villages and Rural Settlements

Objective:	Meeting Future Needs
Indicator:	The scale of affordable housing developments permitted on exception sites in Towns, Large Villages, Small Villages and Rural Settlements.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	Topic Based Policy H1 – Housing Development Proposals Topic Based Policy H6 – Affordable Housing Exception Sites
Target:	For the scale of affordable housing developments permitted on exception sites to be appropriate to the settlement tier.
Trigger Point:	1 or more developments permitted for single affordable homes on exception sites in Towns and Large Villages in any one year. 1 or more developments permitted in Small Villages where the development involves more than 5 affordable homes. 1 or more developments permitted in Rural Settlements where the development does not involve a single affordable home in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the scale of affordable housing developments permitted on exception sites based on their settlement tier. It is designed to test LDP policies H6 and H1, which require developments to be of an appropriate scale to the settlement tier. In particular, the monitoring seeks to capture instances where single dwelling developments have been permitted on exception sites in Towns and Large Villages, and conversely where large-scale development has been permitted in Small Villages or Rural Settlements.

The reasoned justification to LDP Policy H6 explains that sites adjacent to Towns and Large Villages are likely to be suited to accommodating larger affordable housing schemes and therefore that these sites should be reserved for Registered Social Landlord (RSL) or Strategic Housing Authority (SHA) developments, and that individual dwellings should not be permitted on such sites. This intention is reinforced in the Affordable Housing SPG, which also sets out exceptional circumstances for when smaller schemes may be permitted in these locations.

A total of three developments were permitted on affordable housing exception sites, for a total of 35 affordable housing units, during this monitoring period. This included a scheme for 33 units adjacent to the Town of Montgomery submitted on behalf of Barcud Housing Association, which accorded with the policy expectation for sites in these locations to be reserved for larger developments by RSLs or the SHA.

Another development involved a single affordable dwelling adjacent to the Town of Llanidloes. Single unit developments by individuals would not normally be permitted on exception sites adjacent to Towns and Large Villages unless in exceptional circumstances. In this case, it was demonstrated that site specific constraints, including topography, tree protection zones, watercourses, and drainage, meant that the site would be unsuitable for larger development by an RSL or the SHA.

The third development involved a single affordable dwelling in the Rural Settlement of Llanfihangel-yng-Ngwynfa, where the Officer had recommended refusal as the proposed location was not considered to be well integrated into the settlement. The application was approved by Committee as the site fitted into the ribbon type development of the settlement and therefore considered to be well integrated.

The results of this monitoring demonstrate that the scale of affordable housing permitted on exception sites, in terms of dwelling numbers, complies with LDP policies H1 and H6, with the examples captured here relating to Towns and a Rural Settlement. In particular, the development of affordable housing by a RSL, Barcud Housing Association, adjacent to a Town, is of the scale and type envisaged by these policies. The development of a single affordable dwelling adjacent to Llanidloes was justified on site specific grounds, and the single affordable dwelling at Llanfihangel-yng-Ngwynfa was in line with the scale expected by policy in a Rural Settlement.

The overall number of housing units permitted on affordable housing exception sites has more than doubled since the previous monitoring period, with affordable housing exception sites accounting for a third of affordable housing units permitted during this monitoring period. Numbers of affordable housing delivered on the ground are generally increasing driven by RSL and SHA developments – see monitoring indicator AMR3.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR16: Retail development up to 1,000 square metres net permitted and delivered on part of the mixed use site allocated under Policy R2.

Objective:	Meeting Future Needs
Indicator:	Retail development up to 1,000 square metres net permitted and delivered on part of the mixed use site allocated under Policy R2.
Key Policies:	Strategic Policy SP4 – Retail Growth
Related Policies:	Topic Based Policy R2 – Retail Allocations
Target:	<ul style="list-style-type: none"> • Pre-application processed by 2020. • Planning permission granted by 2022. • Commencement of development by 2024. • Completion of development by 2026.
Trigger Point:	Failure to meet any of the set targets in respect of the development stages

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This mixed-use allocation (Reference: P51 MUA1) on the former Kaye Foundry Site in Presteigne contains the only new retail allocation in the Plan.

By the end of 2020, the LPA had not been notified of any activity/progress on the retail development proposals. The target for processing a pre-application enquiry was therefore missed and the trigger point breached.

It is anticipated that new retail proposals could be significantly impacted by the Covid-19 pandemic. Nevertheless, there is time for a planning application to be submitted and determined during 2022. It is therefore recommended that the site is kept under review. Further investigation/research may be necessary with the site owner to try to pro-actively meet this delivery requirement and successfully address the retail needs identified in the Plan.

In May 2022, through the Housing Trajectory work, the Council contacted the company believed to own the site and requested an update on the site's housing and retail status but did not receive a reply. The previous agent no longer has dealings with the site.

Action

Further Investigation/Research Required - Development plan policies are not being implemented as intended and further research and/or investigation is required.

Objective 2 – Sustainable Settlements and Communities

To support sustainable development, access to services and the integration of land uses, by directing housing, employment and services development in accordance with a sustainable settlement hierarchy. Higher levels of development will be directed to Powys’ towns and larger villages but where these are unable to sustain further growth due to capacity constraints, development will be accommodated in nearby towns or large villages.

Objective 2 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR17	Net housing units permitted within each settlement tier measured as a percentage of all housing development permitted per annum.		Continue Monitoring
AMR18	Number of open market housing developments permitted in Small Villages. Number of affordable housing developments permitted in Small Villages.		Continue Monitoring
AMR19	Net employment land permitted within each settlement tier measured as a percentage of all employment land permitted.		Further Investigation/Research Required

AMR17: Net housing units permitted within each settlement tier measured as a percentage of all housing development permitted per annum.

Objective:	Sustainable Settlements and Communities
Indicator:	Net housing units permitted within each settlement tier measured as a percentage of all housing development permitted per annum.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	Topic Based Policy H1 – Housing Development Proposals
Target:	% of net housing units permitted by tier of hierarchy per annum to accord with the following distribution: <ul style="list-style-type: none"> • Towns – at least 50% of total housing growth permitted. • Large Villages – at least 25% of total housing growth permitted. • Small Villages – no more than 10% of total housing growth permitted. • Rural Settlements / Open Countryside including the undeveloped coast no more than 15% of total housing growth permitted.
Trigger Point:	Proportion of total housing development permitted: <ol style="list-style-type: none"> a) falls below the targets for Towns and Large Villages; b) exceeds the targets for Small Villages and Rural Settlements / Open Countryside including the undeveloped coast; for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the distribution of housing developments permitted across the settlement hierarchy, it is designed to test LDP policies SP6 and H1. In particular, the monitoring looks at whether residential development is being permitted in a way that distributes growth across the settlement hierarchy in consistence with LDP Strategic Policy SP6.

Table 20 below shows the net number of dwellings permitted in the monitoring period against the settlement hierarchy. This figure is then used to calculate the percentage of residential growth that has been permitted for each of the settlement tiers. Two further columns show the cumulative total and percentage, these relate to the number of units permitted since LDP Adoption, 17th April 2018. The final column shows the monitoring target which comes from LDP Policy SP6.

The results from this monitoring period indicate that the residential distribution part, of LDP policies SP6 and H1, are being implemented correctly; with the majority of residential

developments being permitted in the upper two tiers of the settlement hierarchy within the expectations set out in the settlement strategy of the LDP.

The percentage of dwelling units permitted in the period in the Open Countryside is above what is set out in the LDP strategy at 18% but looking at the cumulative percentage the target of below 15% has still been met for the cumulative number of dwelling units permitted since the LDP was adopted. This demonstrates the importance of looking at trends over several years, all the values in the cumulative percentage column of Table 20 are within the settlement hierarchy monitoring targets set out in LDP Policy SP6. The majority of the dwellings permitted in the Open Countryside are either for rural enterprise dwellings or barn conversions complying with National and LDP policy.

Table 20. Net Number of Dwellings Permitted in the Monitoring Period and since the LDP was Adopted against the Settlement Hierarchy Targets in LDP Strategic Policy SP6.

Settlement Hierarchy	Net number of dwellings permitted in monitoring period	Percentage	Cumulative total of net number of dwellings permitted since LDP adopted	Cumulative Percentage	Monitoring Target
Town	223	63%	968	59%	>50%
Large Village	63	18%	417	26%	>25%
Small Village	4	1%	51	3%	<10%
Open Countryside / Rural Settlement	64	18%	197	12%	<15%
Total	354		1,633		100%

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR18:

Number of open market housing developments permitted in Small Villages.

Number of affordable housing developments permitted in Small Villages.

Objective:	Sustainable Settlements and Communities
Indicator:	Number of open market housing developments permitted in Small Villages. Number of affordable housing developments permitted in Small Villages.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	Topic Based Policy H1 – Housing Development Proposals
Target:	<ul style="list-style-type: none"> • No open market housing developments of more than 2 units to be permitted in Small Villages. • No affordable housing developments of more than 5 units to be permitted in Small Villages.
Trigger Point:	<ul style="list-style-type: none"> • 1 or more open market housing developments of more than 2 units permitted in Small Villages. • 1 or more affordable housing developments of more than 5 units permitted in Small Villages.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator helps to assess whether the LDPs more restrictive approach to housing in lower tier settlements is being implemented. Not every Small Village will be suitable for growth, but in those that have suitable available land, the Plan provides for small-scale housing growth. Housing should only be permitted on small sites (of up to 0.25ha) with further restrictions on open market housing in this tier (two dwellings maximum on each site and a presumption for infill sites only).

Table 21 below shows the Small Villages where planning permission was granted for new dwellings during the monitoring period. Note that the two dwellings at Y Fan are on separate plots. Meanwhile there have not been any permissions for affordable homes in Small Villages in this AMR monitoring period.

The development permitted in Small Villages is policy compliant as the number of open market homes has not exceeded two on any one plot. This means that the policy target is being met and that the trigger point has not been breached.

Table 21. Number of New Dwellings granted Planning Permission in Small Villages in Monitoring Period.

Small Village	Number of New Open Market Homes (Net) Permitted	Number of New Affordable Homes (Net) Permitted
Glantwymyn (conversion)	1	0
Llanerfyl (conversion)	1	0
Y Fan	2	0

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR19: Net employment land permitted within each settlement tier measured as a percentage of all employment land permitted.

Objective:	Sustainable Settlements and Communities
Indicator:	Net employment land permitted within each settlement tier measured as a percentage of all employment land permitted.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	
Target:	% of net employment land permitted by tier of hierarchy per annum to accord with the following distribution: <ul style="list-style-type: none"> • Towns – at least 50% of total employment growth permitted. • Large Villages – no more than 20% of total employment growth permitted. • Sites located outside the settlement hierarchy – no more than 30% of total employment growth.
Trigger Point:	Proportion of employment land permitted: <ul style="list-style-type: none"> a) falls below the target for Towns; b) exceeds the targets for Large Villages and Sites outside the settlement hierarchy; for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the distribution of employment developments permitted across the settlement hierarchy; it is designed to test LDP Strategic Policy SP6. In particular, the monitoring looks at whether employment development is being permitted in a way that distributes growth across the settlement hierarchy consistent with LDP Strategic Policy SP6.

Table 22 below shown the net area of employment land (in hectares) permitted across the settlement hierarchy in the monitoring period (1st April 2021 to 31st March 2022) and since the LDP was adopted (17th April 2018 to 31st March 2022). The net area of employment land is used to calculate the percentage of employment land growth that has been permitted for each of the settlement tiers. The final column shows the 'Monitoring Target' which comes from LDP Policy SP6.

LDP Policy SP6 directs the majority of employment development to the Towns. During the monitoring period the employment development permitted in the Towns was consistent with the policy meeting the 50% target. The cumulative total (permitted since LDP Adoption) for Towns accounts for 43% of employment growth but looking at the previous three monitoring documents (AMR 2021, AMR 2020 and the Monitoring Review) this cumulative total is moving closer to the 50% target each year.

The percentage of employment land permitted (37%) in the lower tiers of the settlement hierarchy exceeded the monitoring target (<30%) during the monitoring period, this

equated to a total of four applications. Two of the applications were for a change of use of an existing building, one was for the siting of storage containers on a disused timber yard, and one was for a bottling plant where the neighbouring buildings were of the same use. All four proposals complied with LDP policy.

The distribution of employment growth across the settlement hierarchy is dependent on the types of employment need and opportunities arising. The trigger point for this monitoring indicator has been reached, the proportion of employment land permitted in the lower tiers of the settlement hierarchy has exceeded the target for two consecutive years. Research will be undertaken as evidence to support the preparation of the Replacement LDP, this will include reconsidering targets and the spatial strategy with regards to employment development.

Table 22. Distribution of Employment Land Permitted during the Monitoring Period across the Settlement Hierarchy, together with the Cumulative Totals since LDP Adoption.

Settlement Hierarchy	Net area (ha) of employment land permitted in monitoring period	Percentage	Net area (ha) of employment land permitted since LDP adopted	Percentage	Monitoring Target
Town	1.814	51%	10.332	43%	>50%
Large Village	0.452	13%	6.17	26%	<20%
Small Village / Rural Settlement / Open Countryside	1.322	37%	7.654	32%	<30%
Total	3.588	100%	24.156	100%	100%

Action

Further Investigation/Research Required

Development plan policies are not being implemented as intended and further research and/or investigation is required.

Objective 3 – Efficient Use of Land

To support the re-use and remediation of suitably and sustainably located previously developed land and where this is not possible to make efficient use of green field sites. To apply a general presumption against unsustainable development in the open countryside including the undeveloped coast, development on soils of high environmental and agricultural value and important mineral resources which are recognised as finite resources.

Objective 3 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR20	Amount (hectares) and location of windfall development permitted on previously developed land and greenfield land.		Further Investigation/Research Required
AMR21	The average overall density (units per hectare) permitted in respect of housing developments in Towns, Large Villages, Small Villages and Rural Settlements.		Further Investigation/Research Required
AMR22	Amount of permanent, sterilising development permitted within a minerals safeguarding area.		Continue Monitoring

AMR20: Amount (hectares) and location of windfall development permitted on previously developed land and greenfield land.

Objective:	Efficient Use of Land
Indicator:	Amount (hectares) and location of windfall development permitted on previously developed land and greenfield land.
Key Policies:	Strategic Policy SP6 – Distribution of Growth across the Settlement Hierarchy
Related Policies:	
Target:	Amount (hectares) and location of windfall development permitted on previously developed land and greenfield land.
Trigger Point:	The majority of windfall development permitted is on greenfield land located outside the development boundaries of Towns and Large Villages.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the distribution of planning applications on windfall sites permitted, for all development types, across the settlement hierarchy. Further analysis is given as to whether the proposal was on a greenfield site or previously developed land as defined in Planning Policy Wales (Edition 11), published February 2021.

Initial findings show that during the monitoring period (1st April 2021 to 31st March 2022) permission was granted on windfall sites for an area totalling 453.99 hectares (ha). However, within the period planning permission (21/0559/OUT) was granted for the development of a Global Centre of Rail Excellence at the former Nant Helen Open Cast Coal Site. This application equates to 354.27 ha of the 453.99 ha, so has been removed to prevent the data being distorted, this gives a remaining total of 99.72 ha.

From this 99.72 ha, 22.89 ha (23%) of it was on previously developed land, with 75.55 ha (76%) on greenfield sites and 1.28 ha (1%) on a mixture of previously developed land and greenfield. However, on closer inspection it can be seen that some of the applications on greenfield sites will continue to be classified as greenfield when the development proposal is completed. This includes all permissions for agricultural developments (21.91 ha), open space proposals (3.46 ha) and renewable energy schemes (2.06 ha) - where the majority of the original land use remains the same (biomass boilers installed in existing agricultural buildings, and solar photovoltaic panels installed on agricultural land).

As a consequence, in order to properly assess and analyse this indicator against the LDP policies in detail, all applications for renewable energy - where the majority of the original land use remains the same, together with agricultural and open space development proposals will be **excluded** from the data. The analysis will concentrate solely on housing, employment, tourism and infrastructure and any other development in the Open Countryside that would bring about a change from greenfield to previously developed land.

The revised results show that during the monitoring period, planning permission was granted on windfall sites for an area totalling 72.27 ha. From the 72.27 ha, 22.77 ha (32%) of it was on previously developed land, with 48.22 ha (67%) on greenfield sites and 1.28 (2%) ha on sites containing a mixture of greenfield and previously developed land.

Figure 4 shows the distribution of windfall development permitted across the settlement hierarchy and the amount (area hectares) of which was on previously developed land / greenfield sites.

The results shown in Figure 4 demonstrate that the distribution of windfall development permitted across the settlement tier is consistent with the settlement strategy and Policy SP6 for all tiers of the settlement hierarchy except the Open Countryside.

The area of windfall development permitted in the Open Countryside (greenfield and previously developed land) accounts for 80% of the total area of windfall development permitted.

Looking at the results against the monitoring target for this indicator “**The majority of windfall development permitted is on greenfield land located outside the development boundaries of Towns and Large Villages**” it can be seen that **60% of windfall development is located on greenfield land outside of the development boundaries** of Towns and Large Villages with the majority being in the Open Countryside tier of the hierarchy. This is higher than the percentage recorded in the previous two monitoring periods, AMR 2021: 45% and AMR 2020: 56%).

Figure 5 is annotated to understand what type of developments (land uses) have been permitted on greenfield land in the open countryside. The value used to calculate the percentage is the area (ha) permitted to be consistent with the data above. It is worth noting that these figures include the conversion of agricultural buildings.

Figure 5 shows that tourism developments accounted for 61% of the area permitted on greenfield land in the Open Countryside. The applications permitted covered an area totalling 26.39 ha, consisting of 71 separate applications for 210 individual units of accommodation (these include bell tents, glamping pods, cabins and traditional holiday lets). The results are consistent with the findings from the previous AMRs and the Monitoring Review; however, it is noticeable that the applications permitted in this monitoring period are generally for smaller schemes (e.g., AMR 2021 recorded 346 units of accommodation over 76 planning applications). Consideration is given in monitoring indicator AMR37 on how these planning permissions accord with the policies in the LDP.

Figure 5 also demonstrates that residential developments accounted for 19% of the area permitted on greenfield land in the Open Countryside. Looking at the data in detail 48% of those permitted were for barn conversions and 40% were for rural enterprise dwellings. Both the conversion of agricultural buildings to residential use and rural enterprise dwellings are permitted through National planning policy.

The results for this monitoring period show that the majority of windfall development is permitted on greenfield land located outside the development boundaries of Towns and Large Villages. This means that the trigger point has been breached however initial analysis suggests that these developments accord with LDP and National Policy.

It is also worth remembering that the Plan area is one of the most rural areas in Wales. The total Plan area equates to approximately 430,301 ha, of which only 3,054 ha is within the development boundaries of settlements (less than 1% of the total area). The results from this indicator reflect the characteristics of the area and the wider needs of the economy and population.

Figure 4. Chart Showing the Location of Windfall Development Permitted in Hectares across the Settlement Hierarchy by Previously Developed Land / Greenfield Land.

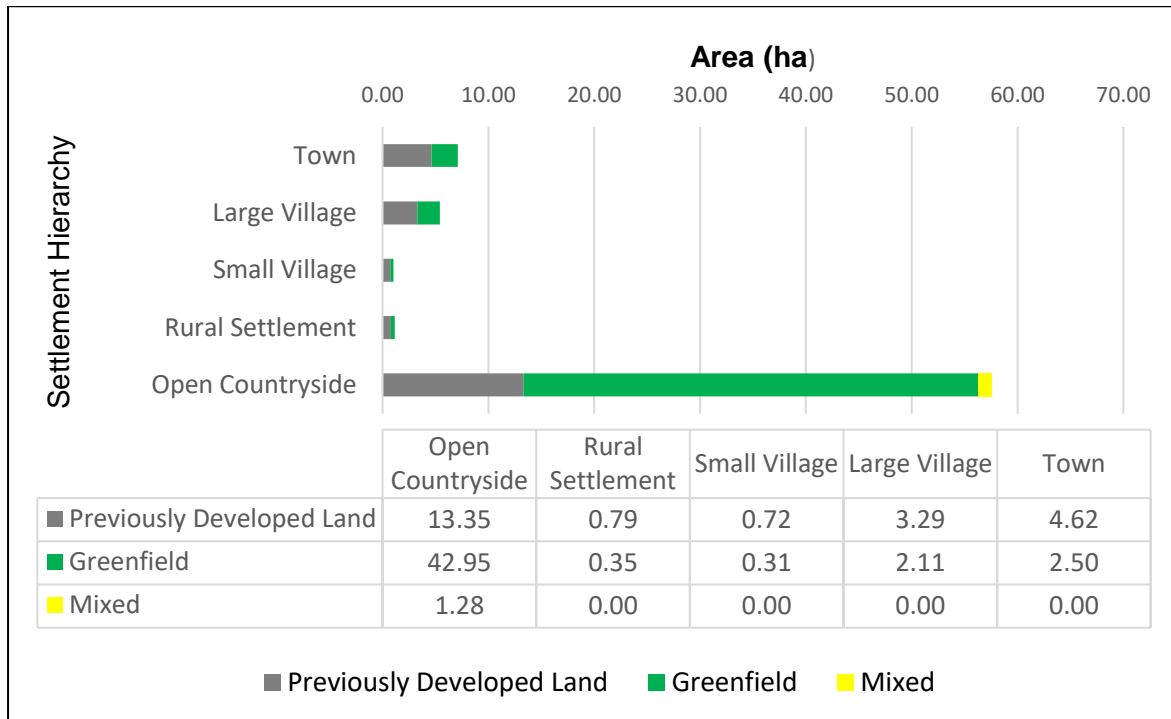
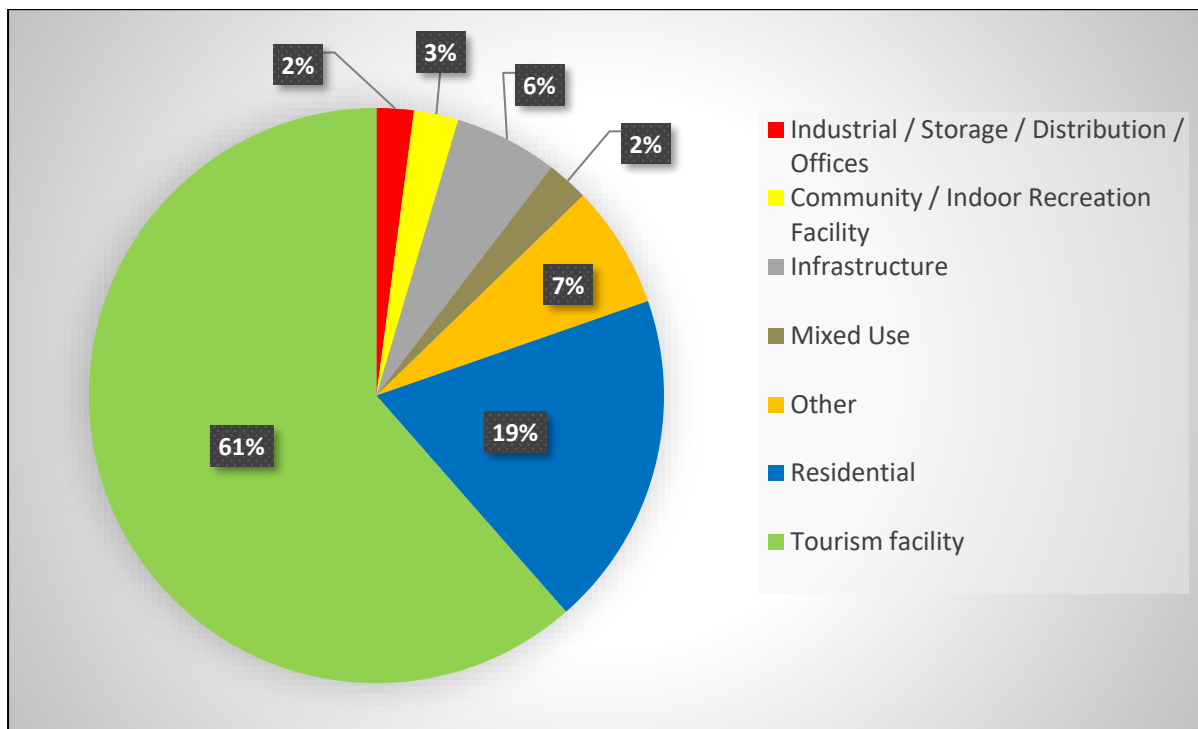


Figure 5. Chart Showing Percentage of Area Permitted for Different Development Proposals on Greenfield Land in the Open Countryside.



Action

Further Investigation/Research Required

Look at evidence regarding sustainable development and economic benefits to inform the strategy and policies of the Replacement LDP.

AMR21: The average overall density (units per hectare) permitted in respect of housing developments in Towns, Large Villages, Small Villages and Rural Settlements.

