

**POWYS**  
**LOCAL DEVELOPMENT PLAN**  
**2011-2026**

**Review Report**  
**~~Consultation Draft~~**

**~~January~~ February 2022**



## CONTENTS

|   |           |
|---|-----------|
| <b>EXECUTIVE SUMMARY</b> .....                                    | <b>5</b>  |
| <b>1. INTRODUCTION</b> .....                                      | <b>7</b>  |
| <b>2. THE REVIEW REPORT</b> .....                                 | <b>8</b>  |
| 2.1 THE LDP REVIEW PROCESS.....                                   | 8         |
| 2.2 STRUCTURE AND CONTENT OF THE REVIEW REPORT .....              | 8         |
| <b>3. LDP ANNUAL MONITORING REPORT KEY FINDINGS</b> .....         | <b>10</b> |
| 3.1 OVERVIEW .....  | 10        |
| 3.2 STRATEGY / POLICY ISSUES .....                                | 11        |
| 3.3 FURTHER INVESTIGATION / RESEARCH .....                        | 12        |
| 3.4 CONTEXTUAL INDICATORS .....                                   | 13        |
| <b>4. SUSTAINABILITY APPRAISAL (SA) MONITORING FINDINGS</b> ..... | <b>14</b> |
| 4.1 BIODIVERSITY.....   | 14        |
| 4.2 POPULATION .....  | 14        |
| 4.3 SOIL.....   | 14        |
| 4.4 STRATEGIC RESOURCES AND ASSETS .....                          | 15        |
| 4.5 CULTURAL HERITAGE.....  | 15        |
| 4.6 GEODIVERSITY.....   | 15        |
| <b>5. CONTEXTUAL CHANGES</b> .....                                | <b>16</b> |
| 5.1 NATIONAL CONTEXT.....   | 16        |
| 5.2 REGIONAL CONTEXT .....  | 23        |
| 5.3 LOCAL CONTEXT .....   | 24        |
| <b>6. EVIDENCE BASE CHANGES</b> .....                             | <b>27</b> |
| 6.1 LDP EVIDENCE BASE REQUIREMENTS .....                          | 27        |
| 6.2 POPULATION AND HOUSEHOLD PROJECTIONS .....                    | 29        |
| <b>7. LDP ISSUES, VISION, OBJECTIVES AND STRATEGY</b> .....       | <b>34</b> |
| 7.1 KEY ISSUES AND CONSIDERATIONS, VISION AND OBJECTIVES. ....    | 34        |
| 7.2 THE LDP STRATEGY .....  | 36        |
| <b>8. LDP TOPIC AREA REVIEW</b> .....                             | <b>41</b> |
| 8.1 HOUSING .....   | 41        |
| 8.2 ECONOMIC DEVELOPMENT.....                                     | 43        |
| 8.3 TRANSPORT.....  | 45        |
| 8.4 PLANNING FOR RETAILING AND TOWN CENTRES .....                 | 46        |
| 8.5 PLANNING FOR TOURISM .....                                    | 47        |
| 8.6 WASTE.....  | 48        |
| 8.7 SUSTAINABLE ENERGY .....                                      | 48        |
| 8.8 MINERALS.....   | 51        |

|            |  |           |
|------------|--|-----------|
| 8.9        | COMMUNITY AND INDOOR RECREATION FACILITIES .....                                       | 52        |
| 8.10       | MILITARY OPERATIONS.....   | 52        |
| 8.11       | ENVIRONMENTAL PROTECTION.....  | 52        |
| 8.12       | PLANNING OBLIGATIONS.....  | 55        |
| 8.13       | WELSH LANGUAGE .....   | 55        |
| 8.14       | SUPPLEMENTARY PLANNING GUIDANCE (SPG) .....  | 56        |
| 8.15       | PROPOSALS MAP AND CONSTRAINTS MAP .....  | 56        |
| <b>9.</b>  | <b>RE-CONSIDERATION OF THE SA, SEA AND HRA .....</b>                                   | <b>57</b> |
| 9.1        | SUSTAINABILITY APPRAISAL (SA) INCLUDING STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) ..... | 57        |
| 9.2        | HABITATS REGULATIONS ASSESSMENT (HRA).....   | 57        |
| <b>10.</b> | <b>OPPORTUNITIES FOR COLLABORATIVE WORKING .....</b>                                   | <b>59</b> |
| 10.1       | JOINT LDPs.....  | 59        |
| 10.2       | COLLABORATIVE WORKING .....  | 60        |
| 10.3       | STRATEGIC DEVELOPMENT PLAN .....   | 61        |
| <b>11.</b> | <b>CONCLUSIONS.....</b>  | <b>64</b> |
|            | <b>APPENDIX A SUMMARY TABLE OF SA MONITORING FINDINGS .....</b>                        | <b>66</b> |
|            | <b>APPENDIX B SUMMARY TABLES OF THE LDP POLICY REVIEW .....</b>                        | <b>76</b> |
|            | <b>APPENDIX C SUMMARY TABLES ON STATUS OF LDP PROPOSALS .....</b>                      | <b>81</b> |
|            | <b>ABBREVIATIONS.....</b>  | <b>88</b> |

## TABLES

|           |  |    |
|-----------|--|----|
| TABLE 1.  | SUMMARY OF ACTIONS FROM THE 62 INDICATORS MONITORING INCLUDED WITHIN THE AMR DURING THE MONITORING PERIOD..... | 10 |
| TABLE 2.  | NEW EVIDENCE BASE REQUIREMENTS .....   | 27 |
| TABLE 3.  | UPDATED EVIDENCE BASE REQUIREMENTS .....   | 28 |
| TABLE 4.  | SUMMARY OF THE CHANGES TO HOUSEHOLD PROJECTIONS FOR POWYS* .....   | 30 |
| TABLE 5.  | LOCAL AUTHORITY HOUSEHOLD PROJECTIONS AS PUBLISHED 2020/2021 (2018 BASED) - THE SIX ALTERNATIVES* .....        | 32 |
| TABLE 6.  | SPATIAL DISTRIBUTION OF HOUSING GROWTH PERMITTED AND DELIVERED .....   | 39 |
| TABLE 7.  | SPATIAL DISTRIBUTION OF EMPLOYMENT GROWTH PERMITTED .....  | 40 |
| TABLE 8.  | LDP POSITION OF ADJOINING LPAS .....   | 63 |
| TABLE 9.  | SA MONITORING FINDINGS – BIODIVERSITY .....  | 66 |
| TABLE 10. | SA MONITORING FINDINGS – POPULATION AND HUMAN HEALTH.....  | 67 |
| TABLE 11. | SA MONITORING FINDINGS – SOIL .....  | 68 |
| TABLE 12. | SA MONITORING FINDINGS – WATER.....  | 69 |
| TABLE 13. | SA MONITORING FINDINGS – AIR .....   | 70 |

|  |    |
|--|----|
| TABLE 14. SA MONITORING FINDINGS – CLIMATIC FACTORS .....  | 70 |
| TABLE 15. SA MONITORING FINDINGS – STRATEGIC RESOURCES AND ASSETS.....   | 71 |
| TABLE 16. SA MONITORING FINDINGS – CULTURAL HERITAGE .....   | 72 |
| TABLE 17. SA MONITORING FINDINGS – LANDSCAPE .....   | 74 |
| TABLE 18. SA MONITORING FINDINGS – GEODIVERSITY .....  | 74 |
| TABLE 19. STRATEGIC POLICIES.....  | 76 |
| TABLE 20. DEVELOPMENT MANAGEMENT POLICIES.....   | 76 |
| TABLE 21. TOPIC BASED POLICIES .....   | 77 |
| TABLE 22. POLICY H2 - A) STATUS AT 1 APRIL 2021 OF HOUSING ALLOCATIONS (HA) AND MIXED-USE ALLOCATIONS (MUA) .....              | 81 |
| TABLE 23. POLICY H2 B) - STATUS AT 1 APRIL 2021 OF HOUSING COMMITMENTS (HC).....   | 84 |
| TABLE 23. POLICY H11 - STATUS AT 1 APRIL 2021 OF GYPSY AND TRAVELLER SITE ALLOCATIONS .....                                    | 86 |
| TABLE 24. POLICY E1 AND E3 - STATUS AT NOVEMBER 2021 OF EMPLOYMENT ALLOCATIONS AND COMMITMENTS AND MIXED USE ALLOCATIONS ..... | 86 |
| TABLE 25. POLICY R2 - STATUS AT 1 APRIL 2021 OF RETAIL ALLOCATION .....  | 87 |

## FIGURES

|   |    |
|---|----|
| FIGURE 1. COMPARISON OF WELSH GOVERNMENT’S 2011, 2014 AND 2018 BASED POPULATION PROJECTIONS AND MID YEAR ESTIMATES FOR THE COUNTY OF POWYS .....                    | 31 |
| FIGURE 2. COMPARISON OF WELSH GOVERNMENT’S 2011, 2014 AND 2018 BASED HOUSEHOLD PROJECTIONS (PRINCIPAL PROJECTION) AND MID YEAR ESTIMATES FOR THE COUNTY OF POWYS... | 31 |
| FIGURE 3. NUMBER OF ACTUAL ADDITIONAL HOMES COMPLETED AGAINST ANNUAL AVERAGE REQUIREMENT .....  | 37 |
| FIGURE 4. NUMBER OF CUMULATIVE ADDITIONAL HOMES COMPLETED AGAINST THE CUMULATIVE ANNUAL AVERAGE REQUIREMENT .....   | 37 |
| FIGURE 5. NUMBER OF CUMULATIVE ADDITIONAL AFFORDABLE HOMES COMPLETED AGAINST THE CUMULATIVE AFFORDABLE ADDITIONAL DWELLINGS TARGET .....                            | 38 |
| FIGURE 6. STRATEGIC DIAGRAM FOR THE MID WALES REGION (FUTURE WALES).....  | 62 |

## Executive Summary

This document has been prepared as part of the review of the adopted Powys Local Development Plan (LDP) (2011-2026) ~~and has been drafted to enable public consultation on the findings and conclusions of the LDP's review.~~

The review of the LDP was triggered due to statutory and other reasons, as set out within the conclusion and recommendations of the LDP's Annual Monitoring Report 2021. On this basis, the Council's Cabinet resolved to commence review of the LDP in September 2021.

The purpose of the review process is to ensure that the LDP and its supporting evidence base is kept up to date to provide a sound and effective basis for making planning decisions. The Local Planning Authority's (LPA) review has been informed by the findings of monitoring undertaken since LDP adoption and changes to the national, regional and local planning policy context. It has also been informed by internal Officer engagement and Officer-Member discussion as part of the Council's internal LDP Working Group.

The review ~~will~~ **has** also been ~~en~~ informed by public consultation, ~~which took place between 6<sup>th</sup> January 2022 and 1<sup>st</sup> February 2022, on a Consultation Draft of the Review Report when the Council sought views on the findings and conclusions of the review and on other issues that should be considered in the review.~~ **The Council is seeking views on the findings and conclusions set out in this draft Review Report and on what other issues should be considered in the review.** It is not possible to consider changes that may be made to the LDP in detail at this stage, as this detail will be considered as part of preparing the Replacement LDP.

This ~~draft~~ Review Report presents the findings and conclusions of the LPA's review. It sets out where the LDP is delivering and performing well, as well as identifying areas that are not being implemented or delivered as intended. It also identifies areas of the LDP that need to be updated to reflect changes to national planning policy and guidance, along with other relevant strategies and evidence.

The key findings of the LPA's review are summarised as follows:

- the LDP's Key Issues and Considerations, Vision and Objectives will need to be reconsidered to incorporate well-being objectives, placemaking and National Sustainable Placemaking Outcomes.
- the LDP's Growth Strategy will need to be reconsidered in order to address issues with housing delivery and to reflect evidence around the future need of the plan area. The distribution of that growth across the LDP area, through the Spatial Strategy, will, therefore, also need to be reconsidered.
- changes will be needed to the detailed policies and proposals of the LDP to reflect the re-consideration of the strategy and to reflect updated national planning policy and guidance, and relevant evidence.
- the LDP's evidence base will need to be updated in line with the latest requirements of national planning policy and guidance.
- the LDP's Sustainability Appraisal, including Strategic Environmental Assessment, and Habitat Regulations Assessment, together with other impact assessments, will need to be reviewed, with consideration given to an Integrated Sustainability Appraisal.
- the LPA will need to work collaboratively with other LPAs within the Mid Wales region and in support of the Strategic Development Plan process.

This ~~draft~~ Review Report concludes that the LDP will need to be revised through a Full Revision, rather than a Short Form Revision. A Full Revision is required in order to enable the strategic issues identified to be addressed and to respond to significant changes in the planning policy context, including publication of Future Wales: The National Plan 2040, Planning Policy Wales (PPW) (11<sup>th</sup> Edition) and the Covid-19 pandemic. This ~~would~~ ~~means~~ that a Replacement LDP ~~would~~ ~~will need to~~ be prepared for the period 2022-2037.

## 1. Introduction

1.1 The current Powys Local Development Plan (LDP) (2011-2026) was adopted by the Council on the 17<sup>th</sup> April 2018. The adopted Powys LDP sets out the Council's policies for the development and use of land in Powys up to 2026 and is applicable to all of Powys except the area within the Brecon Beacons National Park, which has its own Planning Authority.

1.2 National legislation requires LDPs to be reviewed at least every four years from the date of adoption to ensure that LDPs and their supporting evidence base are kept up to date to provide a sound and effective basis for making planning decisions. This statutory requirement means the Powys Local Planning Authority (LPA) must commence review of the Powys LDP, adopted in April 2018, by April 2022.

1.3 The LPA is also required to consider whether to carry out a review of the adopted Powys LDP following publication of Future Wales - the National Plan 2040, in February 2021. This is the highest tier of development plan in Wales. Any lower-tier Strategic Development Plans and Local Development Plans, which are subsequently prepared, are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively.

1.4 The decision to review the LDP has also been influenced by the fact that the current Powys LDP is due to expire on the 31<sup>st</sup> March 2026 (the "end date"), after this date it will cease to be the development plan for the area. Work will need to commence on the Replacement LDP in July 2022 in order to allow time to prepare and adopt a Replacement LDP by the end date of the current LDP.

1.5 Evidence provided within the LDP's Annual Monitoring Report (AMR) 2021 identified that the number of housing completions was lower than anticipated, which meant that the LDP's housing-led strategy was not being delivered as intended. Certain LDP policies and proposals were also not being implemented as intended and required review.

1.6 The above requirements and factors led to the need to trigger review of the adopted Powys LDP. On this basis, and as recommended by AMR 2021, the Council's Cabinet resolved to commence review of the LDP in September 2021.

1.7 This Review Report sets out the findings and conclusions of the LPA's review of the adopted Powys LDP. It sets out where the LDP is delivering and performing well, as well as identifying areas that are not being implemented or delivered as intended. It also identifies areas that need to be updated to reflect changes to national planning policy and guidance, along with other relevant strategies and evidence.

1.8 The following section (**Section 2**) of this report explains the LDP review process and the structure and content of this report.

## 2. The Review Report

### 2.1 The LDP Review process

2.1.1 The LDP's Annual Monitoring Report (AMR) 2021, published in October 2021, alongside background papers with previous monitoring results, is a key part of the evidence that informs the review of the adopted Powys LDP. The LPA's review has also been informed by internal Officer engagement relating to various LDP topic areas and Officer-Member discussion as part of the Council's internal LDP Working Group.

2.1.2 The LPA's review ~~will be~~ ~~has been~~ further informed by public consultation ~~on a Consultation Draft of the Review Report, which took place between 6<sup>th</sup> January 2022 and 1<sup>st</sup> February 2022, when the Council sought views on the findings and conclusions of the review and on other issues that should be considered in the review.~~ This Review Report Consultation Draft has been prepared in order to seek views from consultation bodies and the public on the review of the adopted Powys LDP. ~~The Council is seeking views on the findings and conclusions set out in this draft Review Report and on what other issues should be considered in the review.~~ It is not possible to consider changes that may be made to the LDP in detail at this stage, as this detail will be considered as part of preparing the Replacement LDP.

2.1.3 The comments received in response to the public consultation ~~will be~~ ~~are~~ summarised in ~~Appendix D the Review Report~~, along with any changes needed ~~to the Review Report~~ in response to issues raised. ~~It will also explain how responses have influenced the conclusion on the way forward with the Replacement LDP.~~ The LPA received detailed comments relating to various parts of the Review Report. ~~Where appropriate, the LPA has made amendments to the Review Report to reflect additional considerations raised through public consultation and for clarification purposes.~~

2.1.4 The LPA's review is required to conclude on which revision procedure is to be followed for the LDP, either a Full Revision (Replacement LDP) or a Short Form Revision. ~~Based on the evidence within the Annual Monitoring Report 2021, it is likely that the Powys LDP will need to undergo the Full Revision process for a Replacement LDP rather than a Short Form Revision.~~ However, the conclusion on the procedure to be used to review the LDP will be informed by public consultation.

2.1.5 The Review Report ~~will set~~ ~~s~~ out the findings and conclusions of the LPA's review of the adopted Powys LDP (2011-2026) ~~and has been considered by the Council's LDP Working Group.~~ The Review Report will be presented to the Council's Cabinet for approval, before it is published and submitted to the Welsh Government (this sentence tbc). The Review Report ~~will~~ ~~form~~ ~~s~~ an important part of the evidence base for the Replacement LDP.

### 2.2 Structure and Content of the Review Report

2.2.1 The Review Report is structured in a way that addresses the requirements of national guidance within the Development Plan Manual Edition 3 (DPM3). The report sets out:

- the information that has informed the review (**sections 3 to 6**)
- detailed consideration of the impact of these findings on the LDP (**sections 7 and 8**).
- the approach to be taken towards revision of the LDP (**sections 9 to 11**)



**Section 3** summarises the key findings of the LDP’s Annual Monitoring Report 2021.

**Section 4** summarises the results of the LDP’s Sustainability Appraisal (SA) monitoring, undertaken as part of the Annual Monitoring Report (2021) (see also **Appendix A**).

**Section 5** summarises the main contextual changes since the LDP was adopted.

**Section 6** summarises the changes identified to the LDP’s evidence base requirements, identifying the need for new and updated evidence, and sets out changes to the evidence around population and household projections.

**Section 7** sets out how these findings impact on the current LDP’s vision, aims and objectives, including implementation of the LDP strategy.

**Section 8** provides a detailed review of each LDP topic area, identifying what needs to change and which parts of the evidence base require updating to support the changes. It also considers the implications for those parts of the LDP not proposed to be amended in terms of coherence and effectiveness of the plan as a whole. This section is accompanied by a summary of the review of each LDP policy in **Appendix B** and a summary of the status of all LDP proposals (allocations and commitments) in **Appendix C**.

**Section 9** sets out the proposed re-consideration of the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) to assess the impacts of the Replacement LDP, with consideration given to undertaking an Integrated Sustainability Appraisal.

**Section 10** explores and explains the opportunities to prepare Joint LDPs with neighbouring LPAs, and to work collaboratively on approaches and evidence, including in preparation for regional Strategic Development Plans (SDP).

**Section 11** sets out conclusions based on the review process ~~undertaken to date by the LPA~~ and explains whether a Full Revision (Replacement LDP) or a Short Form Revision of the LDP is anticipated and the reasons for this. ~~The final conclusions of the LDP review will, however, be informed by public consultation.~~

A list of **Abbreviations** used within the document is provided at the end of the report for reference.

### 3. LDP Annual Monitoring Report Key Findings

#### 3.1 Overview

3.1.1 The Development Plans Manual Edition 3 (March 2020) states that it is essential the conclusions in the Review Report can be strongly justified and evidenced in line with the findings of Annual Monitoring Reports (AMR) and other supporting evidence. The most recent AMR (AMR 2021) for the Powys LDP was published in October 2021 and covers the period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021. Two background papers were published alongside AMR 2021, AMR 2020 covering the period 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020 and a Monitoring Review covering the period from LDP Adoption (17<sup>th</sup> April 2018) to 31<sup>st</sup> March 2019.

3.1.2 AMRs provide 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 also 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.

3.1.3 The LDP monitoring framework, on which AMRs are based, 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. Each indicator has a specified target along with a 'trigger' which identifies the point or level at which any deviation will trigger the need for further action to be considered and/or taken.

3.1.4 A summary of the outcomes of the monitoring indicators detailed in AMR 2021 is provided in **Table 1**.

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

|  |   |
|--|---|
| <b>Continue Monitoring</b>                             | 28 - Continue Monitoring<br>7 - Adopted SPG by the Target date<br>2 – SPG Adopted just after the end of the monitoring period.                                      |
| <b>Training Required</b>                               | 3   |
| <b>Supplementary Planning Guidance (SPG) Required</b>  | 0   |
| <b>Further Investigation/Research Required</b>         | 8   |
| <b>Policy Review Required</b>                          | 3   |
| <b>Plan Review</b>                                     | 4   |
| <b>Not Applicable to this AMR period or superseded</b> | 7 – Includes indicators that need two consecutive years of data before action required. Indicators unable to be monitored and indicators that have been superseded. |

3.1.5 In AMR 2021 the majority (35) of indicators demonstrated positive policy implementation. However, there were some indicator targets that were not being achieved (18) and thus trigger points were reached. This shows 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. **Appendix A** contains a table outlining the reasons for potentially proposing changes to individual local policies on the basis of policy performance.