Objective:	Efficient Use of Land
Indicator:	The average overall density (units per hectare) permitted in respect of housing developments in Towns, Large Villages, Small Villages and Rural Settlements.
Key Policies:	Topic Based Policy H4 – Housing Density
Related Policies:	
Target:	For the average overall density of housing permitted on sites to accord with the guide ranges set out in Policy H4 in respect of: <ul style="list-style-type: none"> • Towns and Large Villages - 27 units per hectare. • Small Villages – 20-25 units per hectare. • Rural Settlements – 10-15 units per hectare.
Trigger Point:	The average overall density of housing developments permitted within each settlement category falls below the targets for each settlement type in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the density of development achieved on developments permitted across the settlement tiers. It is designed to test the implementation of LDP Policy H4 and specifically the guide ranges for density set out within the Policy. Developments permitted at lower densities than those specified in the Policy indicate less efficient use of land. However, as stated in LDP Policy H4, densities may be varied where justified by evidence of local circumstances or constraints.

The monitoring results for the average density of development for each settlement tier/development type are set out against the guide ranges in Table 23. The results show that the average density of developments permitted in Towns, at 28 dwellings per ha, continues to be in line with the guide of at least 27 dwellings per ha set out within policy. The results continue to show that densities achieved in Large Villages are lower than expected, however the density of smaller scale development in Small Villages and Rural Settlements, along with single dwellings, is starting to meet policy expectations.

Eight developments within Towns, involving change of use, redevelopment or infill, had exceeded the density guidelines during this monitoring period. However, three developments had not achieved the density guidelines, including an affordable housing development adjacent to Montgomery where a lower density of 21 dwellings per ha was permitted, as existing pond and hedgerow features, proposed wildlife corridors and provision for sustainable drainage reduced the developable area. Another development involved an LDP housing allocation at Ystradgynlais, where a slightly lower density of 25 dwellings per ha was accepted due to the site topography, sustainable drainage and

provision of visitor car parking. The other case involved a development of two dwellings on a site where three dwellings would have been expected to meet density guidelines, however part of the land was subject to a covenant prohibiting development within 10 metres of a neighbouring property, which substantially reduced the amount of land available for development.

The density for four out of the five housing developments permitted in Large Villages fell below the density guidelines. A lower density of 18 dwellings per ha was accepted on a development of 17 dwellings at Bronllys for various reasons, including provision of additional public open space, existing play area, public rights of way, trees and hedgerows, sustainable drainage, and the provision of two bungalows. A development of four dwellings, rather than five dwellings, at a density of 14 dwellings per ha was permitted at Four Crosses due to an acoustic barrier and low-density character of the surroundings. A reduced density of 19 dwellings per ha was permitted on a site at Forden involving nine dwellings, instead of the expected 14 dwellings, due to surface water flooding affecting parts of the site and local character. Another permission for 23 dwellings on an LDP Housing Allocation at Forden proposed a reduced density of 22 dwellings per ha, which was accepted due to part of the site area taken up by an attenuation pond and package treatment plant.

Developments permitted in Small Villages during this monitoring period involved single market dwellings, with two cases involving conversions where higher densities were achieved due to the limited plot size. The other two cases involved single plot developments where lower densities on large plots have been accepted based on the character of the area.

All three developments permitted in Rural Settlements benefited from extant planning permissions and, therefore, density could not be re-considered at this stage.

The results for this monitoring period show improvement in the regard given to density of development in the lower tier settlements. However, the trend for lower densities in Large Villages continues. It appears from the analysis of planning applications that, in addition to site specific constraints, the local context of sites within Large Villages is being given substantial weight in decision-making. This reflects the existing low-density character of Large Villages, compared to Towns where there may be more scope to achieve higher densities from conversion or infill opportunities.

The trigger for this indicator continues to be reached in respect of Large Villages, and, therefore, there is a continuing need for further investigation/research to inform the approach towards housing density across settlement tiers and development types, as part of the Replacement LDP process. This approach will need to take account of national planning policy aims around density set out within Future Wales, which expects new developments in urban areas to have a density of at least 50 dwellings per hectare.

Table 23. Average Density of Development Permitted by Settlement Tier / Development Type during Monitoring Period.

Settlement tier / development type	Average density (dwellings per ha)	Guide range
Town	28	27+
Large Village	16	27+
Small Village	19	20-25
Rural Settlement	10	10-15
Single dwellings	15	10-15

Action

Further Investigation/Research Required

Looking at the approach towards housing density across settlement tiers and development types.

AMR22: Amount of permanent, sterilising development permitted within a minerals safeguarding area.

Objective:	Efficient Use of Land
Indicator:	Amount of permanent, sterilising development permitted within a minerals safeguarding area.
Key Policies:	Development Management Policy DM8 – Minerals Safeguarding
Related Policies:	
Target:	No permanent, sterilising development to be permitted within a minerals safeguarding area, unless in accordance with Policy DM8.
Trigger Point:	1 or more developments permitted for permanent, sterilising development, within a minerals safeguarding area not in accordance with Policy DM8, in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The aim of this indicator is to test the effectiveness of LDP Policy DM8 - Minerals Safeguarding. The policy states that Minerals Safeguarding Areas have been designated for deposits of sand and gravel, sandstone, limestone, igneous rocks and surface coal, and these areas are shown on the LDP Proposals Map in accordance with national policy requirements. Defining such areas does not imply any presumption that they will be worked but merely aims to ensure they remain available as and when future generations may need to access them.

During the monitoring period (1st April 2021 to 31st March 2022), 161 applications were permitted within or partially overlapping a Mineral Safeguarding Area. Of the 161 applications, 52 did not discuss compliance with LDP Policy DM8 in the Officer's report.

Of the 52 proposals, 49 were for proposals considered not to have any impact, examples include the conversion or redevelopment of existing buildings, minor extensions to existing buildings or proposals for the siting of camping pods and static caravans. For the remaining three applications, in all instances the identification of the Mineral Safeguarding Area as a constraint had been missed. This does not necessarily mean that the development proposal did not comply with LDP Policy DM8, but that it had not been given consideration.

Measures were put in place, at the start of 2021, to ensure that Minerals Safeguarding Areas are captured as a constraint consistently. This has resulted in a marked improvement in the performance of monitoring indicator AMR22 in this annual monitoring report, compared to in AMR 2021. The three applications where the Mineral Safeguarding Area was missed as a constraint are applications validated before the measures were put in place.

Due to the improvements seen with this monitoring indicator, it is recommended that monitoring continues for a further year, the situation has now progressed towards development plan policies being implemented effectively.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 4 – Climate Change and Flooding

To support the transition to a low carbon and low waste Powys through all development, including the reduction of waste to landfill and by directing development away from high flood risk areas and, where possible, to reduce or better manage existing flood risk for communities, infrastructure and businesses.

Objective 4 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR24	The preparation and adoption of Supplementary Planning Guidance relating to Land Drainage.		Not Assessed
AMR25	Number of waste developments permitted on: a) employment allocations listed under Policy E1; b) within development boundaries; c) in open countryside.		Continue Monitoring

AMR24: The preparation and adoption of Supplementary Planning Guidance relating to Land Drainage.

Objective:	Climate Change and Flooding
Indicator:	The preparation and adoption of Supplementary Planning Guidance relating to Land Drainage.
Key Policies:	Development Management Policy DM6 – Flood Prevention Measures and Land Drainage
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance relating to Land Drainage within 24 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Land Drainage not adopted within 24 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Land Drainage Supplementary Planning Guidance (SPG) was due for adoption by 17th April 2020, but it has been deferred whilst it awaits confirmation from the SUDS Approval Body (SAB) and Lead Local Flood Authority (LLFA), who have overall responsibility for land drainage. Whilst the LDP included a commitment to produce a Land Drainage SPG, it should be noted that the SAB process was introduced after the LDP was adopted. The Land Drainage SPG has been prepared and consulted upon, but SAB input is now required before the SPG can be progressed to adoption.

A revised TAN15 is due to be published which will revoke the use of the Development Advice Maps. The final Land Drainage SPG will need to align with National policy including a revised TAN15 when published.

Action

Not Assessed

AMR25: Number of waste developments permitted on:
a) employment allocations listed under Policy E1;
b) within development boundaries;
c) in open countryside.

Objective:	Climate Change and Flooding
Indicator:	Number of waste developments permitted on: a) employment allocations listed under Policy E1; b) within development boundaries; c) in open countryside.
Key Policies:	Topic Based Policy W1 – Location of Waste Development
Related Policies:	
Target:	No waste developments permitted in open countryside, unless in accordance with Policy W1.
Trigger Point:	1 or more waste developments permitted in open countryside not in accordance with Policy W1.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The purpose of this monitoring indicator is to identify those instances where the LDP is used to permit waste developments in the Open Countryside.

LDP Policy W1 aims to focus and support the location of waste development proposals either within the employment sites identified in LDP policies E1 and E4 or within the defined development boundaries of Towns and Large Villages. It goes on to describe the five criteria that would need to be met before such developments would be permitted in the open countryside. This indicator therefore aims to test the efficacy of these five criteria in protecting the open countryside from inappropriate developments.

During the monitoring period there were no planning applications for waste development proposals permitted in the Plan area.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 5 – Energy and Water

To support the conservation of energy and water and to generate energy from appropriately located renewable resources where acceptable in terms of the economic, social, environmental and cumulative impacts.

In particular, to:

Contribute to the achievement of the Water Framework Directive targets in Powys.
Deliver the county’s contribution to the national targets for renewable energy generation.

Objective 5 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR26	Additional installed capacity (MW) of wind turbine developments permitted within SSAs per annum.	N/A	N/A
AMR27	Additional installed capacity (MW) of solar PV developments permitted within LSAs per annum.		Policy Review Required
AMR28	Number of community/district heating schemes permitted under Policy DM13 (criterion 15) per annum.		Policy Review Required
AMR29	Additional installed capacity (MW) renewable, low or zero carbon electricity permitted per annum. Additional installed capacity (MW) of renewable, low or zero carbon thermal permitted per annum.		Continue Monitoring
AMR30	The preparation and adoption of Supplementary Planning Guidance relating to Renewable Energy.	SPG adopted	No Action Required
AMR31	Number of developments permitted for wind and solar PV energy greater than 5MW.		Continue Monitoring

AMR26: Additional installed capacity (MW) of wind turbine developments permitted within SSAs per annum.

Objective:	Energy and Water
Indicator:	Additional installed capacity (MW) of wind turbine developments permitted within SSAs per annum.
Key Policies:	Topic Based Policy RE1– Renewable Energy
Related Policies:	
Target:	To contribute towards achieving the TAN 8 SSA capacity targets
Trigger Point:	No additional installed capacity of wind turbine developments permitted within SSAs for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	N/A
AMR 2022 (2021-2022):	N/A

Analysis

This is no longer an indicator. Technical Advice Note (TAN) 8, Strategic Search Areas (SSAs) have been replaced by pre-assessed areas for wind energy in Future Wales: The National Plan 2040 (Feb 2021).

Action

N/A

AMR27: Additional installed capacity (MW) of solar PV developments permitted within LSAs per annum.

Objective:	Energy and Water
Indicator:	Additional installed capacity (MW) of solar PV developments permitted within LSAs per annum.
Key Policies:	Topic Based Policy RE1– Renewable Energy
Related Policies:	
Target:	For contributions to be made towards renewable energy generation through new solar developments permitted within LSAs.
Trigger Point:	No additional installed capacity of solar PV developments permitted within LSAs for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The aim of this monitoring indicator is to monitor how effective LDP Policy RE1 is at ensuring proposals for solar PV between 5 and 50MW are focused within the LDP's designated Local Search Areas (LSA).

The LDP identified 20 LSA across the county. These have been identified as areas within Powys that are considered to contain the least constraint for medium to larger scale solar photovoltaic renewable electricity generation projects.

In this monitoring period there has been no additional installed capacity permitted within any of the 20 LSA in the Plan area.

The absence of any Solar PV planning permissions being granted within the identified LSAs for this monitoring period and over the course of more than two consecutive years, means the monitoring indicator's trigger point has been reached.

However, it is recognised that it may be economic factors, such as changes to subsidy regime and inability to obtain cost effective connections to grid, rather than the policy which may be controlling factors. Further evidence gathering, allied to a policy review may be necessary.

The trigger point for this monitoring indicator has been reached, no additional installed capacity of solar PV developments has been permitted within LSAs for more than two consecutive years. Research will be undertaken as evidence to support the preparation of the Replacement LDP, this will include reconsidering the policies and proposals with regards to renewable energy including the use of LSAs.

Action

Policy Review Required

Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.

AMR28: Number of community/district heating schemes permitted under Policy DM13 (criterion 14) per annum.

Objective:	Energy and Water
Indicator:	Number of community/district heating schemes permitted under Policy DM13 (criterion 14) per annum.
Key Policies:	Development Management Policy DM13 – Design and Resources (Criterion 14)
Related Policies:	
Target:	For additional community/district heating schemes to be permitted under Policy DM13 (criterion 14)
Trigger Point:	No additional community/district heating schemes permitted under Policy DM13 (criterion 14) for two consecutive years.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator seeks to test the performance of Criterion 14 of Policy DM13, in supporting the development of community/district heating schemes. The criterion requires that investigations are “undertaken into the technical feasibility and financial viability of community and/or district heating networks wherever the development proposal’s Heat Demand Density exceeds 3MW/km²”.

Community or District Heating Networks work on the principle of a shared network of heating pipes that heat one or more buildings, usually in heavily populated or urban areas, where there is a reliable or near constant demand. They usually involve one heat source and heavily insulated pipes running underground between the properties involved. In European towns and cities where the technology is relatively common, they usually involve a Combined Heat and Power (CHP) or a Combined Cooling Heat and Power (CCHP) plant. These utilise the excess heat that is created by the generation of electricity. The electricity is either used by the building/s that are a part of the network or is sold to the National Grid. The CHP/CCHP generators themselves can use a variety of fuels from diesel through to biomass and so are considered to be either low carbon or completely renewable.

As with the previous AMR (AMR 2021) no such applications have been permitted within the monitoring period, either involving a scale, or in a location, that is likely to be feasible or viable. In considering how effective this part of the policy is a number of factors need to be borne in mind when interpreting this outcome.

The policy requires the developer to carry out an investigation in order to determine whether the use of such a network is financially and technically viable. Where it is found that a scheme is not feasible and/or viable there is no requirement that they must implement one. No such investigations are recorded in the Council’s monitoring activities

so it has not been possible to know how many proposals undertook this investigation and then discounted it due to it not being feasible or viable.

Also, it is recognised that district heating networks are only likely to be feasible and viable where the proposal involves a high enough demand (e.g., a (usually urban) residential setting such as a block of flats, a hospital, or residential home, public swimming pool, or leisure centre etc.) and/or is in proximity to other similar users that require a regular or high thermal demand. Therefore, the opportunity to permit such a scheme relies entirely upon there being applications from appropriate settings in the first place, followed by those applications establishing the feasibility and viability of such a network. Hence the lack of any permitted scheme may not point to a failing in the policy, but wider factors such as the number, scale and locations of applications in the first place.

Research will be undertaken as evidence to support the preparation of the Replacement LDP, this will include reconsidering the policies and proposals with regards to renewable energy including community/district heating schemes.

Action

Policy Review Required

Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.

AMR29:

Additional installed capacity (MW) renewable, low or zero carbon electricity permitted per annum.

Additional installed capacity (MW) of renewable, low or zero carbon thermal permitted per annum.

Objective:	Energy and Water
Indicator:	Additional installed capacity (MW) renewable, low or zero carbon electricity permitted per annum. Additional installed capacity (MW) of renewable, low or zero carbon thermal permitted per annum.
Key Policies:	Topic Based Policy RE1– Renewable Energy
Related Policies:	Development Management Policy DM13 – Design and Resources
Target:	<ul style="list-style-type: none"> • Additional installed capacity of renewable low or zero carbon electricity permitted of 30.85MW (potential electricity contribution) by 2021. • Additional installed capacity of renewable low or zero carbon electricity permitted of 61.7MW (potential electricity contribution) by 2026. • Additional installed capacity of renewable, low or zero carbon thermal permitted of 3.5MW (potential thermal contribution) by 2021. • Additional installed capacity of renewable low or zero carbon thermal permitted of 87MW (potential thermal contribution) by 2026. <p>The amount of additional installed capacity of renewable low or zero carbon permitted falls below the potential electricity or thermal contribution.</p>
Trigger Point:	The amount of additional installed capacity of renewable low or zero carbon permitted falls below the potential electricity or thermal contribution.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to monitor the effectiveness of LDP Policy RE1 in contributing towards achieving the national targets detailed in the reasoned justification for Policy RE1.

Policy RE1 of the LDP is supported by the Powys Renewable Energy Assessment (REA) Update (2017) which identified the amounts of renewable, low or zero carbon electricity and thermal energy that the county could be reasonably expected to contribute towards the national targets. For electricity the different sources listed in the REA (Biomass, Hydropower, Landfill Gas, Windpower, Solar PV, Anaerobic Digestion, Combined Heat

and Power and Building Integrated Renewables) were likely to contribute an additional 61.7MW capacity to what already exists, before the end of the Plan period in 2026.

During the previous monitoring periods (17th April 2018 to 31st March 2019, 1st April 2019 to 31st March 2020, 1st April 2020 to 31st March 2021), a total of 36.7311 MW of renewable, zero or low carbon electricity generation capacity was permitted in the Plan area, and a total of 20.069MW of renewable or low carbon thermal capacity was added.

Analysis of the Council's data for the monitoring period 1st April 2021 to 31st March 2022 determined that there was an additional 1.433MW of renewable, zero or low carbon electricity generation capacity permitted, along with a further 1.393MW of thermal capacity.

When added to the previous year's totals the cumulative figures, almost four years after adoption of the LDP, are now as follows;

- Electricity; 38.164MW
- Thermal; 21.462MW

With less than 24MW now required in order to meet the Plan's lifetime target, the policy is expected to have permitted the anticipated 61.7MW by the end of the Plan period. The figures for thermal capacity are even better, as the target of 7MW by the end of the Plan period in 2026 has already exceeded the target.

Not included in the reported figures above, it should be noted that an application for a windfarm at Llanbrynmair consisting of 30 wind turbines (up to 90MW) was approved by the Secretary of State in December 2021 (BERR/2009/0004).

As a result of this performance there is no further action required and the performance of LDP Policy RE1 will continue to be monitored.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR30: The preparation and adoption of Supplementary Planning Guidance relating to Renewable Energy.

Objective:	Energy and Water
Indicator:	The preparation and adoption of Supplementary Planning Guidance relating to Renewable Energy.
Key Policies:	Topic Based Policy RE1– Renewable Energy
Related Policies:	Development Management Policy DM13 – Design and Resources
Target:	To prepare and adopt Supplementary Planning Guidance relating to Renewable Energy within 12 months of adoption of the Plan.
Trigger Point:	The SPG relating to Renewable Energy is not adopted within 12 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted April 2019.
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Renewable Energy SPG was adopted in April 2019.

Action

No action required.

AMR31: Number of developments permitted for wind and solar PV energy greater than 5MW.

Objective:	Energy and Water
Indicator:	Number of developments permitted for wind and solar PV energy greater than 5MW.
Key Policies:	Topic Based Policy RE1– Renewable Energy
Related Policies:	
Target:	No developments permitted, unless the size and location is in accordance with criteria 1 and 2 of Policy RE1.
Trigger Point:	1 or more developments permitted of a size (MW) and location not in accordance with criteria 1 and 2 of Policy RE1.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

Criteria 1 and 2 of LDP Policy RE1 are concerned with ensuring that the Strategic Search Areas (SSA) for renewable wind developments, and Local Search Areas (LSA) for solar PV developments, accommodate renewable energy developments of an appropriate size (25MW and upwards for wind and between 5MW and 50MW for solar). However, due to the introduction of Future Wales – The National Plan 2040 (February 2021) and the subsequent withdrawal of TAN 8 – Planning for Renewable Energy, the SSA designation no longer exists. As a result, from this point onwards, this monitoring indicator is concerned only with the monitoring of Criterion 2 of LDP Policy RE1.

Criterion 2 safeguards the 20 LSAs in the Plan area by ensuring that the Areas are not sterilised by other renewable, low or zero carbon developments that would be incompatible with the purpose of the LSA. Such incompatible developments would include solar developments under 5MW in an LSA if their presence created an unacceptable cumulative impact that would render the LSA unavailable to larger scale developments for which the Area has been designated.

Analysis of the Development Management data for the monitoring period reveals that for developments impacting on a LSA, one application was permitted. This being a Section 73 application at Bryn Henllys Open Cast Mine Site (21/0117/REM) to extend the operational life from 25 years to 40 years.

Monitoring of compliance will continue.

Action

Continue Monitoring - Development plan policies are being implemented effectively.

Theme 2 – Supporting The Powys Economy

Objective 6 – Vibrant Economy

To support a diverse, robust and vibrant economy for Powys, including a strong rural economy, which is sustainable and responsive to change. To ensure towns and larger villages are the main focus for economic development and that town centres are vital, viable and attractive.

Objective 6 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR32	Amount of major retail, office and leisure development (sq.m.) permitted within and outside Town Centre Areas.		Continue Monitoring
AMR33	The number of developments permitted for new economic development on allocated employment and mixed-use sites in respect of business (B1), general industry (B2), storage and distribution (B8) multiple uses, ancillary uses, and other uses		Continue Monitoring
AMR34	Number of employment developments permitted on non-allocated sites.		Continue Monitoring
AMR35	Number of developments permitted for alternative use of existing employment sites listed under Policy E4.		Continue Monitoring
AMR36	Number of developments permitted within Town Centres, which would result in less than: 75% of units within a Primary Shopping Frontage; 66% of units within Secondary Shopping Frontage; being for A1 and A3 uses.		Policy Review Required

AMR32: Amount of major retail, office and leisure development (sq.m.) permitted within and outside Town Centre Areas.

Objective:	Vibrant Economy
Indicator:	Amount of major retail, office and leisure development (sq.m.) permitted within and outside Town Centre Areas.
Key Policies:	Topic Based Policy E2 – Employment Proposals on Non-allocated Employment Sites
Related Policies:	Topic Based Policy TD1 –Tourism Developments
Target:	No major retail, office or leisure development to be permitted outside Town Centre Areas, unless in accordance with national policy, TAN 4, or LDP policies E2 and TD1.
Trigger Point:	1 or more major retail, office or leisure developments permitted outside Town Centre Areas not in accordance with national policy, TAN 4, or LDP policies E2 and TD1 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to test the implementation of LDP policies E2 and TD1 to ensure that major retail, office or leisure development is located only within town centre areas unless it complies with National Policy, TAN 4, or LDP policies E2 and TD1.

LDP policy supports small scale, appropriate development opportunities for employment in areas that are not allocated for such purposes. Any applications received that do not accord with the relevant criteria set out within the policies would be contrary to policy.

During the monitoring period, there were three applications for major development permitted that fell within the categories of retail, office or leisure outside of Town Centre Areas. All three of the applications were for tourism developments and considered to comply with LDP Policy TD1.

It is considered that the development plan policies are being implemented effectively with regards to this monitoring indicator.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR33: The number of developments permitted for new economic development on allocated employment and mixed use sites in respect of business (B1), general industry (B2), storage and distribution (B8) multiple uses, ancillary uses, and other uses.

Objective:	Vibrant Economy
Indicator:	The number of developments permitted for new economic development on allocated employment and mixed use sites in respect of business (B1), general industry (B2), storage and distribution (B8) multiple uses, ancillary uses, and other uses.
Key Policies:	Strategic Policy SP2 – Employment Growth
Related Policies:	Topic Based Policy E1 – Employment Proposals on Allocated Employment Sites Topic Based Policy E3 – Employment Proposals on Allocated Mixed Use Employment Sites
Target:	Employment uses within classes B1, B2 and B8, or ancillary uses, only to be permitted on allocated employment and mixed use sites, unless in accordance with policies E1 and E3.
Trigger Point:	1 or more other employment developments permitted on allocated employment and mixed use sites not in accordance with policies E1 and E3 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to test the implementation of LDP policies E1 and E3 to ensure that the allocations in the LDP continue to provide employment land across the Plan area.

LDP policy promotes the employment allocations (and some of the mixed-use allocations) for B1, B2 and B8 use classes, but also enables proposals for complimentary ancillary employment uses that are not within a B use class order that improve site viability and enables new site development. Any applications which do not comply with this criterion would be contrary to policy.

During the monitoring period, four planning applications (0.745 ha) were permitted for employment uses. The employment uses proposed for these sites, all complied with the permitted uses and category for the sites (Prestige, High Quality, Local and Mixed Use) in accordance with LDP policies E1 and E3, on sites allocated for employment land in the Plan.

Two further planning permissions were granted for infrastructure related proposals. One was for the provision of 189 car parking spaces for use by an existing company on the industrial park and the other was for the configuration of the access and white lining within the circulation route of an ancillary use previously permitted within the allocated site. Both proposals are considered to accord with LDP Policy E1.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR34: Number of employment developments permitted on non-allocated sites.