## 3.2 Strategy / Policy Issues

3.2.1 There were seven monitoring indicators that required strategy / policy issues to be addressed as part of the LDP review process, these can be grouped into the following categories:

### Growth Strategy / Housing Completions

3.2.2 AMR 2021 (monitoring indicator AMR2b) determined that the cumulative number of net additional dwellings delivered (2,101 dwellings), between 31<sup>st</sup> March 2021 and the start of the Plan period (1<sup>st</sup> April 2011), was below what was anticipated in the monitoring target (2,659 dwellings) giving a shortfall of 558 dwellings at the end of March 2021.

3.2.3 The shortfall in additional dwellings delivered, means that a further 2,399 dwellings need to be completed over the remaining five years of the plan period (1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2026) for the dwelling requirement figure to be met. This would require an average completion rate of 480 additional homes a year, which based on past completion rates (monitoring indicator AMR2) is considered to be unrealistic and means the target of 4,500 new homes is unlikely to be met.

3.2.4 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.

### Allocated Housing Sites

3.2.5 There are 80 sites allocated for housing in the LDP, of which 53 (66%) did not have any form of planning permission (monitoring indicator AMR4) at the end of March 2021.

3.2.6 The cumulative total of the annual completion target of additional dwellings to be delivered on allocated sites, between the date of LDP adoption (17<sup>th</sup> April 2018) and the end of the monitoring period for AMR 2021 (31<sup>st</sup> March 2021) equated to 845 dwellings. The actual number of dwellings delivered on allocated housing sites over this three-year period was only 88 dwellings, meeting only 10% of the target (monitoring indicator AMR5).

3.2.7 It is recognised that LDP allocations need time to accrue traction as they only gain certainty once the Plan is adopted. The LPA acknowledges that it takes time to obtain developer interest, negotiate or complete on a site sale, and then gain planning permission. However, the trajectory included in AMR 2021 monitoring indicator AMR2a, demonstrates that allocated sites are fundamental towards the delivery of additional dwellings to meet the dwelling requirement and implementing the LDP Growth Strategy.

3.2.8 It is worth noting that over the three-year period the number of housing units delivered on windfall sites has been in excess of the windfall target demonstrating that housing proposals are deliverable and viable.

### **Retail – Development within Town Centre Areas**

3.2.9 The monitoring framework includes monitoring indicator AMR36 to test LDP Policy R3 which states that proposals for new development will be permitted where they would not result in less than: 75% of units within a Primary Shopping Frontage and 66% of units within Secondary Shopping Frontage being used for A1 and A3 use class orders, unless they comply with the criteria listed within the policy.

3.2.10 The findings in AMR 2021 found that there are Primary Shopping Frontages that have less than the policy specific target percentage of at least 75% of units being in the A1 and A3 use class orders. The findings mean that part of LDP Policy R3 has potentially become ineffective and should therefore be revised as part of the LDP review.

### **Public Open Space**

3.2.11 Monitoring indicators AMR55 and AMR56 test the implementation of LDP Policy DM3 which serves to protect areas identified as open space in the Open Space Assessment or by typologies listed in the Open Space Assessment and TAN 16 and to secure the provision of new open spaces on residential developments of ten or more dwellings.

3.2.12 With regards to the provision of new public open spaces the findings from AMR 2021 (monitoring indicator AMR55) found that provision is not being sought as required through LDP Policy DM3 and the Planning Obligations SPG. The two previous monitoring periods recommended an action of continue monitoring, however there have consistently been instances where public open space is not being sought which has been amplified in the findings in AMR 2021. This has raised questions about the effectiveness and appropriateness of LDP Policy DM3 which will need to be addressed in detail as part of the review.

3.2.13 Monitoring indicator (AMR 56) looks at the amount (hectares) of open space lost and gained as a result of planning applications granted. During the monitoring period for AMR 2021, two planning applications were granted without consideration of LDP Policy DM3, resulting in a potential loss of open space. These findings continued the trend seen in the Monitoring Review where a total loss of 4.04 hectares of public open space was recorded. AMR 2021 recommends a review of LDP Policy DM3, to take the opportunity through the review of the LDP to make the policy clearer and for it to be easier for public open spaces to be identified.

## **3.3 Further investigation / research**

### **Topics Identified where Further Investigation or Research is Required**

3.3.1 AMR 2021 identified eight topics where further investigation or research is required. The results from this will inform the Replacement LDP and may lead to the reconsideration of further LDP policies, this includes the following topic areas:

- Affordable Housing
- Viability
- Housing Density
- Tourism Developments
- Minerals Safeguarding
- Local Search Areas
- Community and District Heating Networks

### **3.4 Contextual indicators**

3.4.1 Arising from the publication of DPM3, AMR 2021 also began to monitor contextual economic and social indicators that may influence the performance of the LDP or reflect the implementation of the LDP strategy. It should be noted that contextual environmental indicators are monitored separately as part of the SA monitoring.

3.4.2 The initial results of the monitoring of contextual indicators identified:

- levels of unemployment in Powys had begun to rise in 2019-2020.
- the number of homelessness cases in Powys had increased from 527 in 2019-2020 to 621 in 2020-2021.
- house prices in Powys had increased by 12.3% between March 2020 and March 2021, whereas average wages had not increased to the same extent.

3.4.3 These results are likely to reflect wider factors, including the impact of the Covid-19 pandemic, however they highlight the need for the LDP to support economic recovery and to address housing needs. These contextual indicators will continue to be monitored in future AMRs, which will help to identify any emerging trends that will need to be taken into account in the Replacement LDP.

## 4. Sustainability Appraisal (SA) Monitoring Findings

4.0.1 The LDP's Monitoring Framework includes the monitoring of the significant effects of implementing the LDP, as required under the Strategic Environmental Assessment (SEA) Regulations. The SEA monitoring framework for the LDP includes 34 indicators, which are used to test the sustainability performance of the Plan. The results of this monitoring are detailed within the Annual Monitoring Report (AMR) 2021 and background papers, and are summarised in **Appendix A** of this Review Report.

4.0.2 The main impacts and trends identified in relation to the SEA monitoring are set out below.

### 4.1 Biodiversity

4.1.1 The results of the monitoring for the SEA biodiversity topic area identified a potential negative impact on designated sites due to the deterioration in the condition of one of the conservation features of the Berwyn and South Clwyd Mountains Special Area of Conservation (SAC). This was identified early on within the first few months of the adopted Powys LDP and therefore is unlikely to have been impacted on by the LDP. NRW have recently published the results of the protected sites baseline assessment 2020, which will enable changes in condition to be identified and analysed within the next SEA monitoring period.

### 4.2 Population

4.2.1 The results of the monitoring in respect of the SEA population and demographic profile subtopic area show a continuation in the trend towards an ageing population in Powys. However, the results also show signs of a reversal, to some degree, in the trend for outmigration of younger adults (20 to 34-year-olds), with a net inflow of adults within this age category. This suggests that Powys may be starting to retain or attract more young people of working age. The housing and employment provision made by the LDP may be having some influence over locational decisions. The Replacement LDP will need to respond to the changing housing, employment and community needs of both the young and ageing population.

### 4.3 Soil

4.3.1 The results of this monitoring indicate that the need to protect soils classified as important for carbon storage is not always being considered, as indicated by a case where development had been permitted on a mapped area of thick peat. This has been addressed by reviewing accessibility to mapping and training. The results in respect of contaminated land and verification reports suggest that remediation is being supported as part of new development, in line with the SEA objective.

## 4.4 Strategic Resources and Assets

4.4.1 The results of the monitoring in relation to safeguarded mineral resource sites indicate inconsistencies in the way that LDP Policy DM8 is being used in making planning decisions. This suggests that the SEA objective to protect mineral resources from development that would preclude future extraction is not being met as a result of issues with policy implementation. Further investigation, research or training is proposed, and the policy will be reconsidered as part of the Replacement LDP process.

## 4.5 Cultural Heritage

4.5.1 The results of the monitoring in relation to Welsh language indicate that the percentage of the population of Powys who can speak Welsh had initially continued the upward trend following adoption of the LDP, however thereafter the percentage fell in 2020 and continued to fall in 2021. Whilst this may indicate a negative trend, these figures are based on the Welsh Government's Annual Population Survey estimates and are only intended for interim use until data from the UK National Census 2021 becomes available. The Census data will provide a key source of evidence to inform the Replacement LDP and associated SA process.

## 4.6 Geodiversity

4.6.1 The results of the monitoring indicate that the Regionally Important Geodiversity Sites (RIGS) and Geological Conservation Review (GCR) sites have not been consistently identified or considered in the determination of planning applications. This has led to occasions where the impact of development on these designations has not been assessed, which suggests that the SEA objective to protect RIGS from incompatible development may not have been met. This has been addressed by reviewing the accessibility of the mapped data and officer training.

## 5. Contextual Changes

5.0.1 Since the LDP was adopted in April 2018, the planning policy context at a national, regional and local level has changed. New or updated planning legislation, policy, guidance and strategies have been released, including in other policy areas relevant to planning. This section focuses on identifying the most significant contextual changes that will need to be taken into account in reviewing the LDP. Details of these changes and other relevant contextual changes can be found within the published AMR 2021 and AMR 2020 (background paper).

### 5.1 National Context

#### Planning (Wales) Act 2015

5.1.1 The Act sets out a series of legislative changes to deliver reform of the planning system in Wales to ensure it is fair, resilient and enables development. A key objective of the Act is to strengthen the plan-led approach by introducing a legal basis for the preparation of a National Development Framework (published as Future Wales in February 2021) and regional Strategic Development Plans (SDP). It also confirmed the statutory purpose of the planning system in Wales in stating that any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Well-being of Future Generations (Wales) Act 2015. The adopted Powys LDP was not required to demonstrate compliance with this duty as it had been submitted for examination prior to 1<sup>st</sup> April 2016, however the Replacement LDP will be required to demonstrate compliance with this duty.

#### The Local Government and Elections (Wales) Act 2021 (January 2021)

5.1.2 This Act replaces Strategic Planning Panels (SPP) the governance body set out in the Planning (Wales) Act 2015 to prepare a SDP with four mandatory Corporate Joint Committees (CJCs) covering each region - South East Wales, South West Wales, Mid Wales and North Wales. Each CJC has a statutory duty to prepare an SDP. The Powys Local Planning Authority (LPA) is included in the Mid Wales Region, meaning the CJC and subsequent SDP will cover Powys, Ceredigion and the area of the Brecon Beacons National Park that sits within the Powys Unitary Authority boundary. CJCs also have functions relating to economic well-being and development of transport policies.

#### Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021

5.1.3 The Town and Country Planning (Strategic Development Plan) (Wales) Regulations (SI 2021/360) were made on 18<sup>th</sup> March 2021 and will come into force on 28<sup>th</sup> February 2022. The Regulations set out the procedure for the preparation of SDPs following on from The Local Government and Elections (Wales) Act 2021 (January 2021).



### **Socio-economic Duty (March 2021)**

5.1.4 The Socio-economic Duty within the Equality Act 2010 came into force in Wales on 31<sup>st</sup> March 2021 and is aimed at encouraging better decision making and reducing inequalities resulting from socio-economic disadvantage. The duty requires relevant public bodies when taking strategic decisions, for example associated with strategic policy development and development plans, to have due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage. The LPA will integrate the duty into the Impact Assessment process associated with the LDP, within its approach towards engagement and involvement and in its use of local evidence and data.

### **Public Health Wales Act (2017)**

5.1.5 This Act makes changes to the law in Wales to improve health and prevent avoidable health harms. It sets out provisions for making improvements to health including for the Welsh Ministers to publish a national strategy on tackling obesity and to make regulations about the carrying out of Health Impact Assessments (HIA) by public bodies. The Act defines a HIA as an assessment of the likely effect, both in the short term and in the long term, of a proposed action or decision on the physical and mental health of the people of Wales or of some of the people of Wales. Regulations are due to be published to specify when a HIA is required to be carried out by public bodies and how it should be undertaken. The LPA will have regard to any regulations and guidance in respect of HIA as part of the Impact Assessment process associated with the Replacement LDP.

### **Future Wales: The National Plan 2040 (February 2021)**

5.1.6 Future Wales – the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It replaces the former Wales Spatial Plan (2004, 2008). It is the highest tier of development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of Wales' communities. This framework will be built on by SDPs at a regional level and LDPs at local authority level. SDPs and LDPs are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively.

### **Planning Policy Wales, Edition 10 (December 2018) and Edition 11 (February 2021)**

5.1.7 Planning Policy Wales (PPW) has been updated twice since the Powys LDP was adopted. Edition 10 represented a complete re-working of national planning policy to take into account the Well-being of Future Generations (Wales) Act 2015, including the seven well-being goals and the five ways of working. It promoted the concept of placemaking within the planning system and set out the National Sustainable Placemaking Outcomes. The latest edition of PPW, Edition 11, published alongside Future Wales, involved revisions to align it with Future Wales and to take into account the socio-economic duty and the impacts of the Covid-19 pandemic. It also reflects policy changes to housing land supply (replaced by the LDP's housing trajectory, as presented in AMR 2021), affordable housing-led sites and development quality standards, local energy planning, transport and active travel.

### **Development Plans Manual, Edition 3 (March 2020)**

5.1.8 A new edition of the Development Plans Manual was published in March 2020 (DPM3), updated to take account of significant changes to planning legislation and national policy. The Manual is not national policy; however it provides guidance for practitioners involved in the preparation and implementation of development plans. It is intended to be read alongside PPW and other relevant legislation and guidance, and contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking. The Manual clarifies the expectations of Welsh Government with regards to the plan making process and will be used to guide the preparation of the future LDP.

### **Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (July 2020)**

5.1.9 This document sets out the planning policy priorities of the Welsh Government in the post Covid-19 recovery phases. The document outlines the need for good, high-quality developments which are guided by placemaking principles. It identifies the following eight key issues which bring individual policy areas together to ensure that action is the most effective:

- Staying local: creating neighbourhoods
- Active travel: exercise and rediscovered transport methods
- Revitalising our town centres
- Digital places - the lockdown lifeline
- Changing working practices: our future need for employment land
- Reawakening Wales' tourism and cultural sectors
- Green infrastructure, health and well-being and ecological resilience
- Improving air quality and soundscapes for better health and well-being

5.1.10 Each issue draws out important points within PPW and includes a commentary on specific aspects of the post potential Covid-19 pandemic situation. The Replacement LDP process will provide the opportunity for the LPA to respond to the priorities and issues identified nationally and to aid recovery at the local level.

### **Planning and the Post COVID-19 Recovery: Letter to Local Authorities (July 2020)**

5.1.11 This letter from the Welsh Minister states that local planning authorities must reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented. LDPs undergoing review, which had not yet been submitted to the Planning Inspectorate (now the Planning and Environment Decisions Wales - PEDW) for examination were required to undertake an assessment of the evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic. Robust conclusions would need to be reached on the need for new evidence and any consequential changes to strategy and policy before plan preparation progressed. The Replacement LDP process will enable the LPA to respond to the impact of the pandemic on all elements of the LDP, and as part of the supporting evidence and assessments.

### **Local Development Plan (LDP) end dates: Letter to Local Authorities (September 2020)**

5.1.12 This letter from the Welsh Minister explains the position regarding the end date of LDPs in response to concerns from a number of LPAs regarding their LDP end dates with the concern that implications for local decision-making. The letter clarifies that the provisions within the Planning (Wales) Act 2015 specifying the period to which a plan has effect did not commence until the 4<sup>th</sup> January 2016, and therefore they do not apply to LDPs adopted prior to this date. LDPs adopted prior to this date will remain the LDP for determining planning applications until replaced by a further LDP. Whereas, for LDPs adopted after this date, the LDP will cease to be the LDP on the expiry period specified in the plan. Thus, the Powys LDP will cease to be the adopted Powys LDP at the end of the period specified in the plan, which will be 31<sup>st</sup> March 2026.

### **Revocation of Technical Advice Note (TAN) 1 Joint Housing Land Availability Studies (March 2020) and Monitoring of Delivery through a Housing Trajectory**

5.1.13 The Welsh Government announced changes to the way in which housing delivery should be monitored. The changes to PPW removed the five-year housing land supply policy and replaced it with a policy statement making it explicit that the housing trajectory, as set out in the adopted Powys LDP, will be the basis for monitoring the delivery of development plan housing requirements as part of LDP Annual Monitoring Reports (AMR). It also involved the revocation of TAN 1: Joint Housing Land Availability Studies (January 2015) in its entirety, as a consequence of the policy change to PPW. The revised approach, based on the LDP trajectory, will ensure that the monitoring of housing delivery, including the response to under-delivery, is an integral part of the process of LDP preparation, monitoring and review.

### **Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites (June 2018)**

5.1.14 This Circular provides updated guidance on the planning aspects of identifying sustainable sites for Gypsies and Travellers and outlines how planning authorities and Gypsies and Travellers can work together to achieve this aim. The Circular outlines the duty to provide sites, the necessity of involving Gypsies and Travellers proactively in the process and the steps required to assess the need for sites, identify suitable sites, and include policies in development plans.

### **Revocation of Technical Advice Note (TAN) 8 Planning for Renewable Energy (February 2021)**

5.1.15 As a result of the publication of Future Wales, TAN 8 has been revoked, and therefore Strategic Search Areas for onshore wind energy development proposals no longer exist. Instead, Future Wales identifies pre-assessed areas for wind energy where the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. Policy 17 of Future Wales sets a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to detailed criteria contained within Future Wales Policy 18.

### **Net Zero Wales and All Wales Plan 2021-2025 (October 2021)**

5.1.16 Welsh Government has published its second emissions reduction plan for Carbon Budget (2021-2025) setting the foundations to make Wales net zero by 2050. Alongside this, 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)**

5.1.17 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. The Strategy 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

5.1.18 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)**

5.1.19 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 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 PPW 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.

### **Welsh National Marine Plan (Nov 2019)**

5.1.20 The Welsh National Marine Plan is intended to support the sustainable development of the seas around Wales, covering inshore and offshore areas for the next 20 years. It sets out the Welsh Government's ambitions for the future use of marine natural resources and

how various users of the seas should interact and consider each other's activities and future plans. The Marine and Coastal Access Act (2009) requires public authorities to take relevant authorisation or enforcement decisions in accordance with the Welsh National Marine Plan unless relevant considerations indicate otherwise. Public authorities are also required to have regard to the appropriate marine policy documents in making any decision which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area.

### **Technical Advice Note (TAN) 15: development, flooding and coastal erosion (made available September 2021)**

5.1.21 In September 2021, a new version of TAN 15 was made available by the Welsh Government in advance of the date that it was due to come into effect on the 1<sup>st</sup> December 2021. The new TAN, which will also replace TAN 14: Coastal Planning, will be accompanied by a new Flood Map for Planning, which will replace the development advice map. The new TAN introduces important changes to the way flood and coastal erosion risks are 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 new Flood Map for Planning, which includes flood risk zones showing future risk under a climate change scenario.

5.1.22 In November 2021, the Welsh Minister confirmed that the coming into force of the new TAN 15 and Flood Map for Planning would be suspended until 1<sup>st</sup> June 2023 in order to enable LPAs to consider fully the impact of the climate change projections on their respective areas. The Minister also requires every LPA to complete work to review, within the next 12 months, the Strategic Flood Consequences Assessments (SFCA) for their area, either individually or on a regional basis. The Minister has also set other requirements for local authorities, in partnership with other flood risk management authorities, in relation to flood risk management schemes and delivery of the SuDS Approval Body functions. The new TAN 15 and Flood Map for Planning will apply to the Powys Replacement LDP process. The reviewed SFCA will inform the LDP's strategy, policies and proposals.

**5.1.23 The Welsh Government issued two further letters in December 2021 and January 2022 in order to provide an update and further information and clarification on the position. The letter in December set out the package of work to be completed by local authorities before June 2023 and identifies the key implications for planning services, including those relating to SFCAs, development plans and development management. The letter in January sets out how the Welsh Government intends to respond to development management consultations where floodrisk is a material consideration, confirming that the Development Advice Map and Flood Map for Planning will be considered in the consultation process.**

### **Schedule 3 of the Flood and Water Management Act (2010) – Disposal of Surface Water through SuDs (January 2019)**

~~5.1.23~~ **5.1.24** Schedule 3 of the Flood and Water Management Act (FWMA) 2010 provides a framework for the approval and adoption of surface water systems serving new developments. The Welsh Government introduced five statutory instruments to implement this requirement. The statutory instruments made it a requirement from the 7<sup>th</sup> January 2019 for all new developments of more than one dwelling, or where the construction area is 100 square metres or more, to dispose of surface water through a sustainable drainage system (SuDS).

### **Welsh Government Circular 008/2018: Planning requirement in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants (July 2018)**

**5.1.24** **5.1.25** This Circular updated the information and guidance to be used by planning authorities when considering proposals for new development in areas with no public sewerage system, and replaced Welsh Office Circular 10/99. It provides guidance for both planning policy and development management. With regards to LDPs, the Circular states that planning authorities may wish to include appropriate policies in their development plans to reflect a) the contents of the Circular, b) its own knowledge and experience of the circumstances and conditions in various localities within its area; and c) the views of appropriate bodies on the issue of private sewerage and its likely effect on public health, amenity and the environment.