Objective:	Vibrant Economy
Indicator:	Number of employment developments permitted on non-allocated sites.
Key Policies:	Topic Based Policy E2 – Employment Proposals on Non-allocated Employment Sites
Related Policies:	
Target:	No employment development to be permitted on non-allocated sites, unless in accordance with Policy E2.
Trigger Point:	1 or more employment developments permitted on non-allocated sites not in accordance with Policy E2 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

A total of nine planning applications were permitted for employment proposals on non-allocated employment sites (not on an employment allocation or within an employment safeguarding area) during the monitoring period.

Figure 6 below, illustrates where the employment proposals were in terms of the settlement hierarchy and the nature of the development (e.g., conversion/change of use, extension or new build).

LDP Policy E2 requires development proposals on non-allocated sites to consider locations on existing employment sites or previously developed land in the first instance if an allocated employment site is not suitable. Following on from this the policy requires at least one of the following criteria to be met:

- The proposal is up to 0.5ha. and is located within or adjoining a settlement with a development boundary.
- The proposal is for the limited expansion, extension or environmental improvement of existing employment sites and buildings.
- The proposal is appropriate in scale and nature to its location and is supported by a business case which demonstrates that its location is justified.

All five of the proposals in the Towns and Large Villages were on previously developed sites within a settlement so can automatically be considered as complying with LDP Policy E2.

The remaining four proposals in the Open Countryside were granted due to compliance with the policies listed in Table 24.

Table 24 identifies one employment development permitted on a non-allocated site that was not necessarily in accordance with LDP Policy E2 but was in accordance with National Policy. In this case, the lack of accordance with LDP Policy E2 is therefore seen as an issue with the wording of this annual monitoring framework, monitoring indicator target and trigger point not the way that the planning application was determined.

Figure 6. Chart Showing the Number of Planning Applications Permitted on Non-Allocated Employment Sites by Settlement Hierarchy and Development Type in Monitoring Period.

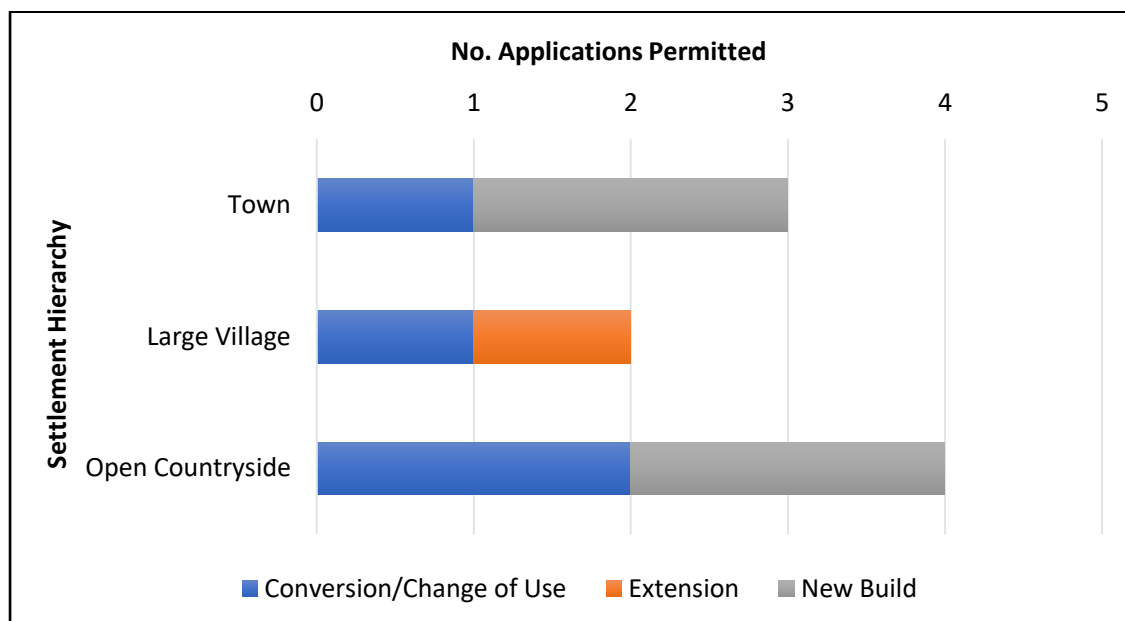


Table 24. Applications Permitted in Monitoring Period, for Employment Developments on Non-Allocated Sites in the Open Countryside Against LDP Policy.

Application	Principle of Development	Policy Accordance
21/0552/FUL	Erection of a building to house bottling plant, alterations to access and all associated works	LDP Policy E2 (criterion 2)
21/0653/FUL	Siting of up to 10 self-storage containers on existing areas of hardstanding within a secure compound including erection of new 2.4 m high fence and gates and alterations to existing access	LDP Policy E2 (criterion 2)
21/0910/FUL	Retrospective application for the change of use of an agricultural workshop building to B1(C) (business - light industrial)	TAN 23, part 3.2.1
21/1085/FUL	Change of use of existing hotel to accommodate a mixed use of hotel and furniture workshop with associated retail space	LDP Policy E2 (criterion 3)

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR35: Number of developments permitted for alternative use of existing employment sites listed under Policy E4.

Objective:	Vibrant Economy
Indicator:	Number of developments permitted for alternative use of existing employment sites listed under Policy E4.
Key Policies:	Topic Based Policy E4 – Safeguarded Employment Sites
Related Policies:	Development Management Policy DM16 – Protection of Existing Employment Sites
Target:	No developments permitted for alternative use of existing employment sites listed under Policy E4 unless in accordance with Policy DM16.
Trigger Point:	1 or more developments permitted for alternative use of existing employment sites listed under Policy E4 not in accordance with Policy DM16 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to test the implementation of LDP policies E4 and DM16 to ensure that the safeguarded employment sites in the LDP continue to protect the function of existing employment areas across the Plan area.

LDP Policy DM16 only allows for alternative uses on safeguarded employment sites where proposals can demonstrate that the employment site is no longer required, that the proposal would not result in an under provision of employment land or premises and that the development proposal doesn't prejudice the surrounding employment sites and premises.

During the monitoring period all apart from two of the planning applications for non-employment uses permitted, on employment safeguarding sites, were to complement (not replace) the existing employment use (e.g., addition of use class A1 retail to current use class B1).

The two planning applications for non-employment uses permitted, fall within the definition of ancillary employment uses in paragraph 4.4.4 of the LDP. The proposals included a day nursery and a grocery shop both of which could be considered to improve site viability. Furthermore, both applications met the criteria set out in LDP Policy DM16, in that the land and premises were no longer required for employment purposes, they would not result in an under provision of employment land or premises in the sub / local area or prejudice the existing or future operational use of surrounding employment sites and premises.

Therefore, no applications were permitted for an alternative use of an employment safeguarding site that did not comply with the LDP employment policies.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR36: Number of developments permitted within Town Centres, which would result in less than:

- 75% of units within a Primary Shopping Frontage;
- 66% of units within Secondary Shopping Frontage;

being for A1 and A3 uses.

Objective:	Vibrant Economy
Indicator:	Number of developments permitted within Town Centres, which would result in less than: <ul style="list-style-type: none"> • 75% of units within a Primary Shopping Frontage; • 66% of units within Secondary Shopping Frontage; being for A1 and A3 uses.
Key Policies:	Topic Based Policy R3 – Development Within Town Centre Areas
Related Policies:	
Target:	No development permitted that results in less than the percentage of units set by Policy R3 for the respective Shopping Frontages being for A1 and A3 uses, unless in accordance with Policy R3.
Trigger Point:	1 or more developments permitted that result in less than the percentage of units set by Policy R3 for the respective Shopping Frontages being for A1 or A3 uses not in accordance with Policy R3, in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

As set out in AMR 2021, this monitoring indicator is no longer being actively monitored due to problems with the baseline data, meaning the % targets are ineffective. It has been determined that the retail suite of policies will need to be updated for the Replacement LDP.

The Council has now commissioned settlement audits for the Replacement LDP which will include consideration of the retail mix in Towns and Large Villages, this will be supplemented by further retail evidence. Planning Policy evidence for the Replacement LDP will need to be aligned to ongoing regeneration work (such as the forthcoming Town Centre Investment Plans which will relate to ten towns in Powys) and have regard to the retail element of any adopted Place Plans.

Table 25 shows the permissions granted in the monitoring period which are relevant to the change of units within Primary or Secondary Frontages (note that Secondary frontages are only defined for Welshpool and Newtown). The decisions are policy compliant taking account of LDP Policy R3.

Table 25. Applications Permitted in the Monitoring Period for Change of Use in Primary or Secondary Retail Zones.

Town	Frontage	Permission	Detail
Builth Wells	Primary	20/0707/FUL	20 High Street: Change of use of ground floor from library to retail to include rear extension and access to flats above, change of use of first floor from library to two flats and creation of two new flats on second floor
Welshpool	Primary	21/0484/FUL	17 Berriew Street: Change of use of 1 st floor hairdressers and partial change of use of neighbouring 1 st floor retail floor space into a residential flat
Ystradgynlais	Primary	21/1707/FUL	24 Station Road: Change of use of property from a Chiropractic Clinic to a Chiropractic Clinic on the ground floor and self-contained flat on the first floor
Newtown	Secondary	21/1316/FUL	7a Market Street: Change of use of basement flat to shop storage area
Newtown	Secondary	21/1722/FUL	31 Market Street (extending over 30 Market Street and building to rear of no.31): Change of use and conversion of offices to create six residential units and retail floor space.

Action

Policy Review Required

Whilst the principles of LDP Policy R3, to retain vital, viable and attractive town centres, are being adhered to, the Monitoring Indicator and Trigger point is not able to be used effectively and should be reviewed. This will take place as part of the Replacement LDP.

Objective 7 – Key Economic Sectors

To maintain and strengthen key economic sectors within Powys including manufacturing in the Severn Valley and Ystradgynlais, sustainable year-round tourism opportunities, agriculture and the rural economy.

Objective 7 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR37	Number of new tourism facilities, attractions or extensions to existing development permitted.		Continue Monitoring
AMR38	Number of developments permitted for alternative use of existing tourism development in rural areas.		Continue Monitoring

AMR37: Number of new tourism facilities, attractions or extensions to existing development permitted.

Objective:	Key Economic Sectors
Indicator:	Number of new tourism facilities, attractions or extensions to existing development permitted.
Key Policies:	Topic Based Policy TD1 – Tourism Development
Related Policies:	
Target:	No developments permitted for new tourism facilities or attractions or for extensions to existing development, unless in accordance with Policy TD1.
Trigger Point:	1 or more developments permitted for new tourism accommodation, facilities or attractions, or for extensions to existing development not in accordance with Policy TD1 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The purpose of this indicator is to ensure that tourism development is in accordance with LDP Policy TD1 and that inappropriate, unacceptable development is not permitted either in settlements or the open countryside. Supporting tourism is a key tenet of the LDP because of its contribution to the economy, but the LPA seeks to ensure that developments are sustainable and do not have an unacceptable adverse impact and effect upon the character and appearance of an area, the natural and historic environment or existing amenities, assets or designations.

During this monitoring period, 92 applications for tourism development were given planning permission, all were in accordance with LDP Policy TD1 which indicates that the policy is being implemented appropriately.

Looking at the distribution of the tourism developments across the settlement hierarchy 95% of the applications permitted were in the Open Countryside and as seen in monitoring indicator AMR20, 71 of the total applications (77%) were on greenfield sites in the Open Countryside.

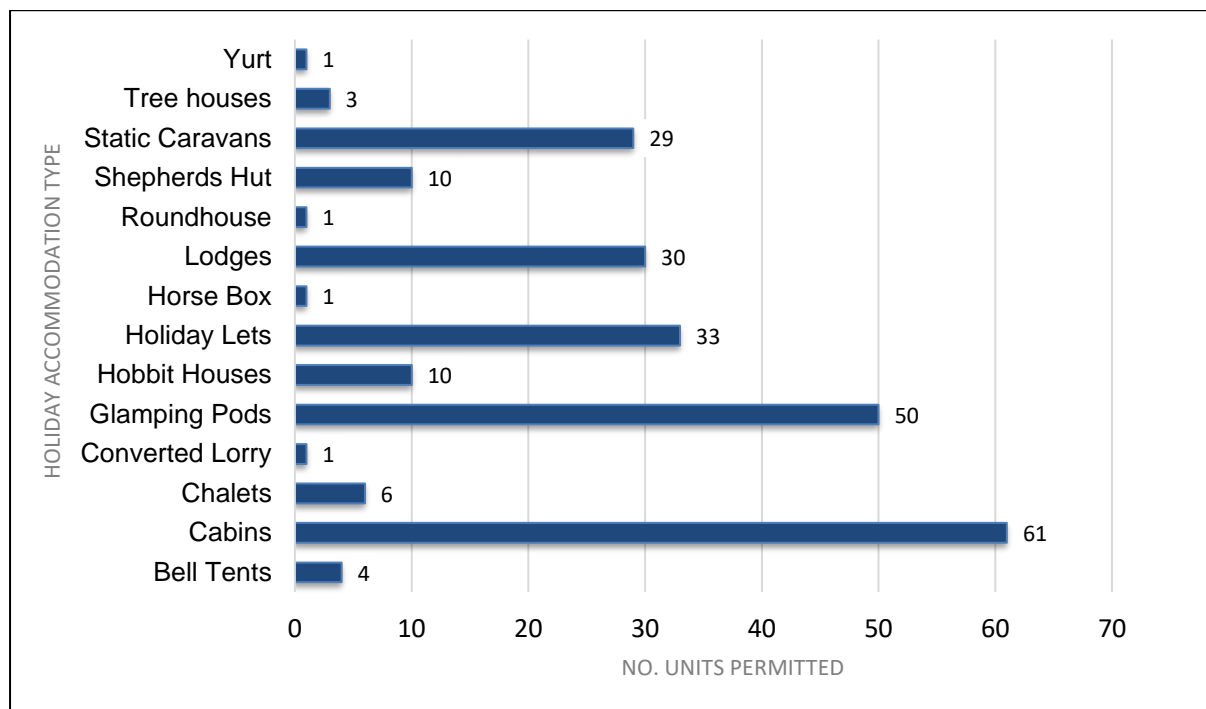
Analysis of the 92 planning applications permitted found that a total of 240 individual units of tourist accommodation were permitted. Figure 7 below breaks the 240 units into type, the biggest difference between the applications permitted in this monitoring period compared to previous years is the reduction in the number static caravans that received permission.

Four of the 92 planning applications for a tourism use, did not result in units of accommodation, these include proposals for minor development related to an existing facility and a campsite.

All 92 planning applications for tourism development permitted, were considered to comply with LDP Policy DM4 – Landscape. However, consideration will be given in the preparation of the Replacement LDP as to whether the Landscape Policy DM4, is

adequately worded in relation to tourism development, including any cumulative impacts and whether the wording of LDP Policy TD1 – Tourism Development needs to be amended.

Figure 7. Chart Showing the Total Type and Number of Units of Accommodation Permitted in the Monitoring Period.



Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR38: Number of developments permitted for alternative use of existing tourism development in rural areas.

Objective:	Key Economic Sectors
Indicator:	Number of developments permitted for alternative use of existing tourism development in rural areas.
Key Policies:	Topic Based Policy TD2 – Alternative Uses of Existing Tourism Development
Related Policies:	
Target:	No developments permitted for change of use of existing tourism developments to alternative uses in rural areas, unless in accordance with Policy TD2.
Trigger Point:	1 or more developments permitted for alternative (non-tourism) use of existing tourism developments in rural areas not in accordance with Policy TD2 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at developments that change the use of an existing tourism facility to some other use. Existing tourist accommodation, facilities and attractions in Powys make an important contribution to the local tourism and business economies and the LDP seeks to avoid any significant loss of such facilities in order to protect the economy of Powys which is heavily dependent on tourism.

During this monitoring period, seven applications were given consent that permitted a change of use from a tourism facility to another use. Five of these applications were located within the Open Countryside (rural areas).

Of the five applications permitted for the alternative (non-tourism) use of existing tourism developments in rural areas, one was for rural enterprise dwelling in association with an existing tourism business, so not considered to conflict with LDP Policy TD2. Two of the applications were supported by evidence in relation to the facility's viability and LDP Policy TD2 was properly considered and applied.

A further application was for the change of use of a holiday let, recently converted from a barn to a residential dwelling. In this instance the Officer considered LDP Policy TD2, but also recognised that TAN 6 and TAN 23 with regards to the conversion of rural buildings, applied in this instance.

The remaining application was for the conversion of a licensed guesthouse to a private dwelling. There was no viability evidence submitted to support the application and the Planning Officer gave limited consideration to compliance with LDP Policy TD2 in the Officer Report. However, the guesthouse had only had planning permission since 2012 prior to this it was a private dwelling.

Looking at the developments permitted for a change of use of an existing tourism development to an alternative use in rural areas, it is considered that they are all in accordance with LDP Policy TD2 or National Policy, apart from the final example.

However, in this case it is not considered to be an issue due to the property reverting to its previous use in a relatively short period of time.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 8 – Regeneration

To support the regeneration and renewal of Powys’ built environment, its historic towns and employment premises and to support regeneration activities such as the Powys Local Growth Zone initiative.

Objective 8 Local Indicators - Summary Table for Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR39	Employment development (ha) permitted and delivered within Powys Local Growth Zones.		This Local Indicator has been removed from the AMR due to the nature of the LGZ initiative and an absence of robust data.

Theme 3 – Supporting Infrastructure and Services

Objective 9 – Infrastructure and Services

To support the provision of new infrastructure and services to meet the future needs of Powys’ communities.

Objective 9 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR40	Number of major developments permitted where new or improved infrastructure has been secured through developer contributions.		Continue Monitoring
AMR41	Preparation and adoption of Supplementary Planning Guidance relating to Planning Obligations.	SPG Adopted	No Action Required

AMR40: Number of major developments permitted where new or improved infrastructure has been secured through developer contributions.

Objective:	Infrastructure and Services
Indicator:	Number of major developments permitted where new or improved infrastructure has been secured through developer contributions.
Key Policies:	Development Management Policy DM1 – Planning Obligations
Related Policies:	
Target:	For new or improved infrastructure to be secured through developer contributions in connection with developments permitted, where appropriate.
Trigger Point:	1 or more developments permitted not in accordance with Policy DM1 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

In the monitoring period, there were three applications for major development which secured infrastructure through developer contributions.

Planning permission: 21/0840/OUT - Outline application for residential development for 23 dwellings at land adjacent to Lyndale and Forden Church in Wales Primary School, Forden. The Section 106 secures a £20,000 contribution towards the cost of maintaining and repairing or replacement of existing play equipment and/or facilities in the locality of the site. The scheme also includes five affordable dwellings.

Planning permission: P/2009/0038 - 19/1642/REM - Outline: Residential development and creation of new vehicular access at site adjacent to Shirley, Ludlow Road, Knighton - P24 HA1. The Section 106 secures a £30,000 contribution towards the improvement of the Bryn-y-Castell playground. The scheme also includes two affordable dwellings.

Planning permission: P/2017/0200 – 21/0383/REM - Outline: Proposed residential development comprising of up to 42 no. dwellings at land adjacent to Llys Awel Pool Road, Llanfair Caereinion. The Section 106 secures an education contribution of £132,595.18 towards the cost of providing Early Years and Primary Education and Special Education Needs in Llanfair Caereinion (payable in two instalments in conjunction with the phasing of development).

This analysis demonstrates that LDP Policy DM1 continues to be used effectively. The Council also uses planning conditions, where appropriate, to further secure planning gain. The use of conditions has now become common in respect of securing on site Affordable Housing rather than through Section 106. Affordable Housing provision is therefore monitored separately.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR41: Preparation and adoption of Supplementary Planning Guidance relating to Planning Obligations.

Objective:	Infrastructure and Services
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Planning Obligations.
Key Policies:	Development Management Policy DM1 – Planning Obligations
Related Policies:	Development Management Policy DM12 – Development in Welsh Speaking Strongholds Development Management Policy DM13 – Design and Resources Topic Based Policy H5 – Affordable Housing Contributions
Target:	To prepare and adopt Supplementary Planning Guidance relating to Planning Obligations within 6 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Planning Obligations not adopted within 6 months of adoption of the LDP

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted October 2018
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Planning Obligations SPG was adopted in October 2018 and therefore within the timescale of six months from the date of LDP adoption.

Action

No further action required.

Objective 10 – Important Assets

To support the operation and development of locally, regionally and nationally important assets located in Powys.

Objective 10 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR42	Developments permitted within the Sennybridge Training Area for operational purposes.		Continue Monitoring
AMR43	Number of developments permitted that would have an impact on strategic resources or assets, or their operation, as identified in Policy SP7.		Continue Monitoring

AMR42: Developments permitted within the Sennybridge Training Area for operational purposes.

Objective:	Important Assets
Indicator:	Developments permitted within the Sennybridge Training Area for operational purposes.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	Topic Based Policy MD1– Development Proposals by the MOD
Target:	For the Sennybridge Training Area to continue as a nationally significant training facility and for its operation to be generally supported by the Plan.
Trigger Point:	1 or more developments proposed for operational reasons refused planning permission in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to identify instances when the LDP fails to support the operational effectiveness of the Sennybridge military training area.

The training area is included within LDP Policy SP7 due to its strategic importance both in the Plan area itself and nationally. The policy states that only development proposals that will not have an unacceptable impact on the asset/resource and the purposes for which it is safeguarded should be permitted. LDP Policy MD1 also safeguards the training area from any development that would compromise its operation and supports proposals that will sustain the operational use of the existing facility.

During this monitoring period one application was permitted (21/1443/FUL) for the construction of a stoned track measuring approximately 200 metres to provide access for forestry maintenance. No comments were received by the Ministry of Defence however, the Officer considered that the development would not negatively impact upon the operation of the training facility.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR43: Number of developments permitted that would have an impact on strategic resources or assets, or their operation, as identified in Policy SP7.

Objective:	Important Assets
Indicator:	Number of developments permitted that would have an impact on strategic resources or assets, or their operation, as identified in Policy SP7.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	
Target:	No developments permitted that would have an unacceptable adverse impact on identified strategic resources and assets identified, or on their operation.
Trigger Point:	1 or more developments permitted that would have an unacceptable adverse impact on identified strategic resources or assets, or on their operation, not in accordance with Policy SP7, and, where applicable, there is an outstanding objection from a statutory consultee (i.e. NRW, CADW) or the relevant Council Officer in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

To identify permissions which may breach the target or trigger point, analysis will focus on cases where a development has been:

- Granted permission by the Planning Committee against an Officer's recommendation for refusal on grounds of LDP Strategic Policy SP7 or
- Granted on Appeal where the Council had originally refused permission on grounds of LDP Strategic Policy SP7.

To identify the planning decisions which could fall into this category, the Minutes of every Planning Committee held over the monitoring period have been studied with a view to investigating cases which were decided against Officer recommendation. Appeal decisions upheld (against the Council's original refusal) have also been investigated. Cases relevant to the monitoring indicator can then be assessed. The results are as follows:

- No decisions have been made by the Planning Committee to approve a planning application against the Officer's recommendation for refusal. This means the trigger point has not been breached.
- No decisions have been granted on Appeal against the Council's refusal of planning permission on grounds of LDP Strategic Policy SP7. The Minutes show that several Appeals have been dismissed including two in cases which relate to the Council citing LDP Policy SP7 to refuse development (18/0826/FUL and 20/2031/OUT) on the grounds of detrimental impact to areas designated for environmental protection.

The results of this monitoring indicator mean it is considered that the Policy is being used effectively and as intended to protect strategic resources and assets.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Theme 4 – Guardianship of Natural, Built and Historic Assets

Objective 11 – Natural Heritage

To conserve and protect Powys’ land, air and water resources important for environmental quality, geodiversity and biodiversity and where possible to ensure development enhances them.

Objective 11 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR44	Preparation and adoption of Supplementary Planning Guidance relating to biodiversity.	SPG Adopted	No Action Required
AMR45	The number of developments permitted on or affecting locally important site designations as identified in Policy DM2 (3).		Continue Monitoring

AMR44: Preparation and adoption of Supplementary Planning Guidance relating to biodiversity.

Objective:	Natural Heritage
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to biodiversity.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	Development Management Policy DM2 – The Natural Environment
Target:	To prepare and adopt Supplementary Planning Guidance relating to biodiversity within 6 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to biodiversity not adopted within 6 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted October 2018
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Biodiversity SPG was adopted in October 2018 and therefore within the timescale of six months from the date of LDP adoption.

Action

No further action required.

AMR45: The number of developments permitted on or affecting locally important site designations as identified in Policy DM2 (3).

Objective:	Natural Heritage
Indicator:	The number of developments permitted on or affecting locally important site designations as identified in Policy DM2 (3).
Key Policies:	Management Policy DM2 – The Natural Environment
Related Policies:	
Target:	No developments permitted on or affecting identified locally important site designations unless in accordance with Policy DM2 (3).
Trigger Point:	1 or more developments permitted on or affecting identified locally important site designations not in accordance with Policy DM2 and where there is an outstanding objection from the County Ecologist or the Local Wildlife Trust.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

LDP Policy DM2 The Natural Environment provides protection for a range of sites, habitats and species that are designated at international, European, national and local level. This monitoring indicator aims to test the policy’s ability to protect the locally important site designations listed under Section 3 of the policy, namely Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Geological Conservation Review Sites (GCRS).

Section 3 of the policy also includes local Biodiversity Action Plan Habitats and Species, but these are not included under this monitoring indicator as they are not classified as a site designation. These however are the subject of SEA Indicator.2 within the Strategic Environmental Assessment (SEA) monitoring framework.

In this monitoring period a total of six individual applications have been permitted, which were close to an LNR, RIGS or GCRS. Analysis of these applications revealed the following;

- One application was located partly within the Llandrindod Lake Park LNR. The protected sites were referred to in the Officer’s report and covered thoroughly by consultation responses received from the County Ecologist and Natural resources Wales. This application was for an extension to an existing car park which the County Ecologist deemed the site area as being unsuitable for supporting protected and priority species. Biodiversity enhancements proposed as part of the application were welcomed and conditioned as part of the approval. Based on the information submitted, it was considered that the proposed development would not result in negative impact to notable features of the Lake Park LNR.

- Three applications were close to a RIGS site and for all three, the Officer's Report clearly identifies the RIGS in question which were identified by both Ecologists and Contaminated Land Officers. Planning conditions have been placed on the permissions for further environmental and contamination investigations to be carried out prior to any works taking place.
- The remaining two applications were close to a GCRS. Of these, the Officer's Reports did cite nearby SSSIs which were identified as planning constraints. Both the SSSIs in question were designated for their geological interest because of their status as a GCRS. Both applications were identified by consultees and concluded that no impact would arise from the applications being permitted.

In summary, an improvement is evident in this monitoring period compared to the three previous years where the site designations have been clearly identified on each application and considered alongside the application. No application has been permitted where there is an outstanding objection from either the County Ecologist, or a Wildlife Trust. That said, close monitoring is still required to ensure this improvement is maintained and not lost.

Note - this indicator is similar to SEA Indicator 34.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 12 – Resources

To facilitate the sustainable management of Powys’ natural and environmental resources whilst enabling development to take place including the provision of at least a 25 year land bank of crushed rock aggregates.

Objective 12 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR46	Extent of primary land – won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN requirement).		Continue Monitoring
AMR47	Number of developments permitted within the defined mineral working buffer zones.		Continue Monitoring

AMR46: Extent of primary land – won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN requirement).

Objective:	Resources
Indicator:	Extent of primary land – won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN requirement).
Key Policies:	Topic Based Policy M1– Existing Minerals Sites
Related Policies:	Topic Based Policy M2– New Minerals Sites
Target:	Percentage of crushed rock aggregates compared against the annual target for the LDP area identified in the Regional Technical Statement.
Trigger Point:	Less than a 25 year land bank of permitted aggregate reserves in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to monitor the performance of LDP policies M1 - Existing Minerals Sites, and M2 - New Minerals Sites, with regards to their ability to maintain a supply of aggregates when compared to the Minerals Technical Advice Note (MTAN) requirement as expressed in the Regional Technical Statement for Aggregates (RTSA) (1st Review 2014 and 2nd Review 2020).

Table 5.7 of the RTSA 2nd Review states that for Powys there is no apportionment of land-won sand and gravel and a total apportionment of 87.98 million tonnes (RTSA 2nd Review) of crushed rock aggregates over a 25-year period. When this is expressed as an annual apportionment it equates to 3.519 million tonnes per annum.

During the monitoring period there were no applications that related to existing mineral sites. There were no applications permitted for the working of new sites for primary won aggregates. No data for annual extraction rates for the monitoring period have been published so a percentage calculation is not possible. However, given the current landbank identified in RTSA 2nd Review the trigger point for this monitoring indicator has not been reached.

Action

Continue Monitoring - Development plan policies are being implemented effectively.

AMR47: Number of developments permitted within the defined mineral working buffer zones.

Objective:	Resources
Indicator:	Number of developments permitted within the defined mineral working buffer zones.
Key Policies:	Development Management Policy DM9 – Existing Mineral Workings
Related Policies:	
Target:	No development is permitted within the defined mineral working buffer zones, unless in accordance with the criteria set out under Policy DM9.
Trigger Point:	1 or more developments permitted within the defined mineral working buffer zones not in accordance with Policy DM9 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to monitor the effectiveness of LDP Policy DM9 – Existing Mineral Workings, and its ability to protect existing mineral working buffer zones from development that constrain the operations of the mineral site.

The policy includes the criteria under which development may be allowed and these are:

- The proposal would not constrain the operations of the mineral site;
- The proposal would not be unacceptably affected by the mineral extraction operations at the site; and
- The proposal can demonstrate the appropriate mitigation measures.

Two planning applications were permitted which were located within mineral working buffer zones. One of the applications related to the after use and restoration of a mineral operation site. The development proposal was for the development of a Global Centre of Rail Excellence at land at and surrounding the Nant Helen Open Cast Coal Site. In this case as the application relates to the after use of the mineral working area LDP Policy DM9 is not considered to be applicable.

The second planning permission permitted, partially intercepted the mineral working buffer zone, and was for the change of use of an existing mobile home to a static glamping pod. In this case it is considered that the proposal would not constrain the operations of the mineral site any more than the existing use, or for the glamping pod to be unacceptably affected by the mineral extraction operations at the site.

It is concluded that all the applications permitted have been granted in accordance with LDP Policy DM9.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 13 – Landscape and the Historic Environment

i. Landscape

To protect, preserve and/or enhance the distinctive landscapes of Powys and adjoining areas, including protected landscapes.

ii. The Historic Environment

To protect, preserve and/or enhance the distinctive historic environment, heritage and cultural assets of Powys, in particular local assets that are not statutorily protected or designated under national legislation, and to ensure that development respects local distinctiveness.

Objective 13 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR48	Preparation and adoption of Supplementary Planning Guidance relating to Archaeology.	SPG Adopted	No Action Required
AMR49	Preparation and adoption of Supplementary Planning Guidance relating to Landscapes.	SPG Adopted	No Action Required
AMR50	Preparation and adoption of Supplementary Planning Guidance relating to Residential Design.	SPG Adopted	No Action Required
AMR51	Preparation and adoption of Supplementary Planning Guidance relating to Historic Environment including the Historic Environment Records.	SPG Adopted	No Action Required
AMR52	Preparation and adoption of Supplementary Planning Guidance relating to Conservation Areas.	SPG Adopted	No Action Required
AMR53	The number of wind energy and major developments permitted and accompanied by a Landscape and Visual Impact Assessment.		Continue Monitoring
AMR54	The number of developments permitted within or affecting the setting of a Conservation Area.		Continue Monitoring

AMR48: Preparation and adoption of Supplementary Planning Guidance relating to Archaeology.

Objective:	Landscape and the Historic Environment
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Archaeology.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance relating to Archaeology within 24 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Archaeology not adopted within 24 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	SPG Adopted July 2021

Analysis

The Archaeology SPG was adopted in July 2021. The approval process had been delayed due to the Covid-19 pandemic as the Council entered Business Critical mode. SPG work re-commenced in 2021 when factual updates were made to the draft SPG and presented to the LDP Working Group in April 2021, before being put forward for adoption by Cabinet.

Action

No further action required.

AMR49: Preparation and adoption of Supplementary Planning Guidance relating to Landscapes.

Objective:	Landscape and the Historic Environment
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Landscapes.
Key Policies:	Development Management Policy DM4 – Landscape
Related Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Target:	To prepare and adopt Supplementary Planning Guidance relating to Landscapes within 12 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Landscapes not adopted within 12 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted April 2019
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Landscape SPG was adopted in April 2019 and therefore within the timescale of 12 months from the date of LDP adoption.

Action

No further action required.

AMR50: Preparation and adoption of Supplementary Planning Guidance relating to Residential Design.

Objective:	Landscape and the Historic Environment
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Residential Design.
Key Policies:	Development Management Policy DM13 – Design and Resources
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance relating to Residential Design within 18 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Residential Design not adopted within 18 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted January 2020
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Residential Design Guide SPG was adopted in January 2020 and therefore within the timescale of 18 months from the date of LDP adoption.

Action

No further action required.

AMR51: Preparation and adoption of Supplementary Planning Guidance relating to Historic Environment including the Historic Environment Records.

Objective:	Landscape and the Historic Environment
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Historic Environment including the Historic Environment Records.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance relating to Historic Environment including the Historic Environment Records within 24 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Historic Environment including the Historic Environment Records not adopted within 24 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	SPG Adopted July 2021

Analysis

The Historic Environment SPG was adopted in July 2021. The approval process had been delayed due to the Covid-19 pandemic as the Council entered Business Critical mode. SPG work re-commenced in 2021 when factual updates were made to the draft SPG and presented to the LDP Working Group in April 2021, before being put forward for adoption by Cabinet.

Action

No further action required.

AMR52: Preparation and adoption of Supplementary Planning Guidance relating to Conservation Areas.

Objective:	Landscape and the Historic Environment
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Conservation Areas.
Key Policies:	Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets
Related Policies:	Development Management Policy DM13 – Design and Resources
Target:	To prepare and adopt Supplementary Planning Guidance relating to Conservation Areas within 18 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Conservation Areas not adopted within 18 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	SPG Adopted January 2020
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

The Conservation Areas SPG was adopted in January 2020 and therefore within the timescale of 18 months from the date of LDP adoption.

Action

No further action required.

AMR53: The number of wind energy and major developments permitted and accompanied by a Landscape and Visual Impact Assessment.

Objective:	Landscape and the Historic Environment
Indicator:	The number of wind energy and major developments permitted and accompanied by a Landscape and Visual Impact Assessment.
Key Policies:	Development Management Policy DM4 – Landscape
Related Policies:	
Target:	No developments permitted that could have a significant landscape or visual impact, unless accompanied by a Landscape and Visual Impact Assessment.
Trigger Point:	1 or more developments permitted that could have a significant landscape or visual impact permitted without an accompanying Landscape and Visual Impact Assessment.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator aims to test the implementation of LDP Policy DM4 – Landscape which seeks to prevent development from having an unacceptable adverse effect, on the valued characteristics and qualities of the Powys landscape. The Policy requires proposals which are likely to have a significant impact on the landscape and/or visual amenity to undertake a Landscape and Visual Impact Assessment (LVIA). This is elaborated upon in paragraph 4.2.33 of the LDP: “Proposals which could have a significant impact on the landscape and/or visual amenity will require a Landscape and Visual Impact Assessment to be undertaken in accordance with relevant guidance. This will include all wind energy proposals (excluding anemometry masts) and most major developments...”

During the monitoring period 12 applications were granted that met the description of either being a “wind energy proposal “or a “major development”, in the Open Countryside.

The submitted information, demonstrating how landscape has been taken into consideration for the 12 applications, is summarised in Table 26 below.

Since the adoption of the Plan a judicial review was sought, challenging the LPA’s decision to grant consent for a major planning application in the Open Countryside, without an LVIA being submitted with the application (listed among several reasons).

The judge stated the following in the letter detailing the outcome of the judicial review:

“Neither policy DM4 nor the guidance (referring to the SPG) referred to made a formal Visual Impact Assessment mandatory. Whether one should be required in the particular case was a matter for the officers and/or committee members, and given their own assessment, made with the assistance of a site visit, that there would be no significant

visual impact, the decision not to require such an assessment cannot be argued to be irrational or unlawful on other grounds”.

The view of the judge supports the approach taken by the LPA, where specific judgements are being made of what constitutes a ‘**significant impact**’ by Planning Officers, based on whether proposed developments are likely to have a significant landscape and visual impact (highly sensitive landscape or due to nature and scale of development) and therefore the need for LVIA varies.

The Landscape SPG was adopted in April 2019. The SPG provides detail on how landscape should be taken into consideration when considering the design and siting of a proposed development. All the developments listed in Table 26 comply with the guidance to some extent.

From the analysis, it is concluded that none of the applications permitted during the period had a significant landscape or visual impact unless they were accompanied by a LVIA.

Table 26. Submitted Documentation Detailing Landscape Consideration for Major Applications in the Open Countryside During Monitoring Period.

Number of applications	Landscape Consideration Document Included with Planning Application Submission
6	Submitted LVIA as part of an EIA
0	Submitted an LVIA
2	Submitted a Landscape Assessment
2	Justified approach to landscape within the Design and Access Statement.
2	Justified approach to landscape within a Planning Statement
0	No Landscape Consideration

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR54: The number of developments permitted within or affecting the setting of a Conservation Area.

Objective:	Landscape and the Historic Environment
Indicator:	The number of developments permitted within or affecting the setting of a Conservation Area.
Key Policies:	Development Management Policy DM13 – Design and Resources
Related Policies:	
Target:	No developments to be permitted in or affecting a Conservation Area, unless in accordance with Policy DM13 or national guidance.
Trigger Point:	1 or more developments permitted in or affecting a Conservation Area not in accordance with Policy DM13 or national guidance and where there is an outstanding objection from the Council’s Built Heritage Officer.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at developments that have been permitted which are either located in or affect the setting of a Conservation Area. The purpose of the indicator is to test the implementation of LDP policies DM13 (3) and SP7 (2 v.) and, in particular, to capture instances where development is permitted where there is an outstanding objection from the Council’s Built Heritage Conservation Officer (BHCO) and where it does not comply with these policies.

Sixty-three developments within or affecting the setting of a Conservation Area have been recorded during this monitoring period, eight of which related to Conservation Area Consent for demolition. In over half of these cases, the BHCO confirmed either support or no objection for the proposals, subject to conditions or following additional information and amendments made to the proposals.

There were also several cases where the BHCO had not commented at the time of writing the Officer’s report, with some involving only change of use and no external alterations, which would, therefore, not impact on the character and appearance of the Conservation Area. Others involved sites outside but adjacent or near to Conservation Areas where the impact of the proposed development on the setting and views into and out of these areas had been considered by Development Management Officers.

A case has been identified where planning permission was granted for change of use of a listed building from an office to a dwellinghouse in the Machynlleth Conservation Area despite an outstanding objection from the Council’s BHCO. The BHCO objected to the application on grounds of insufficient information to fully assess the extent of the works required in connection with the change of use and the impact on the listed building, adjacent listed buildings and the Conservation Area. The planning application had not been accompanied by an application for listed building consent for works associated with the change of use and, therefore, had not been informed by a Heritage Impact

Assessment, and did not provide full details of the works required to meet building regulations. In addition, it was noted that the building had been re-roofed and the chimney demolished without the necessary consent.

The Development Management Officer concluded that, as no internal or external changes were proposed as part of the application, there was not considered to be any harm to the listed building or Conservation Area, and instead included an informative on the planning permission reminding the applicant of the need for listed building consent for further works. It is noted that the approach taken towards determining this application deviates from Cadw best-practice guidance 'Managing Change to Listed Buildings in Wales' (May 2017), which advises that applications for listed building consent, planning permission and building regulations approval should be made concurrently. This advice is reiterated in the Council's Historic Environment Supplementary Planning Guidance (July 2021), which explains that this will enable the overall scheme to be assessed.

A separate listed building application was made and approved for retention of the works undertaken in replacing the roof. The BHCO did not object to this element of the works, however it was made clear that the loss of the chimney was still an outstanding concern, noting that it is specifically mentioned in the listing description. The Article 4 direction in force in the Machynlleth Conservation Area seeks to protect original features, including chimneys, and their importance is reflected in Cadw best-practice guidance 'Managing Change to Listed Buildings in Wales' (May 2017) and 'Managing Conservation Areas in Wales' (May 2017) along with the Council's Supplementary Planning Guidance on Conservation Areas (July 2021). There were no records of any further applications made for any further works involved in converting the listed building or in respect of demolition of the chimney.

Another case involved the removal of an external ATM and signage associated with former use of a listed building as a bank in Welshpool Conservation Area. The BHCO did not object to the principle of removal of these elements, however the replacement of the ATM with a steel plate was not considered acceptable on such a prominent corner building in Welshpool Conservation Area. Amended details had been submitted showing infill with matching brick, and coursing and joints to match the existing brickwork. The BHCO had not formally responded to the re-consultation on these details, however according to the Officer's delegated report, the amendments were in line with those recommended by the BHCO and had been appropriately conditioned under the listed building consent already considered by Cadw. Therefore, the original issues identified with this application had been resolved before planning permission was granted.

The results for this monitoring period show that Officers are determining planning applications against the relevant planning policies, with many decisions being informed by the advice of the Built Heritage Conservation Officer. One case has been identified which suggests regard has not been given to parts of Cadw best practice guidance and the Council's Supplementary Planning Guidance relating to the need for concurrent listed building and planning applications or to the removal of chimneys. Development Management Officers will be reminded of these parts of the guidance to ensure consistency in the approach taken towards these matters.

Action

Continue Monitoring - Development plan policies are being implemented effectively.

Theme 5 – Supporting Healthy Communities

Objective 14 – Healthy Lifestyles

To encourage active healthy lifestyles by enabling access to open spaces, areas for recreation and amenity including allotments or growing spaces, and to ensure development provides opportunities for walking, cycling, open and play spaces where required.

Objective 14 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR55	The amount (ha) and type of public open space provision secured in connection with major residential developments permitted.		Continue Monitoring
AMR56	The area of public open space (ha) that would be lost and gained as a result of development granted planning permission.		Continue Monitoring
AMR57	Preparation and adoption of Supplementary Planning Guidance relating to Open Space		Not Assessed

AMR55: The amount (ha) and type of public open space provision secured in connection with major residential developments permitted.

Objective:	Healthy Lifestyles
Indicator:	The amount (ha) and type of public open space provision secured in connection with major residential developments permitted.
Key Policies:	Development Management Policy DM3 – Public Open Space
Related Policies:	
Target:	That major residential developments contribute towards addressing the open space deficiencies identified in the Open Space Assessment in terms of the amount and type of public open space provided.
Trigger Point:	1 or more major residential developments permitted where no amount of provision is secured for public open space where deficiencies have been identified by the Open Space Assessment in any one year. 1 or more major residential developments permitted where the type of public open space secured is not of the type required by the Open Space Assessment in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the amount (ha) and type of public open space provision secured in connection with all major residential developments permitted. The purpose of the indicator is to test the implementation of LDP Policy DM3, whereby the nature of open space provision secured should be guided by deficiencies in the published Open Space Assessment (2018).

Planning permission was granted for six major residential developments during the period. An open space contribution was secured from two of these planning permissions. The remaining four applications secured onsite provision which varied from areas of informal open space, to play areas and communal gardens with benches.

In all six circumstances the scale and nature of open space of the provision/contribution was considered appropriate, matched the types required by the Open Space Assessment and complied with LDP Policy DM3.

Action

Continue Monitoring - Development plan policies are being implemented effectively.

AMR56: The area of public open space (ha) that would be lost and gained as a result of development granted planning permission.

Objective:	Healthy Lifestyles
Indicator:	The area of public open space (ha) that would be lost and gained as a result of development granted planning permission.
Key Policies:	Development Management Policy DM3 – Public Open Space
Related Policies:	
Target:	Net gain of public open space as a result of development granted planning permission. No net loss of public open space identified or as defined in the Open Space Assessment as a result of development granted planning permission.
Trigger Point:	No net gain of public open space as a result of development granted planning permission in any one year. A net loss of public open space identified or as defined in the Open Space Assessment as a result of development granted planning permission in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator looks at the amount (hectares) of open space lost and gained as a result of planning applications granted during the monitoring period. The purpose of the indicator is to test the implementation of LDP Policy DM3 where areas identified as open space in the Open Space Assessment are protected and where housing developments of ten more contribute towards the provision of open space.

Net gain of public open space

It has not been possible to accurately record the total amount of open space granted due to the fact that the majority of open space provision secured is done via a planning or Section 106 condition. The condition requires the details (location, size maintenance etc...) of the provision to be submitted at a later date. For two of the four schemes, where new open space provision was secured, the planning applications detail a total net gain of 5,808 square metres between them.

In addition to the net gain of public open space secured through housing developments, eight planning applications relating to public open space were approved in the monitoring period. Four of these related to the addition of features to enhance existing provision, the remainder include a new community garden, playing field and two new football pitches. The two new football pitches are in Welshpool and have been secured to compensate for

the loss of the football pitches on Salop Road, these were lost when the land was developed for the new school.

Net loss of public open space

There have been several planning applications permitted on open spaces, mapped in the Open Space Assessment, that can be considered as ancillary / enhancing the existing open spaces. These include facilities such as footbridges, play equipment, viewing platforms and changing rooms. None are considered as a change of use or result in a loss of open space.

Two further applications were permitted that impacted upon open spaces. The first was for an extension to a car park, with 12 of the car parking spaces encroaching on open space as mapped in the open space assessment. In this instance consideration was given in support of the application by the applicant. The supporting information considered the proposal against LDP Policy DM3 and concluded that the proposal would not result in a deficiency for that type of Open Space and that it would enhance the existing provision by providing a facility for users of the public open space itself.

The second application permitted was for two holiday pods at a golf course. The application was considered against LDP Policy TD1 and deemed to complement an existing tourism development. The holiday pods although within the curtilage of the golf course do not result in the loss of any of the course itself.

In conclusion, during the monitoring period there has been a net gain in public open space. LDP Policy DM3 has overall been implemented as intended. However, when reconsidering the policy, in the Replacement LDP, thought should be given to making it clearer that the protection of public open spaces extends beyond what is mapped in the open space assessment.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

AMR57: Preparation and adoption of Supplementary Planning Guidance relating to Open Space.

Objective:	Healthy Lifestyles
Indicator:	Preparation and adoption of Supplementary Planning Guidance relating to Open Space.
Key Policies:	Development Management Policy DM3 – Public Open Space
Related Policies:	
Target:	To prepare and adopt Supplementary Planning Guidance on relating to Open Space within 18 months of adoption of the LDP.
Trigger Point:	Supplementary Planning Guidance relating to Open Space not adopted within 18 months of adoption of the LDP.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

Whilst the Open Space SPG has not progressed beyond drafting stage, the published Open Space Assessment (2018) provides an effective mechanism to test development proposals and their loss or provision of Open Space. The Planning Obligations SPG also includes guidance for Open Space provision, so the non-publication of the Open Space SPG is not considered to be a detriment.

Action

Not Assessed

Objective 15 – Welsh Language and Culture

To support and protect Welsh language and culture in Powys and specifically the Welsh Speaking Strongholds of the north-west and south-west.

Objective 15 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR58	The number of major housing developments permitted within or forming logical extensions to the Towns and Large Villages identified within Policy DM12 (in Welsh Speaking Strongholds) accompanied by a Language Action Plan setting out mitigation measures to protect, promote and enhance the Welsh language and Culture.		Continue Monitoring

AMR58: The number of major housing developments permitted within or forming logical extensions to the Towns and Large Villages identified within Policy DM12 (in Welsh Speaking Strongholds) accompanied by a Language Action Plan setting out mitigation measures to protect, promote and enhance the Welsh language and Culture.

Objective:	Welsh Language and Culture
Indicator:	The number of major housing developments permitted within or forming logical extensions to the Towns and Large Villages identified within Policy DM12 (in Welsh Speaking Strongholds) accompanied by a Language Action Plan setting out mitigation measures to protect, promote and enhance the Welsh language and Culture.
Key Policies:	Development Management Policy DM12 – Development in Welsh Speaking Strongholds
Related Policies:	
Target:	For all major housing developments within or forming logical extensions to the Towns and Large Villages identified to be accompanied by a Language Action Plan which includes mitigation measures to protect, promote and enhance Welsh language and Culture.
Trigger Point:	1 or more major housing developments permitted within or forming logical extensions to the Towns and Large Villages identified, without a Language Action Plan setting out mitigation measures to protect, promote and enhance the Welsh language and Culture in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

This monitoring indicator tests the implementation of LDP Policy DM12, which applies to major windfall development permitted within Welsh Speaking Strongholds.

The monitoring has captured three developments permitted during this monitoring period, all located within Ystradgynlais. However, two of these permissions were for reserved matters approval, one relating to outline planning permission granted prior to LDP adoption, and the other relating to an outline planning permission on an LDP housing allocation reported in AMR 2020.

The third case related to full planning permission for the development of 117 dwellings on an LDP Housing Allocation (P58 HA10), which benefited from a previous outline planning permission for up to 138 dwellings (that case was reported in AMR 2020). The Planning Officer clarified the position on the Welsh language with Planning Policy at the time, who advised that LDP Policy DM12 does not apply to LDP Housing Allocations as the LDP’s Sustainability Appraisal has already assessed their impact on the Welsh language. The wording of the policy is, instead, aimed at windfall (non-allocated) developments. This

approach reflects national guidance set out in Technical Advice Note 20, which only expects Welsh Language Impact Assessments to be carried out in connection with large windfall developments within areas of Welsh language sensitivity or significance. The Officer, however, considered it to be acceptable to re-attach a condition attached to a previous consent on the site requiring Welsh language and culture mitigation plan to be submitted for approval.