### **Essentials Guide: Sustainable Management of Natural Resources (June 2019)**

**5.1.26** The sustainable management of natural resources is about improving the social, economic, environmental and cultural well-being of Wales through taking an ecosystem approach to managing natural resources. This Guide, published by the Welsh Government, focuses on the role of public service delivery, including planners, and provides an introduction and summary to integration of The Well-being of Future Generations (Wales) Act 2015, The Environment (Wales) Act 2016 and the Planning (Wales) Act 2015, explaining how natural resources and resilient ecosystems underpin our well-being. The Guide refers to the national priorities for the sustainable management of natural resources - delivering nature-based solutions; increasing resource efficiency and renewable energy; and taking a place based approach.

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

**5.1.25** **5.1.27** The Environment (Wales) Act 2016 requires LPAs to have regard to the SoNaRR published by NRW, which provides an evidence base for LPAs when revising LDPs. This second report builds on the evidence base in the first SoNaRR in 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.

### **Securing Biodiversity Improvements (October 2019)**

**5.1.26** **5.1.28** This Chief Planning Officer letter draws the attention of LPAs to the Section 6 Duty of the Environment (Wales) Act 2016 and the need for planning authorities to 'seek to maintain and enhance biodiversity in the exercise of their functions. It goes on to state that 'planning authorities should be proactive and embed appropriate policies into local development plans to protect against biodiversity loss and secure enhancement'.

### **Intensive Poultry Units (June 2019)**

5.1.27 5.2.29 This Chief Planning Officer letter reminds LPAs of the need to fully consider the effects of intensive agricultural development when determining planning applications and invites LPAs to participate in future work on this area. It advises LPAs, where appropriate, to put in place appropriate policies in LDPs in order to facilitate the sustainable construction of this type of development. It also refers to the updated guidance for the assessment of potentially polluting emissions from intensive poultry units issued by Natural Resources Wales (NRW) for use by LPAs and their respective Environmental Health Departments on any relevant applications.

### **Llwybr Newydd - The Wales Transport Strategy (2021)**

5.1.28 5.1.30 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.

### **Active Travel Act Guidance (2021)**

5.1.29 5.1.30 This guidance, which replaces previous guidance on Active Travel, 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). 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 modes of transport. 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. This guidance explains that Active Travel Network Maps should be used to inform the preparation and review of LDPs and SDPs, with reference given to the requirement within PPW for these maps to inform site allocations.

## **5.2 Regional context**

### **Mid Wales Growth Deal**

5.2.1 Work is continuing on delivering a Growth Deal for the Mid Wales region and progress on the deal has been detailed in AMR 2020 and AMR 2021. In October 2021, the Portfolio Business Case (and supporting documents), approved by the Growing Mid Wales Board, were 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. **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.** The progress of the Mid Wales Growth Deal and associated work will be taken into account in preparing the Replacement LDP.

### **Mid Wales Area Statement, Natural Resources Wales (March 2020)**

5.2.3 The Environment (Wales) Act 2016 requires Local Planning Authorities to have regard to areas statements in the development of LDPs. The Powys LPA area is within the region covered by the Mid Wales Area Statement, which also includes the LPA areas for Ceredigion and the Brecon Beacons National Park. It sets out the following five themes for the Mid Wales area:

- Improving biodiversity – responding to the nature emergency.
- Sustainable land, water and air.
- Reconnecting people and places – improving health, well-being and the economy.
- Forest resources – managing timber resources effectively.
- Climate emergency – adaptation and mitigation.

5.2.4 Area statements are a key piece of evidence for LPAs to consider in preparing their LDPs. They provide evidence of environmental and natural resources issues and should be used as part of the evidence base for the LDP and when fulfilling the LPA's duty to maintain and enhance biodiversity in exercising its planning functions.

### **South Wales Regional Aggregates Working Party – Regional Technical Statement Second Review (December 2020)**

5.2.6 Powys County Council, as the Mineral Planning Authority for the County of Powys, excluding that area within the Brecon Beacons National Park endorsed the Regional Technical Statement (Aggregates) Second Review 2020 (RTS2). PPW requires that each Mineral Planning Authority prepares to meet local, regional and UK needs for the supply of minerals. For the purposes of commercial stability, the aggregates industry requires a proven and viable landbank.

5.2.7 RTS2 calculates that Powys has crushed rock reserves of 139.24 million tonnes which equates to a landbank of 39.6 years, which meets and exceeds the identified need for a 25-year landbank as specified by PPW and Minerals Technical Advice Note (MTAN) 1. The data demonstrated a surplus of crushed rock supply so there is no requirement for new allocations in the future. The Powys apportionment for land-won sand and gravel was identified as Nil in RTS2 so again there is currently no future requirement for sand and gravel aggregate allocations.

## **5.3 Local context**



### **Towards 2040, the Powys Well-being Plan (May 2018)**

5.3.1 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 Well-being Plan provides a long-term vision of well-being in Powys and details the actions that will be taken to address local issues and contribute to the national Well-being goals. It sets out four local well-being objectives:

- People in Powys will experience a stable and thriving economy.
- People in Powys will enjoy a sustainable and productive environment.
- People in Powys will be health, socially motivated and responsible.
- People in Powys will be connected by strong communities and a vibrant culture.

It also sets out 12 initial well-being steps to deliver these local objectives.

5.3.2 The Powys PSB Annual Reports highlight the work that the PSB has done to deliver the objectives in Towards 2040. 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 November 2021, a draft Assessment was published for consultation, which identifies 18 areas of focus that are intrinsic to well-being. The Assessment will be used to set the local well-being objectives, and these will provide a framework for the next Well-being Plan.

5.3.3 LPAs have a duty to have regard to the local Well-being Plan during development plan preparation and review, and it will form a key part of the LDP’s evidence base for the Replacement LDP.

### **Vision 2025: Our Corporate Improvement Plan (April 2018, refreshed April 2021)**

5.3.4 In April 2018, Vision 2025 was launched by Powys County Council as its Corporate Improvement Plan, which sets out a seven-year vision for the County and plans for how the Council would achieve it. Vision 2025 sets out four well-being objectives:

- Well-being Objective 1: We will develop a vibrant economy.
- Well-being Objective 2: We will lead the way in providing effective, integrated health and care in a rural environment.
- Well-being Objective 3: We will strengthen learning and skills.
- Well-being Objective 4: We will support our residents and communities.

5.3.5 Progress made by the Council in terms of meeting its wellbeing objectives is reported on an annual basis. Vision 2025 was refreshed in April 2021 as the Corporate Improvement Plan 2021-2025. The Council’s aspirations and objectives, as set out within this document, will be taken into account in preparing the Replacement LDP.

### **Climate Change Emergency**

5.3.6 In September 2020, Powys County Council declared a climate emergency. This included an ambition to reduce its carbon emissions to net zero, in line with the Welsh public sector target of 2030. The Council has been working to reduce carbon emissions by:

- As a partner on the Powys Public Service Board (PSB), the Council is contributing towards the preparation of a county wide Carbon Positive Strategy.
- Funding work in the community on climate change and supporting the local economy through the Arwain Leader Programme.
- Coordinating the preparation of a Mid Wales Energy Strategy on behalf of the Growing Mid Wales Partnership.
- Improving waste and recycling services.
- Installing EV Charging points in communities.
- Installing solar panels on schools and buildings.
- Constructing energy-efficient homes and schools.
- Providing new infrastructure to encourage cycling and walking and the use of public transport.

### **Water Quality in Riverine Special Areas of Conservation (SACs) (December 2020, January 2021)**

5.3.7 In 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 20<sup>th</sup> January 2021 following publication of the condition status report on the other riverine SACs in Wales including the Usk, Dee and Tywi, the catchments of which all impact upon the Powys LDP area. As a consequence, NRW issued Interim Planning Advice in December 2020 which required new development within SAC catchments to achieve phosphate neutrality or betterment.

5.3.8 In May 2021, NRW issued updated advice to planning authorities **(no longer 'interim' advice)** for planning applications affecting phosphorous sensitive river SACs, which includes advice for the review of LDPs. It provides advice in terms of screening proposed LDP policies, including those relating to private sewage treatment systems, and the assessment of allocations proposed to be connected to mains wastewater treatment works. This matter will be a significant consideration in the preparation of the Replacement LDP and associated assessment processes.

## 6. Evidence Base Changes

### 6.1 LDP Evidence Base Requirements

6.1.1 To inform the Replacement LDP, there will be a need to update various elements of the evidence base that informed the current LDP. This will involve updating existing assessments and carrying out new assessments in line with the latest requirements of national planning policy and guidance. This evidence will need to be considered alongside evidence gathered through the LDP’s annual monitoring process and wider contextual evidence, plans, strategies, and circumstances, including those noted in **Section 5**.

6.1.2 **Table 2** and **Table 3** below provide a list of new and updated evidence that will be required, along with a reason explaining why this evidence is needed to support the preparation of the Replacement LDP. This list focuses on evidence required to be undertaken by the Local Planning Authority (LPA) or in partnership with others, for instance the Local Housing Authority. It is not a definitive list, and additional or updated evidence requirements may emerge as the Replacement LDP progresses.

**Table 2. New Evidence Base Requirements**

| <b>New Evidence Required</b>          | <b>Reason</b>   |
|---------------------------------------|---|
| Settlement Assessment                 | To provide an assessment of the role, function, services, opportunities, constraints, capacity, aspirations and character of settlements, in order to inform the LDP’s strategy, policies, and proposals. |
| Employment Land Review (ELR)*         | To assess the anticipated employment change and land use together with estimates of land provision for employment, to inform the LDP’s strategy, policies, and proposals.                                 |
| Local Landscape Character Assessment  | To provide an assessment of the character, characteristics, features and sensitivities of local landscapes within the LDP area, to inform the LDP’s strategy, policies, and proposals.                    |
| Green Infrastructure Assessment (GIA) | To provide an inventory and map of existing green infrastructure, and ecological assets and networks, to inform the LDP’s strategy, policies, and proposals.  |
| Infrastructure Plan                   | To provide evidence of how infrastructure of the appropriate capacity, location, funding and timing, will be in place to support the implementation and delivery of the LDP.                              |

\* Evidence relating to employment land at a strategic level will be provided as part of the Mid Wales Regional Employment Study referred to in **Section 10**.