The previous monitoring results in respect of this indicator, for AMR 2021, identified inconsistency in the way that LDP Policy DM12 was being applied, and highlighted the need for Officer training. The results for this monitoring period reflect the fact that the policy did not apply, and, in the third case, the Officer decided to apply policy requirements based on site specific circumstances.

Action

Continue Monitoring

Development plan policies are being implemented effectively.

Objective 16 – Community Well-being

To promote development that supports community wellbeing and cohesion, especially in communities suffering from multiple deprivation and social exclusion.

Objective 16 Local Indicators - Summary Table for Annual Monitoring Report Period.

Ref No:	Indicator	Assessment	Action
AMR59	Number of developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service.		Policy Review Required

AMR59: Number of developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service.

Objective:	Community Well-being
Indicator:	Number of developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service.
Key Policies:	Development Management Policy DM11 – Protection of Existing Community Facilities and Services
Related Policies:	
Target:	No developments permitted that result in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service, unless in accordance with Policy DM11.
Trigger Point:	1 or more developments permitted resulting in the loss of an existing community or indoor recreation facility, or neighbourhood/village shop, public house or service not in accordance with Policy DM11 in any one year.

Outcome / actions, year on year:

LDP Adopted:	17/04/2018
AMR 2020 (2019-2020):	
AMR 2021 (2020-2021):	
AMR 2022 (2021-2022):	

Analysis

LDP Policy DM11 seeks to protect community facilities and services unless an alternative use can be justified in accordance with the policy. This monitoring indicator monitors the number of planning permissions given for a change of use involving loss of an existing community facility or service, in order to test the implementation of LDP Policy DM11.

During this monitoring period, 17 developments of this type have been permitted, the majority of which involved change of use/conversion to new uses, with only two developments involving redevelopment (demolition and new build). 13 of these developments proposed residential use (some of which were described as holiday units), with other proposed uses including offices, storage, light industrial use and a food bank. These developments have resulted in the loss (or in some cases partial loss) of a range of community facilities and services, including a former school, library, nursing home, clinic, meeting hall, chapels, public houses, bar, cafe, restaurant, shops, and a night club.

In the majority of cases, these proposals have been assessed specifically under LDP Policy DM11 and have been justified and supported by evidence relating to viability, marketing, and alternative uses/provision, in order to demonstrate compliance with the policy criteria. In the case of the change of use of a former nightclub at Llandrindod Wells, planning permission had previously been granted for its change of use to dwellings, however the latest proposal involved change of use to a foodbank, which would continue with a community use.

The results of the previous monitoring period (AMR 2021) suggested that LDP Policy DM11 was not being applied consistently, particularly in respect of redevelopment schemes. Two cases involved redevelopment during this monitoring period, one of which involved affordable housing on the site of a former school at Bronllys, which was assessed under LDP Policy DM11. The other example involved the demolition of a redundant prefabricated meeting hut, formerly used as village hall, and its replacement with a dwelling, in Forden. It is noted that Forden community centre is now located on the site of the primary school, which meant that the former use of the building was redundant. The temporary nature and dilapidated condition of the building meant that it would have been unsuitable for an alternative community use. This case would not have undermined the objectives of LDP Policy DM11.

In terms of the distribution of the developments permitted across the settlement tier, the majority were located in Towns and Large Villages, with a limited number in Small Villages and the Open Countryside – see Table 27. Therefore, the majority of these developments have come forward in the most sustainable locations, according to the LDP.

Officers continue to rely on LDP Policy R3 in assessing applications involving loss of shops in Towns. These cases involved premises used as a hairdressers and a house clearance company, and in mixed use, for instance an industrial unit partly used for retail and a restaurant with a retail element. However, a case in Presteigne did involve the loss of a former local store a short walk from the Town Centre Area, which appeared to have formerly acted as a neighbourhood shop, selling convenience goods. As the premises was not located in the Town Centre Area or Primary Shopping Frontage, the principle of change of use to residential use was deemed acceptable. However, this meant that the criteria of LDP Policy DM11 around vacancy period, marketing evidence and viability, had not been considered. This suggests that there are issues around the interpretation of the policy wording and specifically around the meaning of a neighbourhood shop.

The cases in Small Villages involved conversion of a former chapel and a former craft shop to dwellings, both had been assessed and justified under LDP policy DM11. The two cases located in the Open Countryside included the loss of a public house, which was assessed and justified under LDP Policy DM11. However, LDP Policy DM11 was not applied to the other case, involving the loss of a nursing home. The issue around whether a nursing home should be considered as a community facility has been considered previously in AMR 2021. The reasoned justification to LDP Policy C1 sets out examples of community facilities supported by the policy, but the list does not include nursing homes. There may be a case for protecting existing care facilities to help address the needs of an ageing population, and therefore this will need to be considered as part of the Replacement LDP process.

The results for this monitoring period indicate that LDP Policy DM11 shows some improvement on last year's monitoring results as there is evidence that the policy is being applied to some redevelopment schemes, rather than only being applied to change of use or conversions, as previously appeared to be the case. However, there are still some issues around consistency in the way that the policy is applied, particularly in relation to neighbourhood shops, and around the relationship between this policy and other LDP policy such as policies R3 and C1. This highlights the need to review and clarify the scope and wording of the policy, and to provide clearer definitions of community facilities and services.

These consistency issues will be highlighted to Development Management Officers, however LDP Policy DM11 will be reviewed as part of the Replacement LDP process.

Table 27. Planning Permission Permitted for Change of Use of Existing Community Facilities or Services by Settlement Tier during Monitoring Period.

LDP settlement hierarchy	No. of planning permissions for change of use of existing community facilities or services
Towns	9
Large Villages	5
Small Villages	2
Open Countryside	2
Total	18

Action

Policy Review Required

Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.

6. Results of SA/SEA Indicators

6.1 Results for Monitoring Period 1st April 2021 to 31st March 2022

6.1.1 Local Development Plans should help deliver sustainable development. To ensure that this is the case, it is a legal requirement that the sustainability of the LDP is tested as the plan is prepared. Part of this process is referred to as the Strategic Environmental Assessment (SEA). The SEA for the Powys LDP is accompanied by a monitoring framework which includes 34 SEA indicators used to test the sustainability performance of the Plan. This section details these SEA indicators along with an analysis of the results for each indicator.

6.1.2 The monitoring process is dependent upon a wide range of statistical information that is sourced from both local authority and external sources. For consistency across the lifetime of the Plan the sources have, where necessary, been identified for each SEA Indicator. However, if these sources change over time, then it will be necessary to substitute them for other data sources that provide as high a degree of equivalence with the previous source as possible.

6.1.3 It is also important to recognise that a number of data sources are published on a time interval greater than one year. This means that from one year of monitoring to the next the data used may stay the same which may impact the possible performance of the SEA Indicator. Subsequent monitoring over longer periods of time should address this issue and where appropriate, identify trends. A note is made for each SEA Indicator, where it is known that this problem may occur.

6.1.4 Updated data has become available during the current monitoring period for certain indicators, for instance for the Biodiversity SEA Topic. Further data will become available as data for the 2021 Census is released later in 2022, during the next monitoring period.

6.2 Summary of Main Issues and Trends Identified

6.2.1 The Review Report summarised the main findings of the SEA monitoring, identifying the main issues and trends that have emerged since the LDP was adopted and covering the following SEA topics: Biodiversity, Population, Soils, Strategic Resources and Assets, Cultural Heritage and Geodiversity. In summary, the results for the current monitoring period show:

- A continuation of population trends towards an ageing population, a decrease in the proportion of working age population, and some in-migration of younger adults.
- Average life expectancy remains relatively stable, however healthy life expectancy is reducing.
- The proportion of Welsh speakers is starting to recover following a downward trend since LDP adoption.
- Improvements in the way that safeguarded mineral resources, geodiversity sites, contaminated land and thick peat are being considered as part of the planning application process.

SEA Topic: Biodiversity

SEA Topic Area – Biodiversity
Objective 1: To protect and enhance all designated sites of nature conservation in the Plan area.
Objective 2: To protect and enhance all species and habitats identified in the Powys Local Biodiversity Action Plan or Section 42 List.
Indicator 1 - Increase/decrease in the number of European designated sites in favourable condition.
Indicator 2 - Changes in the status of the habitats and species identified in the Local Biodiversity Action Plan (LBAP).
Indicator 3 - Number of developments permitted which incorporate enhancements to European/ nationally designated sites, and species and habitats identified in the Powys LBAP or Section 42 List.

SEA Topic Area:	Biodiversity
Subtopic:	Designated Sites of Nature Conservation
Indicator 1:	Increase/decrease in the number of European designated sites in favourable condition.
Task:	Review of NRW information on the condition of designated sites. https://naturalresources.wales/evidence-and-data/research-and-reports/protected-sites-baseline-assessment-2020/?lang=en
Timescale:	Dependent on NRW plans for future monitoring

Analysis

The LDP lists 20 sites (SAC and SPA) from the National Site Network (before January 2021, these were referred to as European sites) that are located either wholly or partially within the county, with a further 27 that are wholly outside the county but within 15 kilometres of the Powys boundary. This latter figure includes three that are in England. Across all of these 47 sites there are 173 conservation ‘features’ (162 in or within 15km of the Powys boundary) that provide the justification for the designation of the site in question. These features are the subject of regular assessment that is carried out in Wales by NRW and over the border by Natural England. The purpose of these assessments is to determine the conservation status of the features concerned, and the status is described as being one of the following;

- Unfavourable; Declining
- Unfavourable; Unclassified
- Unfavourable; Recovering
- Favourable; Unclassified
- Favourable; Recovering
- Favourable; Maintained
- Not Assessed
- Classified

The 2020 Baseline Evaluation project was established by NRW to assess the quality of the protected sites in Wales and it is the first time that an exercise to determine the condition of Wales’ protected site features has been undertaken at this scale since 2003.

The focus of the project was mainly on monitoring features currently considered to be qualifying on Wales’ protected sites. Types of terrestrial and freshwater features in scope for monitoring: flora, fauna, geology, geomorphology and a mixture of these natural features.

Of the 162 conservation features in or within 15km of the Powys boundary, only 32 (20%) were given the indicative condition as ‘Favourable’ a further 86 (53%) were considered ‘Unfavourable’ and the remaining 44 (27%) ‘Unknown’. The condition classed as ‘unknown’ was given where there was insufficient evidence to determine.

The findings from this project (see Table 28) will provide a vital baseline to build an approach to management and monitoring across the wider suite of protected sites (SACs, SPAs and SSSIs).

* NB; please note that the Section 42 list referred to under Objective 2 heading above, has now been replaced by the Environment (Wales) Act 2016 Section 7 list

Table 28. Indicative Condition of Conservation Features in or within 15km of the Powys Boundary.

Indicative Condition	2020
Favourable	20%
Unfavourable	53%
Unknown	27%

SEA Topic Area:	Biodiversity
Subtopic:	Important Habitats and Species
Indicator 2:	<p>Changes in the status of the habitats and species identified in the Local Biodiversity Action Plan (LBAP). NOTE: the LBAP has been replaced by the Powys Nature Recovery Plan - https://en.powys.gov.uk/article/12296/Powys-Nature-Recovery-Action-Plan & https://en.powys.gov.uk/article/12298/Appendix-A & https://en.powys.gov.uk/article/12300/Appendix-B</p>
Task:	Review of PNRAP information and any associated future monitoring.
Timescale:	Dependent on future arrangements

Analysis

The Powys Nature Recovery Action Plan (PNRAP) which builds on the previous Powys LBAP, was adopted in March 2022. There is currently no standardised mechanism for reporting on Nature Recovery Action Plan progress. Previously, the Biodiversity Action Reporting System (BARS) was used to report on actions contributing towards the delivery of the Local Biodiversity Action Plans, but this is no longer available. To monitor its progress, a list of projects and activities taking place in Powys which contribute to the delivery of the PNRAP will be compiled and updated annually by the Powys Nature Partnership until standardised reporting mechanisms have been agreed. Planning policy will be looking to align its monitoring with this going forward.

* NB; please note that the Section 42 list referred to under Objective 2 heading above, has now been replaced by the Environment (Wales) Act 2016 Section 7 list.

SEA Topic Area:	Biodiversity
Subtopic:	Enhancements
Indicator 3:	Number of developments permitted which incorporate enhancements to European/ nationally designated sites, and species and habitats identified in the Powys LBAP or section 42 List.
Task:	Review of PCC Development Management information.
Timescale:	Annually

Analysis

In October 2019, the Welsh Government issued a letter to LPAs explaining the position in terms of securing biodiversity enhancements as part of planning applications. Biodiversity enhancements are expected to be secured in connection with all developments, including those developments affecting National Site Network, species and habitats.

In summary, this Indicator no longer requires monitoring due to change in national approach towards enhancement.

SEA Topic: Population and Human Health

SEA Topic Area – Population and Human Health
<p>Objective 3: Enhance the provision of housing, employment, and community services to meet the needs of the population and in response to demographic changes (e.g., the ageing population and the need to retain the young working age population).</p> <p>Objective 4: Promote improvement in community safety.</p> <p>Objective 5: Promote improvement in human health and opportunities for healthy living.</p> <p>Objective 6: To prevent or minimise exposure to potential sources of nuisance and risk to human health.</p>
Indicator 4 - Change in average life expectancy.
Indicator 5 - Ratio of working age population to children and retired population.
Indicator 6 - Percentage of population aged 75 and over.
Indicator 7 - Migration trends of younger adults (aged 20-34).
Indicator 8 - The number of police recorded road accidents involving personal injury.
Indicator 9 - Number of police recorded crimes.
Indicator 10 - Percentage of people participating in sporting activities three or more times a week.
Indicator 11 - Number of planning applications referred to the Health and Safety Executive.

SEA Topic Area:	Population and Human Health
Subtopic:	Population (demographic profile).
Indicator 4:	Change in average life expectancy.
Task:	Office of National Statistics (ONS) https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies
Timescale:	Census (2021) data available 2022. Average life expectancy every 2-4 years (in line with Welsh Government timescales).

Analysis

The most recently available Welsh Government statistics for Powys (including the Brecon Beacons National Park) average life expectancy at birth relate to averages for the years 2018 to 2020.

Figures shown in Table 29 has identified an increase in male life expectancy at birth and a decrease in female life expectancy at birth from 2016 to 2020.

However, perhaps more notable are the figures for a healthy life expectancy at birth with males at 62.02 years in 2018 to 2020 compared to 65.54 years in 2016 to 2018 and females at 65.62 years in 2018 to 2020 compared to 68.2 years in 2016 to 2018.

Census (2021) data is due to be released from June 2022 onwards.

Table 29. Health and Life Expectancy at Birth.

Health and Life Expectancy	2016 -2018	2017-2019	2018-2020
Life expectancy at birth – Male	79.80 years	79.97 years	80.13 years
Life expectancy at birth - Female	84.04 years	83.69 years	83.38 years
Healthy Life expectancy at birth - Male	65.54 years	63.3 years	62.02 years
Healthy Life expectancy at birth - Female	68.2 years	66.31 years	65.62 years

SEA Topic Area:	Population and Human Health
Subtopic:	Population (demographic profile).
Indicator 5:	Ratio of working age population to children and retired population.
Indicator 6:	Percentage of population aged 75 and over.
Indicator 7:	Migration trends of younger adults (aged 20-34).
Task:	Review Census information Office of National Statistics (ONS) midyear population estimates
Timescale:	Census (2021) data available 2022. ONS data available annually.

Analysis

The most recent data available for these three SEA indicators is the 2020 Mid-Year Estimates published in June 2021 and superseded by a newer version released in January 2022. The data for Powys remains unchanged.

Indicator 5; Based on the 2020 Mid-Year Estimates the population of Powys is estimated to be 133,030, which represents an increase in population size of 595 since 2019. Approximately 75,160 of the total population are considered to be of working age (between 16 and 64 years) which equates to 56.49%. This represents an increase from the 2019 figure by 264. There are 21,069 children (0 to 15 years) (15.83%). This represents a reduction of 94 from 2019. 36,801 people are aged 65 or over (27.66%). This represents an increase of 425 from 2019. Taken together the populations of children and retired people amount to 57,870 people or 43.49% of the total population, compared to the 56.49% who are of working age. This represents an increase on 2019 of 331 people who are either children or retired and thus are not considered to be working. Changes in these figures since LDP adoption are summarised in Table 30. This demonstrates a continuation of trend relevant to SEA objective 3 to enhance provision of housing, employment and community services to meet the needs of the population and in response to demographic changes, such as the ageing population.

Indicator 6; Based on the 2020 Mid-Year estimates, approximately 17,077 people live in Powys who are 75 years or older, this equates to 12.83% of the total population. This represents an increase of 316 (0.18%) from 2019. Changes in these figures since LDP adoption are summarised in Table 31. This demonstrates a continuation of trend relevant to SEA Objective 3 to enhance provision of housing, employment and community services to meet the needs of the population and in response to demographic changes, such as the ageing population.

Indicator 7; Based on the 2020 Mid-Year Estimates, there has been a net inflow of +58 younger adults (20-34) age group into Powys, which compares to the same figure in the previous year (2019). Overall, there has been a net inflow of +162 people within the younger adults (aged 20-34) age group over the three years since LDP adoption. Annual changes are summarised in Table 32. This identifies a potential reversal of trend relevant to SEA Objective 3 particularly in terms of the need to retain the young working age population. Census (2021) data is due to be released from June 2022 onwards which will enable further analysis of this indicator.

Table 30. Percentage of Working Age Population to Children and Retired Population in Powys (2018, 2019 and 2020 Mid-Year Estimates).

Age groups	2018	2019	2020	+/- percentage change from 2018
Working Age (between 16 and 64 years)	56.98%	56.55%	56.49%	-0.49%
Children (0 to 15 years) and People aged 65 years or over	43.01%	43.44%	43.49%	+0.48%

Table 31. Percentage of Population Aged 75 and Over (2018, 2019 and 2020 Mid-Year Estimates).

Age group	2018	2019	2020	+/- percentage change from 2018
Population aged 75 years and over	12.20%	12.65%	12.83%	+0.63%

Table 32. Net Inflow of Younger Adults (aged between 20 and 34) into Powys (2018, 2019 and 2020 Mid-Year Estimates).

	2018	2019	2020	+/- change from 2018
Total net inflow	+46	+58	+58	+162

SEA Topic Area:	Population and Human Health
Subtopic:	Community safety
Indicator 8:	The number of police recorded road accidents involving personal injury.
Task:	Review of Welsh Government traffic statistics: https://gov.wales/police-recorded-road-accidents-interactive-dashboard https://statswales.gov.wales/Catalogue/Transport/Roads/Road-Accidents
Timescale:	Annually

Analysis

The data available for this monitoring period covers the timeframe from 1st January 2021 to 30th September 2021. Table 33 incorporates these figures. For the first three quarters of 2021 there were 223 road accidents with 288 casualties. As shown in Table 34, 210 of these casualties were slightly injured, 75 seriously injured and three fatalities. Two of these fatalities occurred in the 2nd quarter with the third in quarter three.

We are yet to see the data for the final quarter of 2021 however, the trend would suggest it is likely to be higher than the figures presented for 2020.

Longer term monitoring is needed to identify any trends post-covid and impacts in relation to SEA objective 5 to promote improvement in community safety.

Table 33. Total Number of Police Recorded Road Accidents Involving Personal Injury in Powys.

	2019	2020	2021*
No. of road accidents	351	216	223

*(1st January to 30th September 2021)

Table 34. Number of Casualties in Road Accidents by Severity in Powys .

	2019	2020	2021*
Slightly injured	230	207	210
Seriously injured	107	81	75
Fatalities	14	4	3

*(1st January to 30th September 2021)

SEA Topic Area:	Population and Human Health
Subtopic:	Community safety
Indicator 9:	Number of police recorded crimes
Task:	Review of Powys crime statistics, taken from the Powys Community Safety Partnership: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatabycommunitysafetypartnershiparea
Timescale:	Annually

Analysis

The figures used for this analysis relate to the calendar year of 2021 and show the total recorded crime (excluding fraud) in the county of Powys was 9,221. This represents a significant increase of 2,315 incidents (33.5%) when compared to 2020 (see Table 35).

Since restrictions were lifted in early 2021, police recorded crime data show indications that incident levels are returning to or exceeding the levels seen before the pandemic. The highest increase of recorded crime (excluding fraud) in Powys was ‘violence against the person’ where this has seen a 47.5% increase (3,009 recorded incidents in 2020 and 4,439 in 2021). Within this category ‘stalking and harassment’ saw the largest increase of 86.3% (1,142 recorded incidents for 2020 and 2,128 in 2021).

Longer term monitoring is needed to identify any trends post-covid and impacts in relation to SEA Indicator 5 to promote improvement in community safety.

Table 35. Numbers of Police Recorded Crimes in Powys.

	2014	2015	2016	2017	2018	2019	2020*	2021*
Number of recorded crimes:	4,263	4,799	5,396	5,979	6,060	6,959	6,906	9,221

*These figures are for headline offences and exclude fraud.

SEA Topic Area:	Population and Human Health
Subtopic:	Human Health
Indicator 10:	Percentage of people participating in sporting activities three or more times a week.
Task:	Review of National Survey for Wales and School Sport Survey statistics: https://gov.wales/national-survey-wales-results-viewer
Timescale:	National Survey for Wales Annually.

Analysis

Updated figures have not been available since the monitoring report AMR 2020 where it was reported that of the respondents located in Powys, 29% answered that they did participate in a sporting activity three or more times a week.

In response to the Covid-19 pandemic, 2020-2021 was not a typical survey year, with monthly and then quarterly questionnaires being asked by telephone. An experimental module of sports questions were asked in the final quarter of the year, but the results were not reliable enough to be published.

The sports module has been updated for the 2021-2022 survey and full results will be published mid-July 2022 and will be captured in future monitoring.

SEA Topic Area:	Population and Human Health
Subtopic:	Human Health
Indicator 11:	Number of planning applications referred to the Health and Safety Executive.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

During this monitoring period a total of four planning applications were referred to the Health and Safety Executive (HSE).

All four applications were within consultation distance of the High Pressure Gas Transmission Pipeline in the areas of Garthbrenegy, Llanigon, Llyswen and Glasbury. The HSE responses concluded that they had no grounds on which to oppose the proposals.

No applications were referred to the HSE for Hazardous Substances.

This is a positive impact in relation to SEA objective 6 to prevent or minimise risk to human health.

SEA Topic: Soil

SEA Topic Area – Soil
Objective 7: To protect soils that are classified as being important for carbon storage and agriculture.
Objective 8: To prevent contamination of land and support remediation as part of new development.
Indicator 12 - Amount (ha) of development permitted on thick peat areas (mapped by the British Geological Survey).
Indicator 13 - Amount (ha) of development permitted on greenfield land outside development boundaries.
Indicator 14 - Number of developments where a Verification Report has been approved by the Local Planning Authority demonstrating the remediation of contaminated land.

SEA Topic Area:	Soil
Subtopic:	Carbon storage
Indicator 12:	Amount (ha) of development permitted on thick peat areas (mapped by the British Geological Survey).
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

This SEA Indicator monitors the performance of section 13 of LDP Policy DM13, with regards to that policy’s ability to protect the important carbon sinks (bullet point v.), such as thick peat, that exist within the Powys LPA area.

An analysis of the Development Management data showed that there were six applications that were permitted that were close to or over an area of thick peat.

The first was a Section 73 application at Carno Windfarm (20/1610/REM) with proposed changes to increase the tip heights for all 13 turbines.

The second application (21/0559/OUT) situated in the former Nant Helen opencast colliery. This application relates to a number of potential after uses for the former opencast site, with this application in particular being the proposed Global Centre for Railway Excellence. Whilst this application does, ostensibly, cover an area of thick peat, the area of peat in question was actually removed many years ago during opencast working prior to the adoption of the LDP. Its recorded presence reflected the age of the mapping dataset.

A third application (21/0619/FUL) at Cemmaes Windfarm (operational) for installation of external transformers and cabling, identified that all works would be carried out on existing hardstanding’s that were approved under the original consent. The majority of the application was located outside of the thick peat with approximately 0.129ha within the thick peat area.

The fourth application was in the Elan Valley for the installation of a power generator and cabinet within an existing telecommunications base station and the fifth application was for the construction of two steel portal frames to form solar canopies for EV charging on an existing car park at Derwenlas, which, combined affected approximately 0.013ha of thick peat.

Finally, the sixth application in Adfa affected approximately 0.002ha of thick peat, however this was a Reserved Matters application addressing conditions imposed on an application that was determined prior to the adoption of the LDP.