**Table 3. Updated Evidence Base Requirements**

| <b>Updated Evidence Required</b>                                     | <b>Reason</b>  |
|--|--|
| Local Housing Market Assessment (LHMA)*                              | To provide updated evidence of local housing need and demand to inform the LDP's housing strategy and requirements, and affordable housing policies.   |
| Gypsy and Traveller Accommodation Assessment (GTAA)*                 | To provide an updated assessment of the accommodation needs of Gypsy and Traveller families in order that the LDP can make provision to meet identified unmet need.  |
| High Level Viability Assessment                                      | To provide an updated assessment of housing development viability to support the LDP's strategy and to inform the LDP's policies, and proposals, including those relating to affordable housing and infrastructure.  |
| Retail Study   | To provide an updated assessment of retail need to identify any requirement for additional retail floorspace. Also, to review the retail hierarchy and Town Centre Areas and Primary/Secondary Shopping Frontage approaches, in order to inform the LDP's strategy, policies, and proposals. |
| Welsh Language Impact Assessment (WLIA)                              | To provide an updated assessment of the likely effects of the LDP on the use of the Welsh language in the plan area, as part of the LDP's Sustainability Appraisal, and to inform the LDP's strategy, policies, and proposals.   |
| Strategic Flood Consequences Assessment (SFCA) (Stage 1 and Stage 2) | To provide an updated assessment of flood risk by identifying areas of current and future flood risk, in order to inform LDP policies and the site selection process.  |
| Open Space Assessment (OSA)  | To provide an updated assessment of existing open space provision, to identify areas of open space to be protected and to provide a framework for the provision of new open spaces, in order to inform LDP policies and proposals.   |
| Renewable Energy Assessment (REA)                                    | To assess the potential for a range of renewable energy technologies below a threshold of 10MW installed capacity, in order to inform LDP policies and proposals.  |

\*The Local Housing Authority is responsible for undertaking these assessments; however they form an important part of the evidence base for LDPs.

6.1.3 The remainder of this section focuses on the latest Welsh Government population and household projections, released since adoption of the current LDP. PPW explains that these projections, alongside the latest LHMA and Local Well-being Plan, form a fundamental part of the evidence base for development plans.

## 6.2 Population and Household Projections

### Background

6.2.1 The housing requirement of the current LDP was based on the principal projection from the 2011-based Welsh Government household projections which were the latest published at the time. The LPA made an adjustment of a 10% uplift to the requirement to take account of other relevant factors, such as corporate objectives, economic strategy and affordable housing need, as listed in Section 3.3 of the adopted Powys LDP (2011-2016). At the time national advice was to treat the 2011-based household projections with caution due to the period of economic recession on which they were based.

6.2.2 The LPA later considered the lower requirements as published in replacement 2014-based household projections (issued just prior to the Plan's Examination in Public in 2017) however, the LDP housing requirement was not amended for reasons which are explained in Section 3.3 of the adopted Powys LDP (2011-2026).

6.2.3 Over time, there has been a slight change in emphasis on how the household projections should be used. When the LDP was initially being prepared PPW, Edition 7 (2014), stated that the Welsh Government's latest household projections should form the starting point for assessing housing requirements in LDPs, whilst later editions have advised they should be treated as part of the evidence base. The most recently published edition of PPW, Edition 11 (February 2021) confirms they must be treated as a fundamental part of the evidence base, and they therefore remain a key consideration for the Replacement LDP.

### Latest Population Projections

6.2.4 The 2018-based national population projections were issued in June 2020 (with the next release due September 2022), these were broken down to the Local Authority level and issued in August 2020. In 2018 the population of the County of Powys was **132,447**. According to the principal projection Powys was expected to experience a small decrease in the population between 2018 and 2020, but thereafter the population was expected to increase gradually year on year (to year 2043). By the LDP end date in 2026, the Powys population is forecast to be **132,765**.

6.2.5 These latest figures compare to the evidence of the 2011-based projections which stated the County of Powys population to be **133,071** in 2011 (LDP start date), and **136,489** by 2026 (18% of the population, as identified in the projections, is located within the Brecon Beacons National Park Authority (BBNPA) area, so the appropriate adjustment will be required for the Powys LPA area).

6.2.6 The differences between the 2011-based, 2014-based and 2018-based projections are illustrated in **Figure 1**. The black line on the graph shows the annual Mid Year Estimate of the population.

### The Mid Year Population Estimate

6.2.7 Mid Year Estimates (MYE) of the population are published annually. The latest MYE given for June 2020 (as published September 2021) indicated that the population of the County of Powys is **133,030** which represents an increase in population size of 595 (425 of them aged over 65) on the previous year.

6.2.8 This is a recent uplift as previously, the MYEs have shown a continuing decrease each year in the population of the County of Powys from the LDP start date in 2011 (133,071) to a low in 2016 (132,337), back up in 2017 (132,515), followed again by decreases in 2018 and 2019 (down to 132,435) before the recent recovery to **133,030** in 2020. The figures presented here, and the graph presented in Figure 1, relate to the whole of the County of Powys so, in terms of land-use planning, would need to be disaggregated between the two constituent Planning Authorities (the Powys LPA and the BBNPA).

6.2.9 MYE are useful in gauging the accurateness of the latest population and household projections which are not published as regularly. It is noticeable that the MYE for 2020 at **133,030** is above the figure projected in the 2018-based population projections. The MYE figure is 609 above that of the projection (**132,421**). The current MYE would suggest that the latest (2018-based) projections could be under-estimating the future population in Powys (which has a related impact on new household formation). However, for the Replacement LDP, the UK National Census 2021 results will establish new baseline figures going forward and will inform the MYE for 2021 (due to be published in 2022) which will provide a robust and timely starting point.

### Latest Household Projections

6.2.10 In planning for new homes, the LPA must have regard to the latest household projections which are generally released by the Welsh Government (broken down by Local Authority) every three years in conjunction with population projections. The population projections form the basis for generating the household projections.

6.2.11 Looking at the current Plan period (2011-2026) in Powys, under the principal (or central) household projection, the total number of households in Powys will increase from 59,700 in 2018 to 60,900 in 2026. This forecast is for the whole of Powys so will include some households situated in the Brecon Beacons National Park Authority (BBNPA) area of the county. **Table 4** below summarises how the household projections have changed during the LDP plan period.

**Table 4. Summary of the Changes to Household Projections for Powys\***

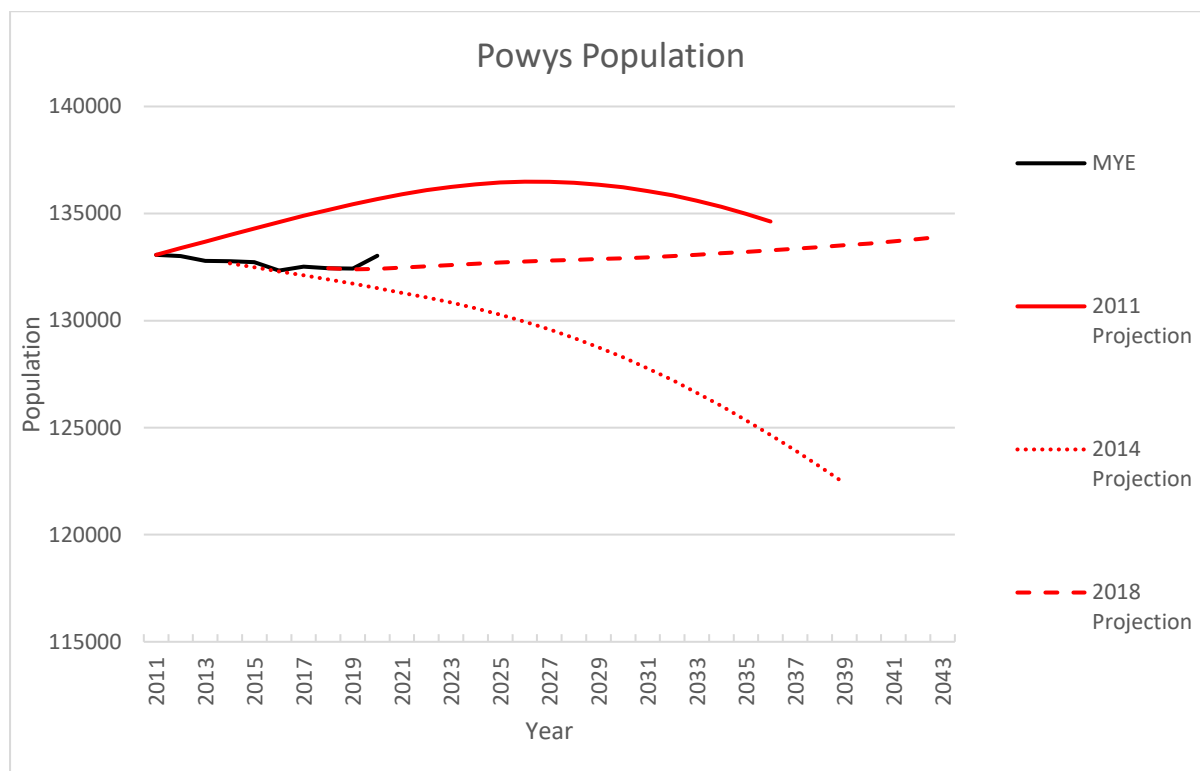
| Base-date of Projections | Households at base-date of Projections | Projected Households at 2026 – LDP End Date | Additional Households |
|--------------------------|--|---|-----------------------|
| <b>2011</b>              | 58,400                                 | 63,000                                      | 4,600                 |
| <b>2014</b>              | 59,000                                 | 60,000                                      | 1,000                 |
| <b>2018</b>              | 59,700                                 | 60,900                                      | 1,200                 |

*\*Further adjustments necessary to proportion homes between Powys LDP and BBNPA LDP.*

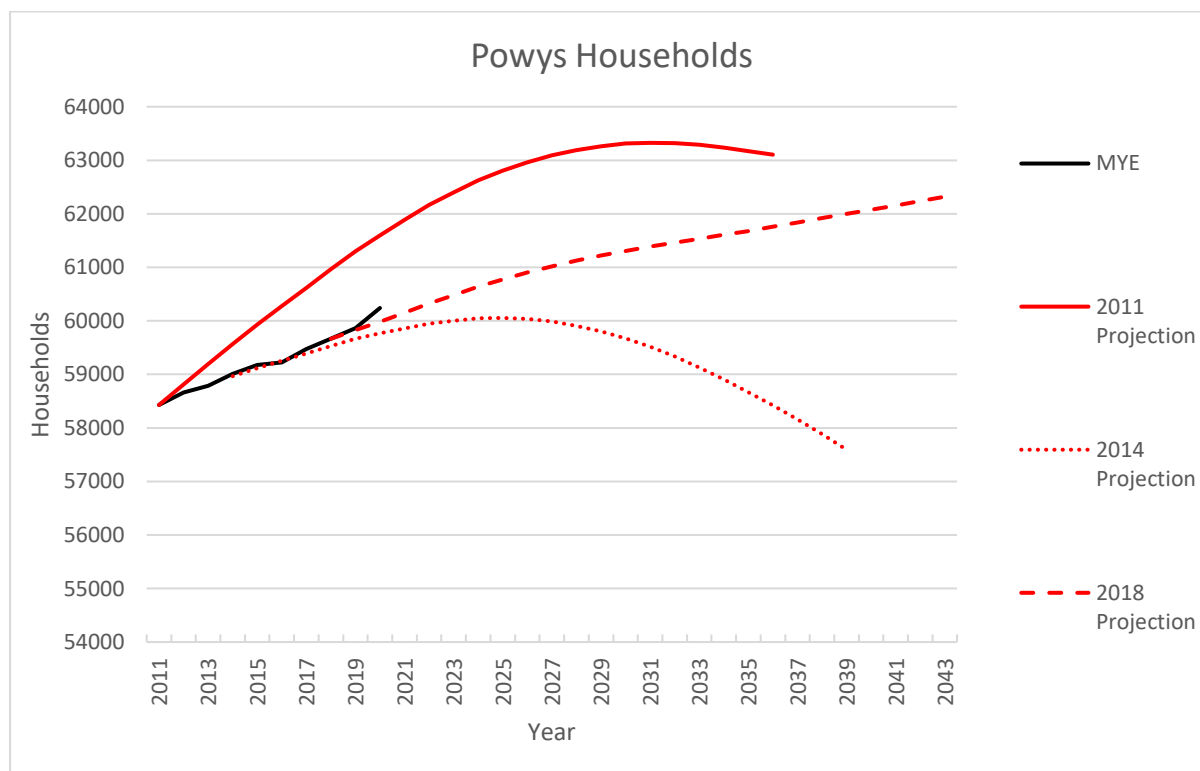
6.2.12 It can be seen the latest Welsh Government household projections indicate a much lower increase in household numbers than the 2011-based projections which informed the adopted Powys LDP. This indicates a fundamental need to reconsider the housing requirement as part of the preparation of a Replacement LDP.