The area of thick peat at Nant Helen had been removed prior to adoption of the LDP, and the two applications at Carno and Adfa relate to Section 73 and reserved matters approval respectively, and therefore the presence of thick peat would not have been relevant to these applications. This leaves the remaining applications which, combined, involved 0.142 ha of thick peat deposits. However, these applications did not identify any concerns regarding loss of thick peat given that they were located on existing developments.

SEA Topic Area:	Soil
Subtopic:	Agricultural Land
Indicator 13:	Amount (ha) of development permitted on greenfield land outside development boundaries.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

This SEA Indicator is similar to monitoring indicator AMR20 in the Annual Monitoring Report, from which the following details are sourced.

During this monitoring period, permission was granted on windfall sites for an area totalling 453.99 hectares (ha). However, within the period, planning permission (21/0559/OUT) was granted for the development of a Global Centre of Rail Excellence at the former Nant Helen Open Cast Coal Site. This application equates to 354.27 ha of the 453.99 ha, so has been removed to prevent the data being distorted, this gives a remaining total of 99.72 ha of permitted development on windfall sites.

(See Table 36) From the 99.72 ha, 22.98 ha (23%) of it was on previously developed land, with 75.55 ha (76%) on greenfield sites and 1.28 ha (1%) on a mixture of previously developed land and greenfield. However, on closer inspection it can be seen that some of the applications on greenfield sites will continue to be classified as greenfield when the development proposal is completed. This includes all permissions for agricultural developments (21.91 ha), open space proposals (3.46 ha) and renewable energy schemes (2.06 ha) - where the majority of the original land use remains the same (biomass boilers installed in existing agricultural buildings and solar photovoltaic panels installed on agricultural land).

To analyse this SEA Indicator against the LDP policies in detail, all applications for renewable energy - where the majority of the original landuse remains the same, together with agricultural and open space development proposals shall be **excluded** from the data.

The revised results show that during the monitoring period, planning permission was granted on windfall sites for an area totalling 72.27 ha. From the 72.27ha, 22.27 ha (32%) of it was on previously developed land, with 48.22 ha (67%) on greenfield sites and 1.28 ha (2%) on sites containing a mixture of greenfield and previously developed land.

When interpreting these results, it should be noted that the Plan area is one of the most rural areas in Wales. The total Plan area equates to approximately 430,301 ha, of which only 3,054 ha lies within the development boundaries (less than 1% of the total area). The results from this indicator reflects the characteristics of the area and the wider needs of the economy and population.

Longer term monitoring is required to establish whether the trend towards more of a balance between the development and use of greenfield land and previously developed land continues.

Table 36. Percentage of Greenfield Land outside Development Boundaries where Development Permitted.

	2019	2020	2021	2022
% of greenfield land outside of development boundaries	70%	67%	50%	67%

SEA Topic Area:	Soil
Subtopic:	Contaminated Land
Indicator 14:	Number of developments where a Verification Report has been approved by the Local Planning Authority demonstrating the remediation of contaminated land.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

The aim of this SEA Indicator is to assess the effectiveness of LDP Policy DM10 Contaminated and Unstable Land.

During the current monitoring period a total of 10 developments had planning conditions relating to Verification Reports discharged with the Verification Report being approved by the LPA. This represents a decrease of seven from 2020-2021.

Within the monitoring period a total of 15 discharge of condition applications were submitted relating to a verification report. Five were refused due to the verification report not being completed or submitted as part of the application. Decisions at the discharge of condition stage are being informed by advice from the Contaminated Land Officer and the need to demonstrate remediation through a verification report is being fully considered in the planning process.

SEA Topic: Water

SEA Topic Area – Water
Objective 9: To maintain and improve water quality and quantity.
Indicator 15 - By River Basin Management Plan Area for Western Wales River Basin Management Plan and Severn River Basin Management Plan: <ul style="list-style-type: none">• % of surface waters are at 'good' status.• % of groundwater bodies at 'good' status.
Indicator 16 - Number of planning permissions that incorporate SUDs.

SEA Topic Area:	Water
Subtopic:	Water quality and quantity
Indicator 15:	<p>By River Basin Management Plan Area for Western Wales River Basin Management Plan and Severn River Basin Management Plan:</p> <ul style="list-style-type: none"> • % of surface waters are at ‘good’ status. • % of groundwater bodies at ‘good’ status.
Task:	<p>Review information from NRW/EA:</p> <p>https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/river-basin-management-plans/?lang=en & https://waterwatchwales.naturalresourceswales.gov.uk/en/</p> <p>https://www.gov.uk/government/collections/river-basin-management-plans-2015#severn-river-basin-district-rbmp:-2015</p>
Timescale:	River Basin Management Plans run in 6-year cycles. NRW and EA updates classification every 3 years but run on different timetables.

Analysis

The aim of this SEA Indicator is to test the effectiveness of LDP Policy DM2 -The Natural Environment and in particular, its performance regarding Section 4 concerning the achievement of the Water Framework Directive’s (WFD) overarching objectives.

The WFD Regulations 2017 sets objectives for each quality element in all water bodies, including an objective for the water body as a whole. The default objective is to aim to achieve good status or potential by 2027. There are five categories: Bad, Poor, Moderate, Good, and High. Assessing the quality of waters in Powys is the responsibility of Natural Resources Wales (NRW) and this monitoring occurs in six-year time periods known as cycles.

The quality of surface waters is assessed across two separate criteria: ecological and chemical. For a surface waterbody to be in overall good status both ecological and chemical status must be at least good.

The quality of ground waters is also measured using two separate criteria: chemical and quantitative. As with surface waters, for a groundwater to be classified as 'good' it must achieve 'good' status in both of these criteria.

In the AMR 2020 monitoring period (2019-2020) (see Table 37), for surface waters, there were a total of 239 waterbodies within the LDP area, of these 108 were classified as reaching 'good' status, 103 achieving 'moderate' status, 25 considered 'poor' and three 'bad'. When expressed as a percentage, this meant that 45.2% of the surface water bodies achieved the status of 'good'.

For groundwaters, there were considered to be a total of 17 waterbodies, within the LDP area, of these seven were classified as 'good', whereas the remaining 10 only achieved a 'poor' status. When expressed as a percentage, this meant that 41.17% of groundwaters in the LDP area achieved the status of 'good'.

'Cycle 3' of Groundwater classification data for 2021 is due to be available in mid-July 2022. The next interim update is due in 2024 for surface waters.

The Western Wales River Basin Management Plan (RBMP) 2021-2027 has been submitted to the Minister for Climate Change (in Wales) with the final plans due to be published in mid-July 2022. Consultation is currently out on the Welsh part of the Severn River Basin Management Plan 2021-2027.

Table 37. Percentage of Water Bodies at ‘Good’ Status within Powys LDP Area.

Waterbodies classification	2019
Surface waters – ‘good’ status	45.2%
Surface waters – ‘moderate’ status	43.1%
Surface waters – ‘poor’ status	10.5%
Surface waters – ‘bad’ status	1.2%
Ground waters – ‘good’ status	41.2%
Ground waters – ‘poor’ status	58.8%

SEA Topic Area:	Water
Subtopic:	Water quality
Indicator 16:	Number of planning permissions that incorporate SuDS.
Task:	Review of PCC Development Management data.
Timescale:	Annually.

Analysis

From 7th January 2019, schedule 3 to the Flood and Water Management Act (2010) made the provision of Sustainable Drainage Systems (SuDS) a mandatory requirement for all new developments of more than one dwelling or bigger than 100m² in size. As a result, this SEA Indicator is no longer relevant.

SEA Topic: Air

SEA Topic Area – Air
Objective 10: To protect and improve air quality in Powys.
Indicator 17 - Levels of average NO ₂ , PM _{2.5} and PM ₁₀ concentrations (recorded as Air Quality Exposure Indicators) across Powys.
Indicator 18 - Specific levels of NO ₂ against National Air Quality Strategy Objectives across Powys.

SEA Topic Area:	Air
Subtopic:	Air quality
Indicator 17:	Levels of average NO₂, PM_{2.5} and PM₁₀ concentrations (recorded as Air Quality Exposure Indicators) across Powys.
Task:	Review of Welsh Government Air Quality Indicators: https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Air-Quality/airqualityindicators-by-localauthority
Timescale:	Annually.

Analysis

Air Quality Exposure Indicators (average NO₂, PM_{2.5} and PM₁₀ concentrations) are derived from modelled data for each square kilometre in Wales and measured in µg/m³. Powys County Council does not monitor for PM₁₀ or PM_{2.5}. Each year the UK Government’s Pollution Climate Mapping (PCM) model calculates average pollutant concentrations for each square kilometre of the UK. The model is calibrated against measurements taken from the UK’s national air quality monitoring network.

NO₂ is the chemical formula for Nitrogen dioxide, which is one of the commonest air pollutants. PM₁₀ and PM_{2.5} stands for airborne Particulate Matter of 10 and 2.5 micrometres (microns) or less respectively.

Latest figures for this monitoring period based on 2020 data show a drop across each concentration (as shown in Table 38). This reveals a positive impact in relation to SEA Objective 10 to protect and improve air quality in Powys. Longer term monitoring is required to analyse whether this trend continues.

Table 38. Levels of Average NO₂, PM2.5 and PM10 Concentrations (In µg/m³) (Recorded as Air Quality Exposure Indicators) across Powys.

Year	NO₂	PM2.5	PM10
2020	3	5	9
2019	4	7	10
2018	4	6	10
2017	4	6	9
2016	5	6	10
2015	4	7	10
2014	5	8	11
2013	6	8	12

SEA Topic Area:	Air
Subtopic:	Air quality
Indicator 18:	Specific levels of NO₂ against National Air Quality Strategy Objectives across Powys.
Task:	Review of information held by PCC Environmental Health.
Timescale:	Annually.

Analysis

Powys County Council’s Air Quality Progress Report, published in September 2021 and using data gathered in 2020, explains that there were no automatic monitoring sites operating in the county, but undertook non-automatic (passive) monitoring of NO₂ at seven sites during 2020. Two of these were within the Brecon Beacons National Park.

The results of the monitoring for 2020 (are incorporated into Table 39).

The annual mean concentration data recorded for NO₂, during 2020, at each of the monitoring sites, did not exceed the annual mean NO₂ AQS objective level of 40µg/m³.

Significant reductions in the annual mean concentrations of NO₂, compared to previous years, were recorded at New Road, Newtown i.e., the site of the revoked Air Quality Management Area (AQMA). This reduction, in mean annual NO₂ concentrations, is a likely consequence of the opening of the Newtown Bypass in February 2019.

The results show a positive impact in relation to SEA Objective 10 to protect and improve air quality in Powys. Longer term monitoring will establish if the trend will continue.

Table 39. Annual Mean Concentrations of NO₂ (in µg/m³) at Monitoring Sites in Powys, by Year from 2013.

Site ID	2013	2014	2015	2016	2017	2018	2019	2020
POW (M) 1	31.9	28.8	29	31	38	38	26	21.6
POW (M) 2	32.9	33.9	29	32	37	29	22	18.8
POW (M) 3,4, & 5	39.5	38.1	38	39	36	37	24	19.7
POW (M) 6	36.6	33	30	32	33	30	22	18.2
POW (M) 7	10.4	9.4	9	11	9	9	8	6.8
WG 6-7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.1
WG 8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.1

SEA Topic: Climatic Factors

SEA Topic Area – Climatic Factors
Objective 11: To reduce flood risk.
Objective 12: To reduce greenhouse gas emissions.
Indicator 19 - Number of properties (homes and businesses) at medium or high risk of flooding from rivers and the sea.
Indicator 20 - Emissions of greenhouse gases.

SEA Topic Area:	Climatic Factors
Subtopic:	Floodrisk
Indicator 19:	Number of properties (homes and businesses) at medium or high risk of flooding from rivers and the sea.
Task:	Review of Natural Resources Wales flood risk maps.
Timescale:	Annually.

Analysis

This SEA Indicator monitors the performance of LDP Policy DM5 - Development and Flood Risk. This policy requires development proposals to be located away from tidal and fluvial flood plains unless they can demonstrate that the site is justified in line with national guidance and is accompanied by appropriate technical assessments. The data used for monitoring this SEA Indicator is sourced from the Lle website using the dataset for Floodzone 3 (Medium and High Risk). This has been analysed with the Powys County Council dataset for Unique Property Reference Numbers (UPRN) in the county which includes both homes and businesses.

Once addresses located within the National Park have been removed, an analysis of the two datasets revealed that there is a total of 4466 properties now lying within the Floodzone 3 categorisation. This compares to 4,294 from AMR 2021 (2020-2021) and the baseline of 4,264 properties identified in the Monitoring Review (17th April 2018 – 31st March 2019). This represents an increase of 172 addresses on last year's total and 202 from the baseline. The increase is not necessarily due to new planning permissions but more to do with changes to the Floodmap layer and the addition of addresses created on tourism units with 100 addresses being added on an established holiday caravan park at Foel.

This change does not imply a failure of LDP Policy DM5, as Floodzone 3 includes the C1 Floodzone which is those areas protected by flood defences. There is also an inevitable lag between a permission being granted and a completed address appearing on a map, so it continues to be the case that some applications involved in this increase may have been determined before the LDP was adopted or the publication of national guidance in relation to flood risk.

LDP Policy DM5 states, development must be located away from tidal or fluvial floodplains, unless it can be demonstrated that the site is justified in line with national guidance. It is recognised that development is not completely precluded from the areas categorised under

Floodzone 3, certain forms of development may be permitted in accordance with national guidance this includes less vulnerable developments in areas protected by flood defences or on previously developed land.

SEA Topic Area:	Climatic Factors
Subtopic:	Greenhouse Gas Emissions
Indicator 20:	Emissions of greenhouse gases.
Task:	Review of greenhouse gas emissions data in the National Atmospheric Emissions Inventory. https://naei.beis.gov.uk/index
Timescale:	Defra data available annually.

Analysis

Greenhouse gases include a wide range of gases of which Carbon dioxide (CO₂) is probably the most widely known. Emissions of greenhouse gas is not monitored locally but at a national level a number of data sources, including local energy consumption, are used to create nationally consistent annual CO₂ emissions estimates at a local authority level. These estimates are also broken down further into a subset of estimates of emissions that are within the scope of influence of local authorities, However, whilst on the face of it this narrower subset would be more pertinent to use in this context, further analysis reveals that this particular subset excludes emissions that arise from 'land-use' related changes and activity such as forestry, crop and grasslands, wetlands and settlements. As the LDP is directly concerned with land-use therefore it is more appropriate to use the higher Local Authority-level dataset, even though it includes elements that are outside the control of the Local Authority, rather than the narrower subset that is concerned with the scope of the LA's.

This full, national dataset therefore estimates of Carbon dioxide emissions, expressed as kilotonnes (kt) CO₂, in Powys for the year 2019 (the most recent year monitored). These estimates are shown in Table 40 below.

Whilst a wide range of other greenhouse gases (such as methane) are monitored annually at a national level, these datasets are not broken down to local authority level so it is not possible to assess what impact Powys or the LDP will have upon them. As far as the impact of the LDP on CO₂ emissions is concerned, there would appear to be an overall decrease of 15.5kt in emissions of CO₂ arising from the county in this first year of the LDP's application. However, it needs to be borne in mind that;

- a.) the LDP monitoring period may not necessarily mirror exactly this CO₂ data collection period, and;
- b.) this reduction is a continuation of the trend that has been identified every year, with a couple of exceptions, since at least 2005.
- New data is due to be published by the end of June 2022 with the data from this year to include Nitrous oxide (N₂O) and Methane (CH₄)

Table 40. Carbon Dioxide Emissions, Expressed as kt CO₂, in Powys for the Year 2019.

Sector	2018**	2019	Change +/- from previous year	Percentage Change from previous year
Industrial and Commercial	288.9	290.6	+1.7	+0.58%
Domestic	267.4	261.2	-6.2	-2.31%
Transport	344.9	344.5	-0.4	-0.11%
LULUCF*	-104.8	-109.4	-4.6	-4.38%
Total	796.4	786.9	-9.5	-1.19%

*; LULUCF; Land Use, Land Use Changes and Forestry

**; The figures for each year are subject to revision by DEFRA since their original publication dates, hence they may differ from those cited in the previous AMR.

SEA Topic: Strategic Resources and Assets

SEA Topic Area – Strategic Resources and Assets
Objective 13: To protect mineral resources from development that would preclude extraction.
Objective 14: To protect important material assets including strategic, transport and location specific infrastructure from incompatible development.
Indicator 21 - Number of existing mineral sites.
Indicator 22 - Number of developments permitted for permanent development on safeguarded mineral resource sites.
Indicator 23 - Number of planning applications for development that would affect strategic transport infrastructure referred onto the Welsh Government.
Indicator 24 - Number of developments permitted on or affecting the Sennybridge (Ministry of Defence) Training Area.

SEA Topic Area:	Strategic Resources and Assets
Subtopic:	Minerals
Indicator 21:	Number of existing mineral sites.
Task:	Review of information relating to existing mineral sites as set out in table M1 of the LDP.
Timescale:	Annually.

Analysis

Table M1 in the LDP lists the 15 existing minerals operations sites in Powys at the time of the LDP’s adoption. Since then, no new mineral sites have been approved and none of the existing sites have closed. Consequently, the number of mineral sites in the Powys LPA area remains at 15.

SEA Topic Area:	Strategic Resources and Assets
Subtopic:	Minerals
Indicator 22:	Number of developments permitted for permanent development on safeguarded mineral resource sites.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

The aim of this SEA Indicator is to test the effectiveness of LDP Policy DM8 - Minerals Safeguarding. The policy states that Minerals Safeguarding Areas have been designated for deposits of sand and gravel, sandstone, limestone, igneous rocks and surface coal, and these areas are shown on the LDP Proposals Map in accordance with national policy requirements. Defining such areas does not imply any presumption that they will be worked but merely aims to ensure they remain available as and when future generations may need to access them.

During this monitoring period, 161 applications were permitted within or partially overlapping a Mineral Safeguarding Area. Of the 161 applications, 52 did not discuss compliance with LDP Policy DM8 in the Officer’s report.

Of the 52 proposals, 49 were for proposals considered not to have any impact, examples include the conversion or redevelopment of existing buildings, minor extensions to existing buildings or proposals for the siting of camping pods and static caravans. For the remaining three applications, in all instances the identification of the Mineral Safeguarding Area as a constraint had been missed. This does not necessarily mean that the development proposal did not comply with LDP Policy DM8, but that it had not been given consideration.

Measures were put in place, at the start of 2021, to ensure that Minerals Safeguarding Areas are captured as a constraint consistently. This has resulted in a marked improvement in the performance of monitoring indicator AMR22 in this annual monitoring report, compared to in AMR 2021. The three applications where the Mineral Safeguarding Area was missed as a constraint are applications validated before the measures were put in place.

Due to the improvements seen with this monitoring indicator, it is recommended that monitoring continues for a further year, the situation has now progressed towards development plan policies being implemented effectively.

SEA Topic Area:	Strategic Resources and Assets
Subtopic:	Transport Infrastructure
Indicator 23:	Number of planning applications for development that would affect strategic transport infrastructure referred onto the Welsh Government.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

This SEA Indicator is intended to monitor the performance of LDP Policy T3 – Newtown By-pass. The aim of the policy was to safeguard the area around the proposed route/s for the bypass, to ensure that those proposed route/s were not to be jeopardised by the presence of other inappropriate planning applications that could be determined before a proposed route could be secured.

However, with the route for the by-pass now secured, construction completed, and the finished road opened in February 2019, the need for the indicator has now been rendered obsolete.

Consequently, no further monitoring of this SEA indicator is required.

SEA Topic Area:	Strategic Resources and Assets
Subtopic:	Local Specific Infrastructure.
Indicator 24:	Number of developments permitted on or affecting the Sennybridge (Ministry of Defence) Training Area.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

This SEA Indicator aims to identify instances when the LDP fails to support the operational effectiveness of the Sennybridge military training area.

The training area is included within LDP Strategic Policy SP7 due to its strategic importance both in the County itself and nationally. The policy states that only development proposals that will not have an unacceptable impact on the asset/resource and the purposes for which it is safeguarded should be permitted. LDP Policy MD1 also safeguards the training area from any development that would compromise its operation and supports proposals that will sustain the operational use of the existing facility.

During this SEA monitoring period one application was permitted (21/1443/FUL) for the construction of a stoned track measuring approximately 200m in length to provide access for forestry maintenance. No comments were received by the Ministry of Defence (MOD) however, the officer considered that the development would not negatively impact upon the operation of the training facility.

This demonstrates that the compatibility in the operation of the area is being considered.

SEA Topic: Cultural Heritage

SEA Topic Area – Cultural Heritage
Objective 15: To understand, value, protect and enhance Powys’ historic environment including its diversity, local distinctiveness and heritage.
Objective 16: To protect and enhance Welsh language and culture.
Indicator 25 - Net gain or loss of historic environment designations – Listed Buildings, Scheduled Ancient Monuments, Conservation Areas, Registered Historic Parks and Gardens and Registered Historic Landscapes.
Indicator 26 - Percentage of scheduled monuments in Wales that are in stable or improving condition.
Indicator 27 - Percentage of listed buildings that are neither 'vulnerable' nor 'at risk'.
Indicator 28 - Number, percentage and distribution of Welsh Speakers.
Indicator 29 - Changes in the Welsh language skills of the population.
Indicator 30 - Percentage of the population aged 3 and over who say they can speak Welsh.

SEA Topic Area:	Cultural Heritage
Subtopic:	Historic environment
Indicator 25:	Net gain or loss of historic environment designations – Listed Buildings, Scheduled Ancient Monuments, Conservation Areas, Registered Historic Parks and Gardens and Registered Historic Landscapes.
Task:	Review of information held by PCC Built Heritage Officer / CADW.
Timescale:	Annually.

Analysis

The aim of this SEA indicator is to assess the relative impacts of LDP Policy SP7 – Safeguarding of Strategic Resources and Assets upon the historic environment designations listed. Analysis of the data held by the LPA and, where necessary, that held by Cadw, are shown in Table 41.

During the monitoring period, three changes took place under the Listed Building category.

One property named The Oxford, Llanidloes became Grade II Listed in September 2021 as a prominent, ambitious, and well-detailed Edwardian commercial building in the centre of town and for the group value with other adjacent listed items. The second property being Pentre Llifior Methodist Chapel was upgraded to II* for its special historical and architectural interest. Thirdly, Burgedin Hall at Pool Quay was delisted in April 2021 due to suffering fire damage.

A lapse in the data collection for the number of Scheduled Monuments has been adjusted in the figures for the current monitoring period (as provided by Cadw).

The overall trend shows a positive impact on SEA Objective 16 to understand, value, protect and enhance Powys’ historic environment.

Table 41. Historic Environment Designation Totals for Powys, 2021 to 2022.

Historic Environment Designation	At LDP Adoption	2018/2019	2019/2020	2020/2021	2021/2022	Net gain or loss Over last year (since adoption)
Listed Buildings	3931	3934	3932	3935	3935	0 (+4)
Scheduled Monuments (SM)	717	718	719	719	730	0 (+13)
Conservation Areas	55	55	55	55	55	0 (0)
Registered Historic Parks and Gardens	37 (consisting of 22 Grade II, 10 of Grade II*, and 5 of Grade I)	37	37	37	37	0 (0)
Registered Historic Landscapes	10	10	10	10	10	0 (0)

SEA Topic Area:	Cultural Heritage
Subtopic:	Historic environment
Indicator 26:	Percentage of scheduled monuments in Wales that are in stable or improving condition.
Task:	Review of CADW Monuments at Risk Survey.
Timescale:	Every 5 years.

Analysis

The aim of this SEA Indicator is to monitor the performance of LDP Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets, and, in particular point iii. of Criterion 2 of the policy, which relates specifically to scheduled monuments (SM). The five yearly timescale mentioned above relates to individual properties, so each scheduled monument should be assessed at least once every five years.

For this monitoring period, Cadw have provided the following information (see Table 42)

Within the county of Powys there are 952 SMs and the number of SM visited within the current (5th) round of condition monitoring is 877 (92%) and of these 877 visited 775 (88%) were assessed as not ‘At Risk’ with 583 (66%) in a stable or improving condition.

Within the Powys LDP area there are 730 SMs and the number of SM visited within the current (5th) round of condition monitoring is 655 (89%). Of the 655 visited, 590 (90%) were assessed as not ‘At Risk’ with 439 (67%) of those in a stable or improving condition.

There was no updated data available from Cadw in the AMR 2021. However, we can see that the number of scheduled monuments being assessed has increased which is a positive result. The findings have identified a downward trend in both those being assessed as not ‘At Risk’ and ‘stable or improving’ but it should be noted that not all scheduled monuments are assessed every year, so over subsequent monitoring periods a different set of scheduled monuments will be assessed, and the percentages arrived at will reflect the condition of this particular set of properties. Therefore, further monitoring is required.

Table 42. Percentage of Scheduled Monuments in Powys LDP that are in a Stable or Improving Condition.

Condition of Scheduled Monuments	2019/2020	2021/2022
No. of scheduled monuments	719	730
% assessed	77%	89%
% assessed not 'At Risk'	91%	90%
% assessed in 'stable or improving condition'	69%	67%

SEA Topic Area:	Cultural Heritage
Subtopic:	Historic environment
Indicator 27:	Percentage of listed buildings that are neither 'vulnerable' nor 'at risk'.
Task:	Review of CADW Condition and Use Survey of Listed Buildings in Wales.
Timescale:	Every 5 years (previously published 2015).

Analysis

Cadw maintains a register of listed buildings and collects data relating to the status of those structures according to the following categories;

- Categories 5 and 6 = Not at Risk
- Category 4 = Vulnerable
- Category 3 = At Risk
- Category 2 = At Grave Risk
- Category 1 = At Extreme Risk

The figures are collected from data held on Cadw's register in respect of listed buildings within the Powys LDP area. The percentage of buildings that are neither 'Vulnerable' nor 'At Risk' (i.e., categories 5 and 6 under 'Not at Risk') is 81.64%. (See Tables 43 and 44).

The results are the same as those reported in AMR 2021 as limited survey work has been undertaken by Cadw during this monitoring period. The Covid-19 pandemic severely limited the number of building inspections carried out during 2020 and 2021. The County of Powys would have had a full update in the last year or so. Now it is expected to do the full update later in the year of 2022 so new data should be available for AMR 2023.

Table 43. Percentage of Listed Buildings that are ‘At Risk, ‘Vulnerable’ or ‘Not at Risk’ in Powys (2015).

Risk Assessment	Percentage
At Risk	7.59
Vulnerable	10.76
Not at Risk	81.64

Table 44. Percentage of Listed Buildings in Powys by Risk Score (2015).

Risk Assessment	Risk Score	Percentage
At Risk	1 – At Extreme Risk	2.02
At Risk	2 – At Grave Risk	0.26
At Risk	3 – At Risk	5.32
Vulnerable	4 – Vulnerable	10.76
Not at Risk	5 – Not at Risk	31.83
Not at Risk	6 – Not at Risk	49.81

SEA Topic Area:	Cultural Heritage
Subtopic:	Welsh Language
Indicator 28:	Number, percentage and distribution of Welsh Speakers.
Task:	Review of Census information on Welsh speakers available from the Office for National Statistics in 2021. https://statswales.gov.wales/Catalogue/Welsh-Language
Timescale:	Census (2021) data available 2022.

Analysis

Based on the results of the 2011 Census, Powys contains approximately 23,990 Welsh speakers. This represents 18.6% of the total Powys population of 129,083 as recorded in the 2011 census.

With regards to their distribution within the county, the highest densities of Welsh speakers are found in the north and far south of the county. Three wards, all in the north have more than 50% of their populations describing themselves as Welsh speakers (Glantwymyn (57.8), Banwy (56%) and Machynlleth (51.6%)). There are five wards with between 40 and 49% Welsh speakers, and three of these are again in the north (Llanbrynmair (48.2%), Llanfihangel (43%) and Llanwddyn (42.7%)). There are also two wards in the far south of Powys with a similar percentage (Cwm-twrch (46.2%) and Ynyscedwyn (45.9%)). There are six wards with between 30 and 39% Welsh speakers, and four of these are found in the north (Llanfair Caereinion (36%), and Llanfyllin, Llanrhaeadr-ym-Mochnant, and Llansilin (all with 34.1%), and two again, in the far south (Ystradgynlais (39.9%) and Abercraf (38.6))

Conversely, the lowest percentages of Welsh speakers can be found in eleven wards that all contain 10% or under of their populations speaking Welsh. These are Beguildy (10%), Berriew (9.5%), Bronllys (9.7%), Churchstoke (4.3%), Glasbury (8.7%), Gwernfyed (10%), Knighton (8.5%), Llangunllo (8%), Old Radnor (6.8%), Presteigne (9.3%) and Welshpool Castle (9.9%). All of these wards are in the eastern half of the county.

As these data were collected at the last national Census in 2011, they will not change until the results of the next national Census in 2021 are published later in 2022.

SEA Topic Area:	Cultural Heritage
Subtopic:	Welsh Language
Indicator 29:	Changes in the Welsh language skills of the population.
Task:	Review of Census information on Welsh language skills available from the Office for National Statistics in 2021. https://statswales.gov.wales/Catalogue/Welsh-Language
Timescale:	Census (2021) data available 2022.

Analysis

This SEA Indicator is based upon the results of the national 2011 Census. The data is presented in Table 45 below as both a number of individuals and a percentage of the county’s population of 129,083. After the results of the next Census have been published in 2022, after approximately six or seven years of the UDP and approximately four years of the LDP being in operation, a comparison can then be made to assess the degree of change that has occurred, although it will be hard to ascribe any changes solely to the LDP and its policies.

As this data was collected at the last national Census in 2011, they will not change until the results of the next national Census in 2021 are published in mid-2022.

Table 45. Number and Percentages of People with Welsh Language Skills in Powys.

Welsh Language Skills	2011 - Number	2011 - Percentage of Powys Population
Can speak, read and write Welsh	17,724	13%
Can speak and read but cannot write Welsh	2,025	1.56%
Can speak but cannot read or write Welsh	3,932	3.04%
Can understand spoken Welsh only	8,616	6.67%
Other combination of skills	3,898	3.01%
No Skills	92,888	71.95%

SEA Topic Area:	Cultural Heritage
Subtopic:	Welsh Language
Indicator 30:	Percentage of the population aged 3 and over who say they can speak Welsh.
Task:	Review of Welsh Government Annual Population Survey estimates. https://statswales.gov.wales/Catalogue/Welsh-Language/Annual-Population-Survey-Welsh-Language/annualpopulationsurveyestimatesofpersonsaged3andoverwhosaytheycanspeakwelsh-by-localauthority-measure
Timescale:	Annually.

Analysis

Based on the results of the Welsh Government Annual Population Survey for the year ending 31st December 2021, Powys contained approximately 34,300 people, aged three or over who said they could speak Welsh. This represents 27% of the total population of 127,100 people in Powys who are aged three or over.

Table 46 shows these figures alongside the same for the previous three years. These results show a slight decrease of 500 people in the size of the Powys population who are aged three or over, alongside an increase of 4,600 people who say they can speak Welsh, all in just a 12-month time period.

The Annual Population Survey (APS) is carried out using a representative sample of 18,000 households selected randomly from across Wales according to certain characteristics (e.g., address, age etc). With a different selection of households being used each year the results may show fluctuations which may account for the relatively large differences that these results are showing. Whilst the APS is not the more thorough and comprehensive National Census that is carried out every 10 years, they also consistently show a higher proportion of people who say they can speak Welsh.

Interestingly, the numbers/percentage of people who speak Welsh in Powys for the year ending 2021 seemed to have recovered since the reduction in 2020, almost back to the level it was in 2019. Whilst there has been an overall downward trend since the LDP was adopted, the results for this monitoring period are more positive and indicate that numbers/percentage are starting to increase again.

The Census 2021 data relating to Welsh language, when it's released later in 2022, will give more definitive data on this.

Table 46. Percentage of Powys Population, Aged Three or Over, Who Can Speak Welsh.

Year	Population aged 3 or over	No of these who can speak Welsh	Percentage of Population aged 3 or over who can speak Welsh
2021	127,100	34,300	27.0%
2020	127,600	29,700	23.3%
2019	126,900	34,600	27.3%
2018	125,900	37,500	29.9%

SEA Topic: Landscape

SEA Topic Area – Landscape

Objective 17: To protect and enhance Powys rich natural landscape.

Indicator 31 - Area (ha) / proportion of development permitted that falls outside of development boundaries and is within LANDMAP aspect areas classified as outstanding / high quality.

Indicator 32 - Proportion of outstanding / high quality aspect areas identified in LANDMAP.

SEA Topic Area:	Landscape
Subtopic:	Natural Landscape
Indicator 31:	Area (ha) / proportion of development permitted that falls outside of development boundaries and is within LANDMAP aspect areas classified as outstanding / high quality.
Task:	Review of PCC Development Management information.
Timescale:	Annually.

Analysis

Analysis of the four* LANDMAP layers (Geological Landscape, Landscape Habitats, Visual and Sensory and Historic Landscape) against the planning applications permitted in the monitoring period provided the following results:

The total area of land within the LDP area evaluated as ‘High’ or ‘Outstanding’ value, in at least one of the aspect areas of the four different LANDMAP layers, equates to 414,237 ha. The total area covered by the LDP equates to 428,930ha, therefore 97% of the total LDP area is covered by at least one aspect area evaluated as being of either High or Outstanding value.

During the monitoring period 441 planning applications were granted permission for proposals located outside of a development boundary (i.e., not in a Town or Large Village), covering an area of 609.29ha (one major application (21/0559/OUT) accounted for 354.44ha). Of the 441 applications, 419 were within in either a high or outstanding aspect area covering a total area of 604.91ha (again one major application accounted for 354.44ha).

The results show, that 99.28% of the applications permitted were within at least one aspect area evaluated as being of high or outstanding value. However, when these aspect areas themselves cover 97% of the total LDP area this outcome is almost inevitable. As stated in previous SEAs, the usefulness of this indicator is questionable and should be reconsidered as work commences on the next LDP.

*As detailed in LANDMAP Guidance Note 2 published by NRW on the 8th of June 2020, the Cultural Landscape LANDMAP layer has been replaced by the Cultural Landscape Services LANDMAP layer which is not subject to the aspect areas being evaluated.

SEA Topic Area:	Landscape
Subtopic:	Natural Landscape
Indicator 32:	Proportion of outstanding / high quality aspect areas identified in LANDMAP.
Task:	Review of NRW LANDMAP data: https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en
Timescale:	Every five years.

Analysis

This indicator aims to measure how well the Landscape policy (DM4) performs in protecting the different characteristics of the Powys landscapes.

The five different layers that make up LANDMAP have not been reviewed by NRW since the SEA monitoring report in AMR 2019, so there is no change to report in this monitoring period. For ease of reference percentages published in AMR 2019 are shown in Table 47.

Whilst this data does not provide any insight into the effectiveness of LDP Policy DM4 - Landscape at this stage, it does provide a baseline for monitoring the policy moving forwards, once further, five-yearly reassessments of the aspect areas have been conducted.

NB: The Cultural Landscape Layer is no longer evaluated into ‘High’ or ‘Outstanding’, therefore this layer has been omitted from analysis.

Table 47. Percentage of Aspect Areas within, or intersecting, the Plan Area that are of ‘High’ or ‘Outstanding’ Quality.

LANDMAP layer	Percentage of Aspect Areas in ‘high’ or ‘outstanding’ quality
Geological Landscape	34%
Landscape Habitats	45%
Historic Setting	55%
Visual and Sensory Landscape	38%

SEA Topic: Geodiversity

SEA Topic Area – Geodiversity
Objective 18: To protect Regionally Important Geo-diversity Sites (RIGS) from incompatible development.
Indicator 33 - Number of RIGS and Geological Conservation Review sites.
Indicator 34 - Number of developments permitted on or affecting RIGS or Geological Conservation Review sites.

SEA Topic Area:	Geodiversity
Subtopic:	Regionally Important Geodiversity Sites (RIGS)
Indicator 33:	Number of RIGS and Geological Conservation Review sites.
Task:	Review of information from JNCC, Central RIGS Group and South East Wales RIGS Group: http://jncc.defra.gov.uk/default.aspx?page=4177&authority=UKL24 http://www.geologywales.co.uk/centralwales-rigs/ https://sewrigs.wordpress.com/
Timescale:	Annually

Analysis

This SEA Indicator aims to monitor the performance of LDP Policy DM2, particularly with regards to the Regionally Important Geodiversity Sites (RIGS) and Geological Conservation Review Sites (GCRS) that are the subject of Criterion “C” of Section 3 of the policy.

RIGS

According to Lle and Powys County Council (PCC) held data, there is a total of 104 RIGS within the Powys LDP area, with three of these being cross boundary with the Brecon Beacons National Park and two cross border with Shropshire.

GCRS

The Lle and PCC data sources revealed a total of 80 GCRS within the County of Powys, of which 27 were located within the Brecon Beacons National Park. This results in a total of 53 GCRS within the Powys LDP Planning Area, which includes six that are listed under neighbouring counties as these either share a boundary with, or partially extend into, the County of Powys.

SEA Topic Area:	Geodiversity
Subtopic:	Regionally Important Geodiversity Sites (RIGS)
Indicator 34:	Number of developments permitted on or affecting RIGS or Geological Conservation Review sites.
Task:	Review of PCC Development Management information.
Timescale:	Annually

Analysis

LDP Policy DM2 - The Natural Environment provides protection for a range of sites, habitats and species that are designated at international, European, national and local level. This SEA Indicator aims to test the policy’s ability to protect the locally important site designations listed under section 3 of the policy, namely Regionally Important Geodiversity Sites (RIGS) and Geological Conservation Review Sites (GCRS). Within the Powys LDP area, there are 104 RIGS and 53 GCRS.

In the monitoring period (1st April 2021 to 1st March 2022) a total of five individual applications have been permitted, which were close to a RIGS or GCRS. Analysis of these applications revealed the following information.

There were three applications that were close to a Regionally Important Geological Site and for all three, the Officer’s Report clearly identifies the RIGS in question which were identified by Ecologists and Contaminated Land officers. Planning conditions have been placed on the permissions for further environmental and contamination investigations to be carried out prior to any works taking place.

The remaining two applications were close to a GCRS. Of these the Officer’s Reports did cite nearby SSSIs which were identified as planning constraints. Both the SSSIs in question were designated for their geological interest because of their status as a GCRS. Both applications were identified by consultees and concluded that no impact would arise from the applications being permitted.

Note - this indicator is similar to AMR Monitoring Indicator 45.

7. Conclusion and Recommendations

7.1 Contextual Changes

7.1.1 During the monitoring period of this Annual Monitoring Report, contextual changes included the insertion of Regulation 16A into The Conservation of Habitats and Species Regulations 2017, meaning that SACs and SPAs are no longer considered as European Sites but now form part of the National Site Network, the natural heritage policies in the Replacement LDP will be drafted to reflect this change.

7.1.2 Decarbonisation, climate change and sustainability continue to be Welsh Government priorities that will need to be considered in the Replacement LDP. Strategies and guidance published within the monitoring period relate to the Net Zero Wales Carbon Budget (2), reducing waste, guidance on adapting to climate change with regards to risks from flooding and coastal erosion, all Wales transport and electric vehicle charging strategies and Active Travel guidance.

7.1.3 The monitoring period saw the introduction of Flood Map for Planning (FMfP) with an amended, Technical Advice Note 15 (Development, Flooding and Coastal Erosion) anticipated to be published in June 2023. The new FMfP is of significance as the flood map includes an allowance for climate change. This means that there are some housing allocations and areas of settlements previously not thought to be impacted by flood risk, that now in terms of policy, need to be treated as being within an area of flood risk. To aid the LPAs understanding of the implications of FMfP and to inform the Replacement LDP a Strategic Flood Consequences Assessment is in the process of being undertaken.

7.1.4 A new approach to undertaking Local Housing Market Assessments (LHMA) was introduced by Welsh Government during the monitoring period. The Council will be using this new approach in order to undertake a new LHMA for Powys for the period 2022-2037 (which will align with the proposed plan period for the Replacement LDP). This is an essential piece of evidence that will inform the strategy and dwelling requirement figure in the Replacement LDP.

7.1.5 In January 2022, the Final Deal Agreement of the Mid Wales Growth Deal was signed by the Welsh Government, UK Government, Powys County Council and Ceredigion County Council. It marked the commitment of all partners to deliver the Mid Wales Growth Deal, bringing a combined investment of £110 million from UK and Welsh Government. The Growth Deal is expected to lever in significant additional investment from other public and private sources maximising the impact in the Mid Wales region. The progress of the Mid Wales Growth Deal and associated work will be taken into account in preparing the Replacement LDP.

7.1.6 The impact of phosphates in riverine Special Area of Conservation catchments in the LDP area is beginning to affect decision-making on some residential and tourism developments (that involve overnight stays). These developments have the potential to increase phosphorus discharges and are being delayed whilst solutions are sought. Exceptions are where new (usually infill) development has combined and replaced existing septic tank systems with a modern package treatment works and has thus been able to demonstrate betterment. This constraint will be a significant consideration in the preparation of the Replacement LDP.

7.2 Recommendations and Findings Arising from the Monitoring Indicators

7.2.1 The results from the analysis of the monitoring indicators for the monitoring period, indicate that the LDP policies are largely delivering and meeting the targets set out in the Annual Monitoring Framework, with 42 of the 62 monitoring indicators showing positive policy implementation. This includes nine Supplementary Planning Guidance documents being published since the LDP was adopted. With this level of monitoring targets achieved, it demonstrates that the majority of the policies in the Powys LDP, adopted in 2018, have delivered successfully on the sustainable growth and many of the land use objectives the LDP sought to achieve.

7.2.2 It is recognised that the cumulative number of net additional dwellings delivered (2,470 dwellings) is below what was anticipated (3,036 dwellings), by this period in the lifetime of the adopted LDP, giving a shortfall of 566 dwellings at the end of this monitoring period. There are only four years remaining of the plan period therefore it is unlikely, particularly as this is the only one year that the annual completion rate has met the annual dwelling requirement figure, that 4,500 new dwellings will be delivered to meet the LDP dwelling requirement figure by the end of the plan period (March 2026). The LDP growth strategy is primarily led by housing growth, therefore the poor performance in monitoring indicators (AMR2a, AMR2b) that relate to housing completions demonstrate that the Plan's strategy is not being delivered. During the preparation of the Replacement LDP the dwelling requirement figure will be revised. This will include looking at the latest evidence relating to past build rates, population projections and evidence of need in the Local Housing Market Assessment (LHMA).

7.2.3 There are 80 Housing Allocation sites in the LDP, of which 54 (68%) do not have any form of planning permission (monitoring indicator AMR4). With regards to the number of net additional dwellings delivered on allocated housing sites, monitoring indicator AMR5 sets out an annual target. The cumulative total of the annual completion target of additional dwellings to be delivered on allocated sites, over the four years since LDP adoption equates to 1,217 dwellings. The actual number of dwellings delivered on allocated housing sites over the four-year period was only 155 dwellings, meeting just 13% of the target. The trajectory included in monitoring indicator AMR2a demonstrates how allocated sites have the potential and are fundamental towards the delivery of additional dwellings to meet the dwelling requirement.

7.2.4 Out of the 80 housing allocation sites, 22 are located within a phosphate sensitive riverine Special Area of Conservation (SAC) catchment. This means that the necessary planning permissions cannot be granted unless applications are able to demonstrate phosphate neutrality or betterment. Which, without the local sewage wastewater treatment works having phosphate stripping (and the associated permit) in place is not currently possible.

7.2.5 As part of the preparation of the Replacement LDP there will be a 'call for sites', whereby any party will be able to put forward a site (candidate site) to be considered for development. All sites submitted will be assessed to determine if they are sustainable, deliverable and viable in accordance with the Development Plans Manual (Edition 3) and the emerging strategy in the Replacement LDP. The site assessment process will determine which of the submitted candidate sites should progress to become allocations in the Replacement LDP. Allocations in the adopted LDP that do not have an extant planning

permission will need to be submitted during the call for sites and will be assessed alongside the rest of the submissions.

7.2.6 The AMR has identified that the LDP policies relating to retail frontages, solar Local Search Areas, community/district heating schemes and protection of community facilities and services are not being implemented as intended. The preparation of the Replacement LDP will be used as an opportunity to review these policies in light of the latest national guidance, and to gain an understanding of the reasons why each policy was not implemented as expected and to amend as necessary.

7.2.7 There are six areas where it is recommended that further investigation or research is required:

- Monitoring indicator AMR21 - considers housing density, the trigger for this indicator has been reached in respect of Large Villages. Further investigation/research to inform the approach towards housing density across settlement tiers and development types, as part of the Replacement LDP process is required.
- Monitoring indicator AMR20 - considers the distribution of windfall developments on greenfield sites across the settlement tier. The findings from the analysis of this monitoring indicator revealed that the Plan area has seen a growth in the number of tourism units (holiday chalets, static caravans, glamping pods etc.) on greenfield sites in the Open Countryside. As the trigger for this monitoring indicator has been reached research is required to look at the cumulative effect on the environment together with the economic benefits to the Plan area of such developments.
- Monitoring indicator AMR19 - found that the proportion of employment land permitted in the lower tiers of the settlement hierarchy has exceeded the target for two consecutive years. Research will need to be undertaken, that includes reconsidering targets and the spatial strategy with regards to employment development.
- Monitoring indicator AMR16 - relates to the retail element of mixed-use allocation P51 MUA1. There have been no pre-application enquires or planning applications submitted to date. Therefore, it is recommended that further investigation may be necessary to determine the site owners' intentions and to try to pro-actively progress the delivery of a retail development to address the retail needs identified in the Plan.
- Monitoring indicator AMR15 has recorded that the total amount of employment land permitted on allocated sites has been below the cumulative requirement of four hectares for two consecutive years. Research will be undertaken as evidence to support the preparation of the Replacement LDP, this will include reconsidering the employment land provision and allocated sites.
- Monitoring indicator AMR9 considers viability, in view of the sensitivity of viability to value and cost factors and the current uncertainty around some of these elements, it is considered that further investigation and research around these factors will be necessary to inform the Replacement LDP.

7.2.8 All research / further investigation undertaken will be undertaken as evidence to inform the preparation of the strategy, policies and proposals in the Replacement LDP and will be published alongside the consultation versions of the emerging Replacement Plan.

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CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE****11th October 2022****REPORT AUTHOR: County Councillor Jake Berriman, Cabinet Member for a Connected Powys.****REPORT TITLE: Annual Information Governance Report 2021-2022**

REPORT FOR: Information

1. Purpose

1.1 To brief Cabinet on the on the Information Governance (IG) activities undertaken, practices implemented, and the standards of IG compliance achieved for the financial year 2021/2022

2. Background

2.1 Powys County Council has in place an Information Management, Assurance, Governance (IMAG) plan to initiate, develop, and monitor policies and practices in relation to information security, information management, and information risk, to ensure compliance with relevant information legislation and standards.

2.2 This report is supported by the following appendices,

- Appendix 1 – ICO Enforcement training graphs
- Appendix 2 - Information security incident breakdown

3. Information Management Assurance and Governance (IMAG) Plan

3.1 The 2021-2023 IMAG plan was agreed by the Corporate Information Governance Group (CIGG) in March 2021. The plan details the execution of activity and objectives to improve IG practices within the Council. It also identifies and manages the ongoing IG work that takes place to maintain levels of compliance with information legislation, and standards of good practice.

3.2 As of the 31st of March 2022 there were 61 elements to the plan,

- 23 had been completed (38%), Such as the development and release of training over the investigation of personal data breaches, development of an action plan in response to SWAP report on the Council's management of electronic information, implementation of electronic Subject Access Request (SAR) processes, a revision of CIGG's Term of Reference (ToR), Training of staff and IG key roles
- 32 were in progress and still within the revised timescales (52%),
- 2 elements not likely to be completed within timescales (3%), including the development of guidance over Members access to information,

- 3 were out of timescales (5%), which included the elements of a review of the current Data Protection Impact Assessment Template, review of the Regulations of Investigatory Powers Policy (although the revised Policy was approved by EMT on 8th August 2022 and was approved the relevant portfolio holder/ Cabinet in September 2022), the development of and implementation of an Information Request automated workflow app, and the creation of an exercising of data protection rights policy for the public.

3.3 Three CIGG meetings have taken place in the year where the implementation of elements of the plan are considered, and challenged where timescales have not been met, and areas of concern discussed, with actions required identified. These meetings are chaired by the Senior Information Risk Owner (SIRO), and take place quarterly, in line with the group's ToR.

3.4 Additionally, regular Corporate Information Operational Group Governance (CIOG) meetings have taken place, involving representatives of the Information Asset Owners (IAOs), to discuss and monitor IG matters and measurements and to carry out work activities as directed by the CIGG.

3.5 CIOG meet every 6 weeks, and 8 meetings have taken place through the year.

4. **ICO Enforcement Training**

4.1 In December 2012 the Information Commissioner (ICO) issued an enforcement order against Powys County Council requiring that all staff with access to personal data undertake training in the basics of the data protection and also the organisation's information policies, every 3 years. The Council's response to this enforcement order is via mandatory Cyber Security and GDPR training on an annual basis.

4.2 In April 2021 the compliance reporting for this training was automated to improve the provision of compliance data directly to managers within dashboards, alongside other mandatory training reports, thus assisting their management of their staff's training compliance.

4.3 Compliance details (Departmental breakdowns at Appendix 1)

	2 nd April 20	1 st April 21	31 st March 22	1 st April 22
Number of staff requiring training	2,391	3015	3254	3208
Number of staff trained	1,812	2314	2374	2369
Compliance rate	75.78%	76.7%	73%	74%
Number of Members requiring training				84
Number of Members trained				66
Compliance rate				78.6%
Target Compliance rate	95%			

Overall training compliance figures continue to form part of the IG measurements provided to CIGG.