6.2.13 The differences between the 2011-based, 2014-based and 2018-based household projections, based on the principal projections, are illustrated in **Figure 2**.

**Figure 1. Comparison of Welsh Government’s 2011, 2014 and 2018 Based Population Projections and Mid Year Estimates for the County of Powys**



**Figure 2. Comparison of Welsh Government’s 2011, 2014 and 2018 Based Household Projections (Principal Projection) and Mid Year Estimates for the County of Powys**



## Variant Population and Household Projections

6.2.14 The principal or central 2018-based projection is accompanied by five published variants. There are high and low population variants and three others based on alternative migration assumptions. These include a zero-migration variant, a 10-year average migration variant and a 15-year average migration variant. The variants help to capture the impact of migration and how the consideration of shorter versus longer term trends can lead to different scenarios in population (and therefore household) growth.

6.2.15 The availability of this dataset means that household growth under the principal household projection can be considered against alternative scenarios, the LPA will be considering and engaging with stakeholders on which variant(s) may be appropriate to use when revising the Growth Strategy for the Replacement LDP. The differences are summarised in **Table 5** below to show how the use of different variants impact on the number of households projected at the end of the adopted Powys LDP period (2026).

**Table 5. Local Authority Household Projections as Published 2020/2021 (2018 based) - The Six Alternatives\***

| Year  | Principal | Lower variant | Higher variant | Ten year average migration variant | Fifteen year average migration variant | Zero migration variant |
|---|-----------|---------------|----------------|------------------------------------|--|------------------------|
| <b>2018<br/>Base Date<br/>of Latest<br/>Projections</b>     | 59,664    | 59,664        | 59,664         | 59,664                             | 59,664                                 | 59,664                 |
| <b>2026<br/>The end<br/>date of the<br/>current<br/>LDP</b> | 60,906    | 60,516        | 61,224         | 60,872                             | 61,988                                 | 58,584                 |

\* Further adjustments necessary to proportion homes between Powys LDP and BBNPA LDP.

## The 2021 Census

6.2.16 The 2021 UK National Census results will be used to re-establish a new baseline for the Mid-Year Population and Household Estimates, correcting errors that have arisen over the previous 10 years. The new 2021 baseline population will be used in future projections and give a more accurate starting point.

## Summary of Current Position

6.2.17 At the time of writing, the 2018-based population and household projections are the latest published evidence and will inform early work on the Replacement LDP. However, results from the 2021 UK National Census (conducted March 2021) will provide essential primary evidence going forward with statistical releases expected in 2022 and 2023. In preparing the Replacement LDP the Council will be mindful of the need to be flexible to consider and, if necessary, adapt to these results as they become available. In reconsidering the Growth Strategy and housing requirement in the Replacement LDP,



population and household projections will be an important consideration, together with a number of other factors such as updated evidence within the Local Housing Market Assessment, past build rates and national, regional and local plans and strategies (this is discussed further in section 7.2).

## 7. LDP Issues, Vision, Objectives and Strategy

### 7.1 Key Issues and Considerations, Vision and Objectives.

#### Key Issues and Considerations

7.1.1 The LDP identified 48 Key Issues and Considerations facing the Plan area over the Plan Period, 2011-2026. Each issue is listed within the Plan and grouped under the following headings: Economic, Environmental, Population and Housing, Infrastructure and Resource considerations. The Key Issues and Considerations arose from stakeholder engagement, evidence gathering and the alignment of the LDP with other plans and strategies.

7.1.2 The Key Issues and Considerations were used to develop the Vision and Objectives, which set out the broad intentions of what the LDP seeks to achieve and for managing development up to 2026.

#### Vision

7.1.3 To address the Key issues and Considerations identified, the following LDP Vision was prepared with stakeholder involvement and in alignment with other plans and strategies for the area:

##### Our Vision of Powys 2026

Powys is a county of considerable variety extending from the South Wales Valleys to the Berwyn Mountains in the north, and from the Cambrian Mountains in the west to the English border in the east.

As the ‘green heart of Wales’, Powys will be a place of vibrant and resilient communities providing sustainable development and economic opportunities set in a healthy, safe environment, whilst celebrating, protecting, enhancing and sustainably managing its natural resources, native wildlife and habitats, heritage, outstanding landscapes and distinctive characteristics.

Powys’ towns and larger villages will be vibrant and accessible service centres. They will be the focus for integrating housing, economic and service development to meet their own needs and those of their surrounding communities.

Powys’ rural areas will be a working countryside of sustainable communities supported by a thriving and diverse rural economy of small businesses.

#### Objectives

7.1.4 The LDP includes 16 objectives cross referenced to the relevant Key Issues and Considerations and divided into the following Themes:

- Theme 1 – Planning for Growth in Sustainable Places,
- Theme 2 – Supporting the Powys Economy,
- Theme 3 – Supporting Infrastructure and Services,
- Theme 4 – Guardianship of Natural, Built and Historic Assets,
- Theme 5 – Supporting Healthy Communities.

## **Reconsideration of Key Issues and Considerations, Vision and Objectives**

7.1.5 Since the preparation of the LDP there have been some fundamental changes to national legislation and guidance. This includes the introduction of The Well-being of Future Generations (Wales) Act 2015 which sets out the framework for Welsh Government to formulate well-being objectives, which do not only influence national policy, but also direct local authorities. The LDP Key Issues and Considerations, The Vision and the Objectives all need to be reconsidered with an emphasis on the provisions of the Act and the well-being objectives, including consideration of the Council's Local Well-being Plan.

7.1.6 The Development Plans Manual Edition 3 (March 2020) advises that the objectives within the LDP must be linked to the National Sustainable Placemaking Outcomes. PPW, Edition 11 (February 2021) also states that “every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes”. Placemaking seeks to deliver “a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and wellbeing in the widest sense”. Placemaking and the National Sustainable Placemaking Outcomes must be incorporated into the revision of the LDP Vision and the Objectives.

7.1.7 Powys County Council (PCC) adopted a new Corporate Plan - Vision 2025: Our Corporate Improvement Plan 2021-2025 in April 2018 (refreshed in 2021). The new Corporate Improvement Plan, which is reviewed annually, sets out a seven-year vision for the county and its plans on how to achieve it. The LDP Key Issues and Considerations, and the LDP Vision and the Objectives, should be reconsidered to ensure alliance with current corporate priorities.

7.1.8 Stakeholder involvement and evidence gathering will determine the relevance of the Key Issues or whether changes or additions are required. This will include considering the Key Issues which have been addressed as well as those where issues remain an ongoing concern, together with newly identified issues such as those arising from the Covid-19 Pandemic.

## 7.2 The LDP Strategy

### The LDP Strategy

7.2.1 The over-arching Strategy sets out to achieve the Vision and Objectives of the Plan it is described in the LDP as:

“The LDP Strategy disperses new growth proportionately around the Plan area to meet housing, retail and employment needs, concentrating development into towns and large villages and ensuring that development in less sustainable areas is closely controlled. The Strategy supports strong communities and a diverse and working countryside and responds to the needs of the local area in terms of the provision of affordable housing and meeting specialist needs. Development is directed to locations within a sustainable settlement hierarchy and all development management decisions are made against a framework where the principles of sustainable development and guardianship of the natural, built and historic environment are fully embedded.”

7.2.2 The two main components of the LDP Strategy are the ‘Growth Strategy’ and the ‘Spatial Strategy’.

### Growth Strategy

7.2.3 The evidence relating to needs within the Plan area resulted in the LDP Strategy being primarily led by housing growth. The identified Dwelling Requirement Figure was for 4,500 additional new homes to be completed between 2011 and 2026. This included an Affordable Housing Target of 952 new affordable homes to be delivered during the period. Strategic policies SP1 – Housing Growth and SP3 – Affordable Housing Target provide the policy framework for delivering the ‘Growth Strategy’.