4.4 A number of services who have higher levels of staff who do not use computers, at least not on a regular basis as part of their role, are following other avenues of undertaking this training, such as manual workbooks, small meetings etc. Their compliance rates are being monitored, by the CIGG in addition to their Head of Service who have access to the training data through the dashboards.

4.5 A Cyber Security and GDPR training course specifically created for Council members has been made available from May 2022 coinciding with the election of many new Council members and formation of the new Council and Cabinet.

5. Information Security Incidents

5.1 The Council has had robust personal data breach reporting and management processes in place, for a number of years, which continues to ensure swift containment action, informed identification of information risks and mitigation, and supports relevant reporting obligations, to both the regulator and data subjects.

5.2 The table below provides details of incidents and personal data breaches, and comparison data from last year.

	2020/2021	2021/2022
Numbers of reported incidents	220	263
Number of personal data breaches	115	149*
Number of incidents reported to the ICO	7	11
Number of notifications to data subjects	5	0
Number of separate complaints made to the ICO over personal data breaches	3	4
Number of DPA breaches occurring externally	70	90
Number of DPA breaches occurring internally	44	57
Number of DPA breaches involving sensitive personal data	20	43
Number of DPA breaches contained	89	126

* using the definition of a personal data breach within GDPR. A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in connection with the provision of a public electronic communications service.

5.3 A breakdown of service area & information security incident types is provided at Appendix 2.

5.4 There has been an increase of 19% in the numbers of information security incidents reported and of those incidents an increase in personal data breaches of 29%.

5.5 There has been an increase of 4 personal data breaches reported to the ICO, and an increase by 1 of complaints received directly from the ICO.

5.6 An analysis of incidents reported do not show any particular reason for the increases.

5.7 Reports of information security incidents are regularly made to CIGG, and CIOG and staff are made aware of the need to report incidents and breaches through notices and reminders in relation to the incidents that have occurred. A training resource has been developed on how to investigate personal data breaches, since these are undertaken by the services, with support from the Information Compliance Team.

5.8 Those personal data breaches reported to the ICO include a misdirected grievance pack, publication of information on the web, data handling, recording, and accessing issues, and the unauthorised disclosure of information.

5.9 In all but one case the ICO has found that the Council breached data protection legislation, though has recognised that in most cases this has been due to human error in failing to follow organisational measures put in place to prevent breaches of personal data, rather than the Council not having the necessary measures in place.

5.10 Whilst no regulatory action, such as fines or enforcement orders, have been made against the Council, where the ICO has recommended further improvements, such as service/role specific training, checking processes employed, then these are implemented by the relevant service area or organisation as appropriate.

5.11 It was agreed during the year that these recommendations would form part of the Council's Regulatory Tracker, entries are now ready for approval from the SIRO, and upload for Qtr. 1 22/23

5.12 The ICO has provided 33 recommendations, within their decision notices. At this time, 23 have been implemented, and 10 are in progress of implementation. The implementation of recommendations may also be part of wider pieces of IMAG planned activities.

5.13 Some recommendations are repeated through different ICO decisions.

5.14 The four complaints made directly to the ICO relate to disclosure of information, information handling practices, and transparency of processing. In three of the four cases a breach of personal data had occurred. Where the Council was found to have breached personal data then two recommendations for improvements were made.

5.15 The reporting and management of information security incidents and personal data breaches continues to allow the Council to identify areas of vulnerability and information risk, enables the development and introduction of relevant policies, processes, and or training in order to reduce the likelihood of the vulnerability being further exploited and causing a serious breach of data

protection legislation, or affecting the integrity and availability of important information assets.

5.16 Processes in place ensure that the cyber security and information compliance areas complement each other when responding to cyber incidents which also affect personal data.

6. Information Requests

6.1 There were 1109 valid information requests covering the Freedom of Information Act (FOI) 2000, Environmental Information Regulations (EIR) 2004, or the UK General Data Regulations Subject Access Request (SAR) information regimes, this is against 1000 last year, an increase of 11%

6.2 The Information Commissioner has previously indicated that there is an expectation of a 90% compliance rate.

Information Regime	Numbers received	Compliance rate	Compliance up or down (percentage points)
FOI	788	84%	-4%
EIR	232	90%	-4%
SAR	89	63%	+6%
Overall	1109	83%	-2%

6.3 Where records indicate reasons for non-compliance with FOI/EIR timescales, then,

- 89% of non-compliant responses were due to delays by the service areas.
- 8% of non-compliant responses were due to delays by the Information Compliance Team themselves. Primarily due to large / complex requests requiring inspection, redaction and /or decisions over the application of exemptions.
- 3% of non-compliance was due to other factors.

6.4 Based on the data in paragraph 6.3 above then had the only delays experienced been by the Information Compliance Team then the organisational compliance rate for FOI/EIRs could have been around 98%.

6.5 Reports detailing reasons for lateness, are supplied to CIGG.

6.6 These figures do not apply to UK GDPR SARs since the delays experienced are predominantly due to the Information Compliance team. Most SARs involve large volumes of files, records, emails, documents etc, covering many years, which have to be prepared, examined, and considered for disclosure, and redacting information, where deemed not appropriate for disclosure or not the personal data of the requester.

6.7 During the year the team have not only actioned more SARs, and improved the disclosure compliance rate, but have also reduced the number

of out of timescale SARs outstanding, figures below show those outstanding at as of 16th May 2022.

Year	Number O/S	Comments
2018	1	Being undertaken in batches and the DPO is in communication with requestor.
2019	0	
2020	1	
2021	6	

6.8 The deterioration in compliance rates for FOI and EIR requests can be attributed to

- Increased number of information requests over the three regimes
- Reduction in the numbers of Information Compliance Officers in the year
- Increased number of instances where delays were experienced in obtaining information to enable a response to the FOI /EIR request to be issued.
- Concerted efforts to reduce the number of historical SARs outstanding

6.9 Details of complaints over information requests

Complaint to Powys County Council – internal review	17 (↓6)	Complaint made directly to the ICO	3 (↑1)
Over lateness	1		2
General disagreement with response	13		1
Application of exemption	3		
Outcome – complaint not upheld	7		
Outcome – complaint upheld	0		3
Outcome – complaint partially upheld	7		
Still under consideration at 31-03-21	3		
Still under consideration from previous years	1 (2019)		

7. Resources Available

7.1 The Information Compliance Team delivers the majority of the Council's information governance functions, including that of a designated Data Protection Officer, for the Council, and a DPO for Schools Service. All formal information requests are handled, managed, and responded to by the Team.

7.2 The Team now comprises of 3 Information Compliance Officers, 1 Information Compliance Manager, 1 Assistant Data Protection Officer, and 1 Professional Lead Data Protection.

7.3 During the year a review of the team was implemented, taking account of the responsibilities, and required knowledge and skills of the staff, providing development opportunities and succession planning, in addition to releasing expected savings from the development of an automated workflow App, which has not yet been implemented. The number of Information Compliance Officers reduced from 5 to 3, but with an increase of grade commensurate with job description, and the implementation of the Assistant DPO post and deletion of the DPO school's post.

7.4 Due to this review the Professional Lead Data Protection now undertakes both DPO and IG activities, and is also the designated DPO for Schools, in addition to the roles of Regulation of Investigatory Powers Act 2000 (RIPA) Co-ordinator, and Senior Responsible Officer for Camera Surveillance.

8. Data Protection Officer

8.1 All public authorities, including each school as a public authority in its own right, are required to have in place a designated Data Protection Officer whose position and tasks are detailed within legislation.

8.2 In addition to the provision of advice and support, the DPO undertakes its monitoring responsibilities through reporting processes, and whilst working closely with service areas providing advice & support, managing the mandatory assessment of data protection risks for new ways of working, clear desk audits, compensation analysis or projects (Data Protection Impact Assessment), SWAP Audit reports, etc.

8.3 The DPO over sees the reporting, investigating and management, of personal data breaches and where the breach is of such seriousness ensures notification to the ICO, and if required, due to the level of seriousness undertakes the necessary investigations.

8.4 Involvement in local and national groups considering and managing the data protection issues around the use of personal data to support the NHS Test Trace and Protect and the Welsh Government's Homes for Ukrainians service, and the Council's wider response to these issues, such as information sharing agreements, analysis and development of dataflows, and Data Protection Impact Assessments etc

8.5 A separate annual report is developed for Schools.

9. Cyber Security

9.1 The Cyber Team consists of 2 members of staff who provide the service solely for the Council, until October 2021 this was a role which was split across the council and the Health Board but due to increasing workloads

and demands on the Cyber Security Service additional resource has been sought within the Health board to cover that role. Cyber security is no longer part of the Section 33 agreement.

9.2 In January 2022 the Council achieved Cyber Essentials Plus and IASME Gold accreditations for the 3rd year running. It is intended that the council will continue to maintain the standard and seek accreditation annually.

9.3 Cyber Essentials is a Government-backed, industry-supported scheme to help organisations protect themselves against common online threats. The certification enables organisations to reassure customers, partners, and other business that cyber security is taken seriously. The Information Assurance for Small to Medium-sized Enterprises (IASME) was designed as a security benchmark enabling organisations to assess the level of their information security maturity, against a set of nationally recognised standards. IASME Gold accreditation involves on site audit on the level of information security provided by the organisation.

9.4 The Council continues to achieve its PSN compliance status, allowing the sharing of Data with Central Government departments such as the DWP.

9.5 During the Covid Pandemic, the shift to homeworking for the majority of staff was achieved due to previous planning to enable sufficient and secure remote working practices. Additional Security was added to end user devices to enable them benefit from using their home broadband and still achieving the same level of Security protection as they would when connected to the Corporate network. A shift towards Zero Trust networking and Secure Access Service Edge (SASE) technologies is emerging as the council moved more to adopting Cloud technologies and Software as a Service. Additional Security tooling and software has also been adopted to further enhance and improve their Cyber Resilience as a result of capital investment into Cyber Security.

9.6 Additional Staff awareness and training specifically in detecting and reporting Phishing Emails has been undertaken towards the end of 2021 beginning of 2022, the outcome of which indicates that we still have further improvement required in this area.

9.7 The Cyber Security Manager continues to work on improving and reviewing Cyber Incident Response plans and with Senior Leadership Team involvement has undertaken a Cyber Incident Response exercise in March 2022. This was achieved using Welsh Government funding in Cyber Resilience in order to collaborate with an external organisation to deliver and facilitate the exercise. The Cyber Response plan continues to be developed and will be a key part of the Cyber Resilience Strategy.

9.8 Cyber Resilience reports are prepared quarterly for the attention of the Executive Management team, highlighting achievements, plans, issues and risks over the previous quarter.

10. DPO for Schools Service

10.1 The Information Compliance Team also deliver a DPO service and IG support for each of the Schools in Powys, rather than each having to employ individual DPOs.

10.2 The Head of Schools Services is provided with an annual DPO for Schools report, in line with the school year. The 2020-2021 report having been issued in January 2022.

10.3 Advice and support provided has been in relation to actioning SARs, and other data protection rights, with DPIAs being undertaken on Apps used by schools, and the use of data intermediaries, and appropriate agreements being developed to support the sharing of personal data. Monitoring responsibilities are delivered through working with individual schools. In addition to the management and undertaking of investigations where necessary, in particular those relating to a number of cyber incidents which occurred through a number of high schools.

10.5 Work delivered by the DPO schools service is included within reports to CIGG quarterly, even though for the purposes of data protection they are separate controllers.

11. Information Management Service

11.1 Service delivery on site for Information Management has continued uninterrupted throughout the pandemic. 406 file requests have been completed and returned to services in 2021/22. These have been sent in the main in hardcopy, but some smaller files have been scanned and sent electronically to staff who are homeworking.

11.2 Hard copy file collections have also resumed with staff collecting 251 boxes from around the county.

11.3 12,595 hard copy files have been destroyed in accordance with the corporate retention schedule.

11.4 The service level agreement with Powys Teaching Health Board continues and 849 file requests were received in 2021/22, and 7,888 boxes of records in total are now stored and managed by Information Management on behalf of Powys Teaching Health Board.

11.5 Staffing levels within the service have continued to be problematic with recruitment of professional staff challenging. Powys Archives and Information Management operate a fully integrated staffing structure, and service delivery of the archive service has also been affected. Further attempts will be made to recruit an Archives Manager and Archives Officer in 2022.

12. Conclusion

12.1 Powys County Council continues to take steps to progress and improve its information management, assurance and governance policies, procedures,

and practices. The work being undertaken towards compliance with data protection legislation and other information legislative regimes must continue, in order to reduce information risk, likelihood of regulatory action, and to support the Council's vision of being an open and enterprising Council.

12.2 Personal data is intrinsic to much of the Council's activities, and public trust and confidence in the organisation's ability to manage and use their information appropriately is essential.

12.4 Staff awareness of information governance and compliance matters continues to improve, with a resultant rise in enquiries, requests for complex advice, and the nature and types of information security incidents being reported.

12.5 Senior Information Risk Owner's statement of assurance.
Partial Assurance - We are able to offer partial assurance that the council's arrangements adequately reflect the principles of good information governance. Some key risks are not well managed, and processes require the introduction or improvement of internal controls and resources to ensure effective governance but plans for future improvement are in place and are monitored by CIGG.

13. Planned Activity 2022-2023

- Continue with the development of information requests automated workflow processes and reporting, including chasing and recording of non-compliance rates and reasons. To include the provision of information directly to management dashboards, public reporting of compliance rates, and disclosures logs. Supported by a revised publication scheme and web pages.
- Continue to monitor training compliance rates.
- Continued implementation of IMAG plan, in particular developing funding applications to enable undertake reviews of Information Asset Registers, and so build into the Council's Record of processing activities and management of information.
- Continue close working relationships with cyber security staff, to ensure both technical security standards and information governance issues are addressed in tandem.

14. Resource Implications

14.1 The Deputy Head of Finance acknowledges the report and confirms there are no financial implications.

15. Legal implications

15.1 Legal; the recommendations can be supported from a legal point of view.

15.2 The Head of Legal and Democratic Services (Monitoring Officer) notes the report and has nothing further to add.

16. Data Protection

16.1 The Data Protection Officer is the author of this report and has nothing further to add.

17. Comment from local member(s)

17.1 NA

18. Integrated Impact Assessment

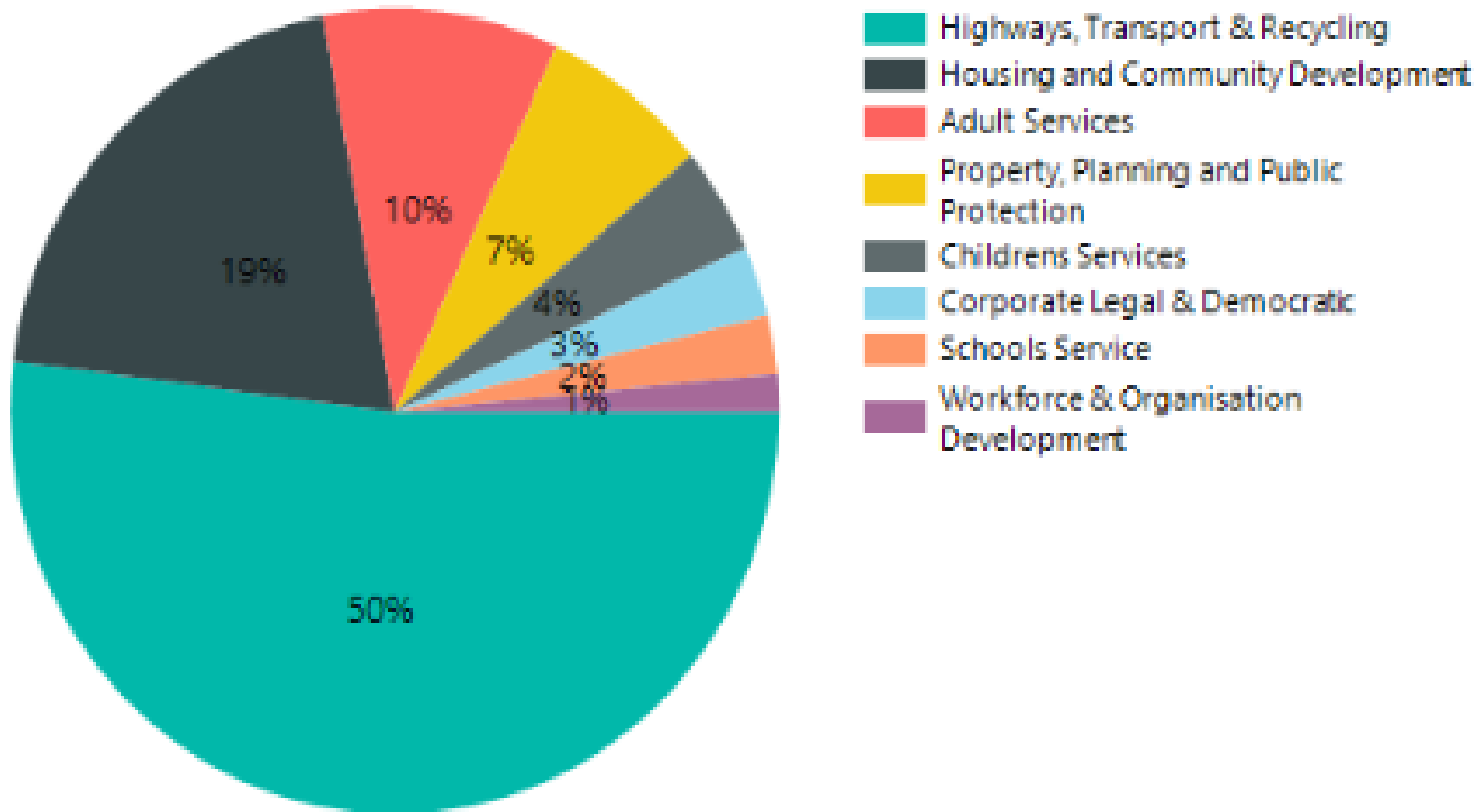
18.1 NA

19. Recommendation

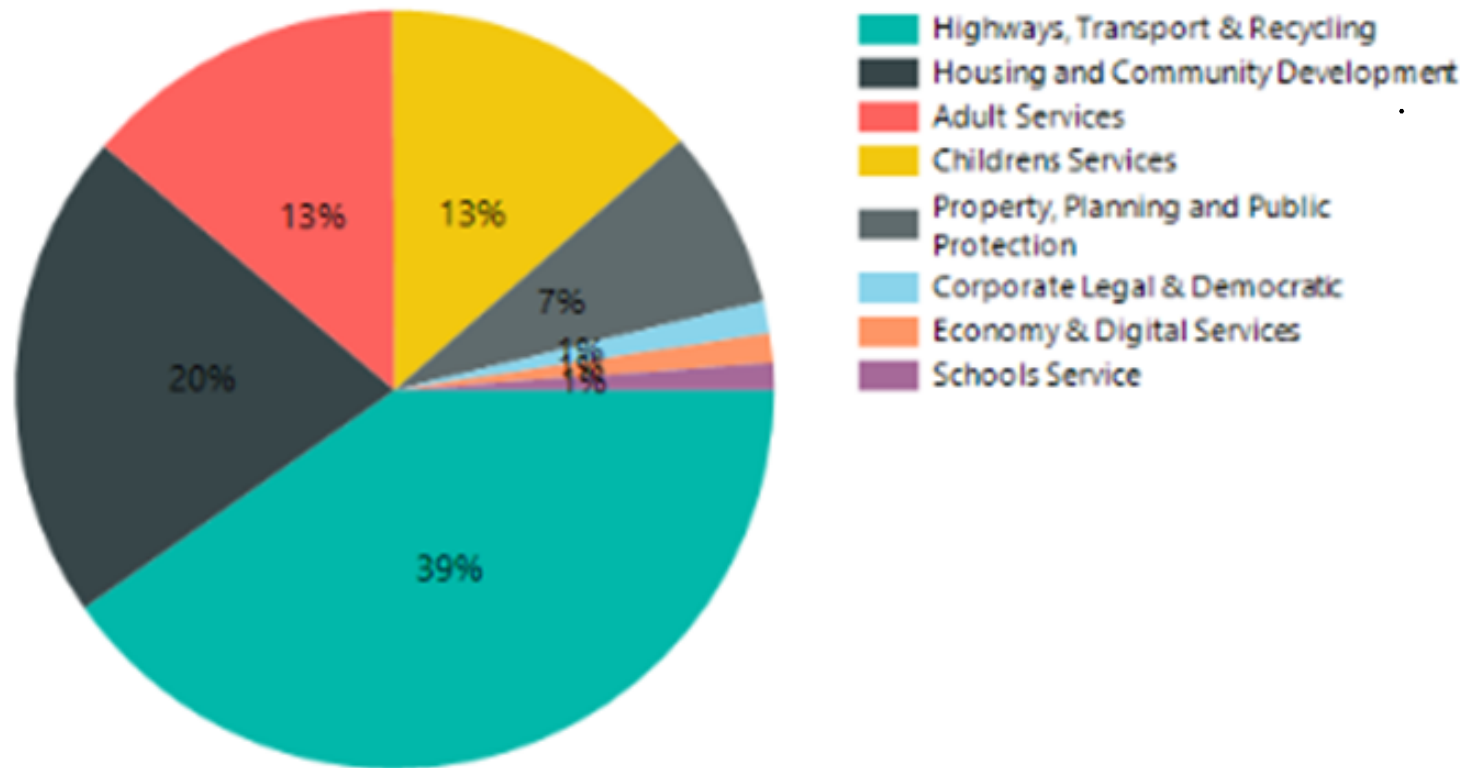
19.1 Cabinet notes the assurance set out in 12.5 and the planned activity for 2022-2023 as set out in paragraph 13.

Contact Officer: Helen Dolman Tel: 015697 826400 Email: helen.dolman@powys.gov.uk Head of Service: Diane Reynolds Corporate Director: Emma Palmer

Contribution to Organisational Non-Compliance by Service Area (Top 8)



Contribution to Organisational Non-Compliance by Service Area (Top 8)



Information security incident breakdown

Service Area	Numbers of incidents
Adult Services	34
Childrens Services	76
Commissioning	4
Digital Services	14
Finance	26
Housing & Community Development	15
HTR	7
Legal and Democratic services	9
Other	7
Property, Planning and Public Protection	24
Schools Services	21
Transformation and Communications	3
Workforce & organisational Development	23

Type of Incident	Numbers
Complaint	16
Cyber factor	5
Inappropriate access	10
Inappropriate processing of data	14
Information rights	25
Integrity of information	10
Loss of information	9
Loss/theft of equipment	1
Other	6
Physical Security	4
Unauthorised disclosure (External)	106
Unauthorised disclosure (Internal)	57

Cabinet / Delegated	Decision Date	Title	Portfolio Holder	Lead	Decision Maker	Scrutiny
	08/11/22	Revenue Outturn as at 30 September	Councillor David Thomas	Jane Thomas	Cabinet	
	08/11/22	Capital Programme Update as at 30 September	Councillor David Thomas	Jane Thomas	Cabinet	
	08/11/22	Ysgol Cribarth Language Category	Councillor Pete Roberts	Emma Palmer	Cabinet	
	08/11/22	Shared Prosperity Fund	Councillor David Selby	Diane Reynolds	Cabinet	
	08/11/22	Corporate Safeguarding Board Update		Nina Davies	Cabinet	
	22/11/22	Council Tax Base	Councillor David Thomas	Jane Thomas	Cabinet	
	22/11/22	Trauma Informed Approach - Children's Services	Councillor Sandra Davies	Sharon Powell	Cabinet	
	22/11/22	Tourism Visitor Levy	Councillor David Selby	Diane Reynolds	Cabinet	
	22/11/22	Commercial Waste and Recycling Prices	Councillor Jackie Charlton	Matt Perry	Cabinet	
	13/12/22	Quarter 2 Strategic Risk Register	Councillor David Thomas	Jane Thomas	Cabinet	Health & Care Scrutiny; Learning & Skills Scrutiny; ECR Scrutiny December
	13/12/22	Quarter 2 Treasury Management Report	Councillor David Thomas	Jane Thomas	Cabinet	
	13/12/22	Quarter 2 Performance Report	Councillor James Gibson-watt	Emma Palmer	Cabinet	Health & Care Scrutiny; Learning & Skills Scrutiny; ECR Scrutiny December
	13/12/22	HRA Business Plan 2023-24	Councillor Matthew Dorrance	Nina Davies	Cabinet	
	13/12/22	Rent Setting	Councillor Matthew Dorrance	Nina Davies	Cabinet	
	13/12/22	Winter Routes	Councillor Jackie Charlton	Matt Perry	Cabinet	
	13/12/22	Corporate Safeguarding Policy	Councillor Sian Cox	Nina Davies	Cabinet	
	17/01/23	Brynlywarch Final Business Case	Councillor Pete Roberts	Emma Palmer	Cabinet	

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