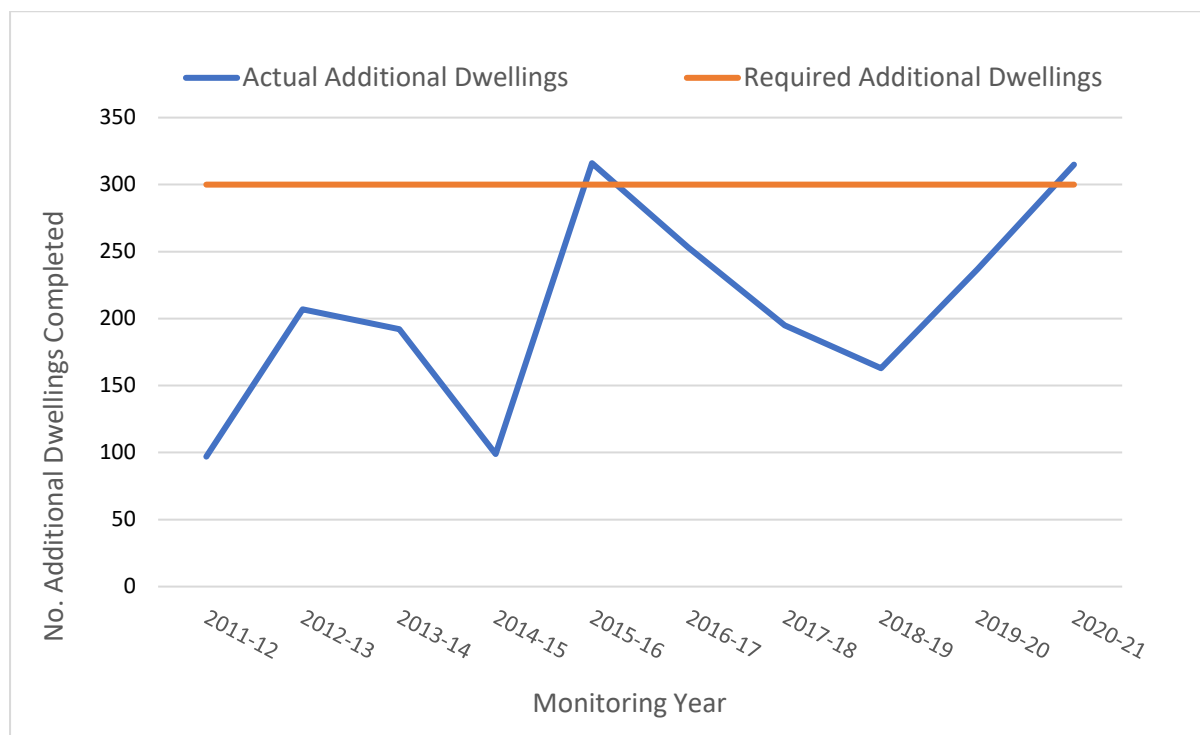
7.2.4 In order to meet the Dwelling Requirement Figure, an average of 300 additional homes would be required to be completed each year, across the 15-year plan period. **Figure 3** shows that in the ten years of the plan period that have passed, the completion rate of 300 additional homes was only achieved twice, further information regarding this is available in AMR 2021. The relatively low rate of completions has resulted in widening of the gap between annual completions and the annual average housing requirement, taken cumulatively, as shown in **Figure 4**. The cumulative average annual number of dwellings completed by the end of March 2021 equated to 2,101 new homes, this means a further 2,399 dwellings need to be completed over the remaining five years of the plan period (April 2021 to March 2026) if the dwelling requirement figure is to be reached. This would require an average completion rate of 480 additional homes a year, which based on past completion rates and the number of development sites progressing through the planning system is considered to be unrealistic and means the target of 4,500 new homes is unlikely to be met.

7.2.5 The failure to deliver the levels of housing growth set out in the plan is due to a variety of factors, one of which is the speed in which allocated sites are coming forward. On the 31<sup>st</sup> March 2021, 53 (66%) of the 80 housing sites allocated in the LDP did not have any form of planning permission. It was anticipated that by 31<sup>st</sup> March 2021, 845 dwellings would have been completed on allocated sites, but only 88 dwellings have been delivered.

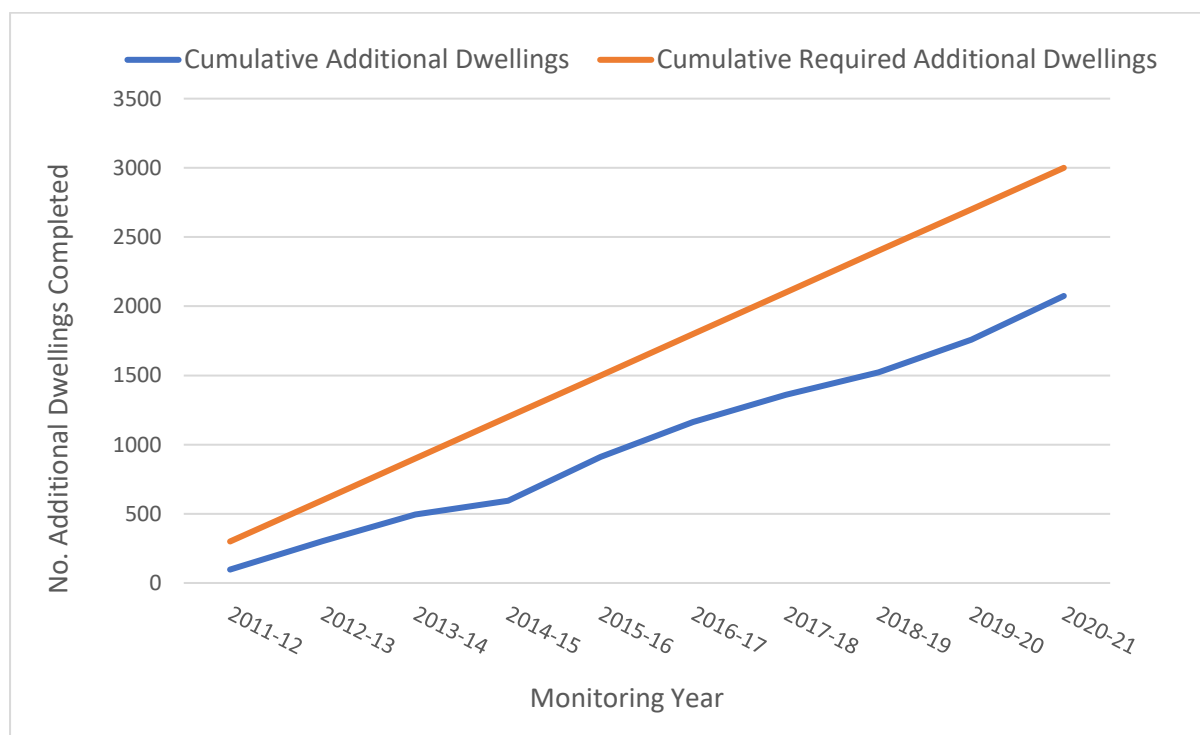
7.2.6 Due to the disparity between the number of dwellings being completed against the dwelling requirement, the current Growth Strategy and the housing allocations contained within the adopted Powys LDP cannot be carried forward and will need to be reconsidered

during the review. The Growth Strategy will need to reflect the future need of the Plan area, taking into consideration the most up-to-date population and household projections, together with evidence of need from sources such as the Local Housing Market Assessment, past build rates and national, regional and local plans and strategies.

**Figure 3. Number of Actual Additional Homes Completed Against Annual Average Requirement**



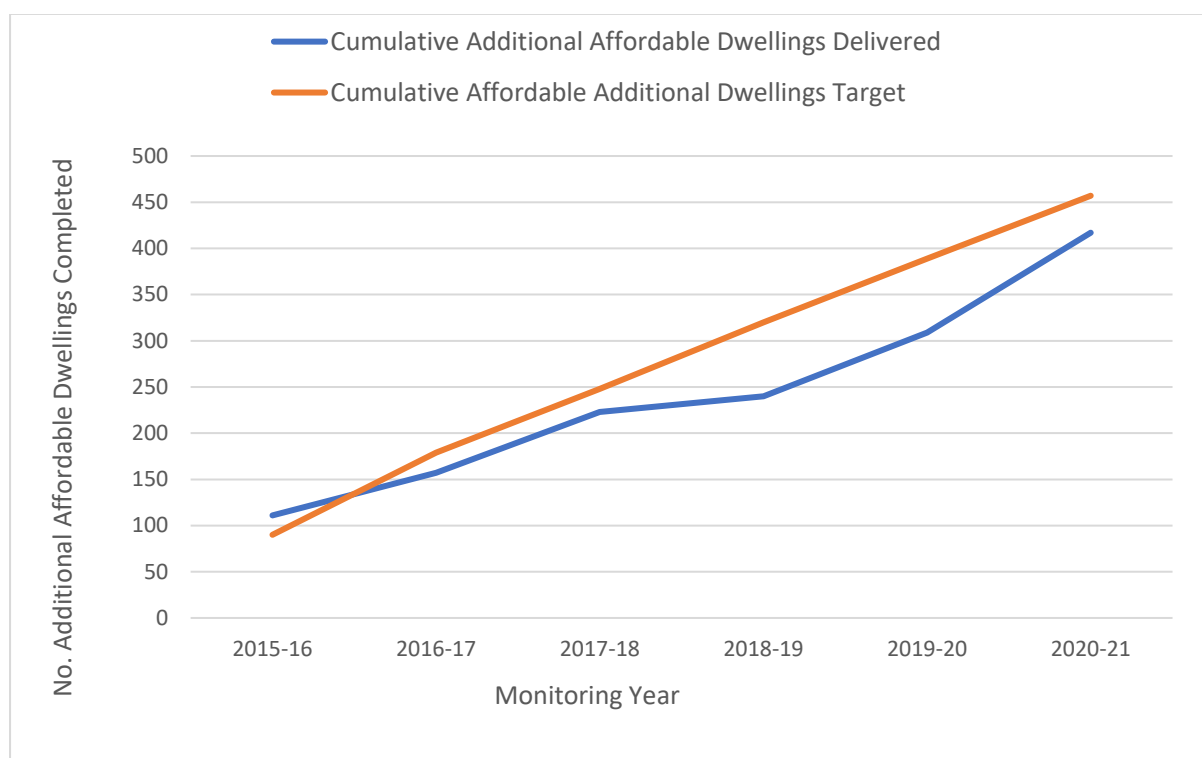
**Figure 4. Number of Cumulative Additional Homes Completed Against the Cumulative Annual Average Requirement**



7.2.7 With regards to the Affordable Housing Target of 952 new affordable homes to be delivered during the Plan period, 603 affordable dwellings were completed between 2011 and 2021. This means that a further 349 new affordable homes, equating to an average of 70 dwellings a year need to be delivered over the remaining five years of the LDP. Based on past build rates and the number of schemes coming forward this is considered to be achievable. **Figure 5** demonstrates how the difference between the cumulative affordable additional dwellings target and the number of cumulative additional affordable dwellings being completed is reducing.

7.2.8 Although it is anticipated that the LDP Affordable Housing Target will be met, this element of the Growth Strategy will be reviewed alongside the Dwelling Requirement Figure. This will include assessing the levels of need and mechanisms for the delivery of affordable housing, to determine a revised Affordable Housing Target for the Replacement LDP.

**Figure 5. Number of Cumulative Additional Affordable Homes Completed Against the Cumulative Affordable Additional Dwellings Target**



## Spatial Strategy

7.2.9 The Spatial Strategy aims to guide and distribute development to sustainable locations whilst protecting important strategic resources and assets. A key element of the LDP's Spatial Strategy is the definition of a sustainable settlement hierarchy which consists of:

- Towns
- Large Villages
- Small Villages
- Rural Settlements
- Open Countryside including the undeveloped coast.

7.2.10 Strategic policies SP5 – Settlement Hierarchy and SP6 – Distribution of Growth across the Settlement Hierarchy set out the sustainable settlement hierarchy and the level and distribution of growth for the different tiers. The Spatial Strategy directs growth to the Towns and Large Villages, whilst development in the lower tiers is carefully controlled ensuring a balance is struck between sustaining rural communities, meeting needs locally and protecting the Plan area's natural assets.

7.2.11 **Table 6** shows the percentage of housing growth planned for each of the tiers in the settlement hierarchy, against the percentage of dwellings permitted since the LDP was adopted in April 2018 and delivered since the housing provision base date of April 2015 (the date the housing components of the LDP were calculated).

7.2.12 The results show that the distribution of dwellings permitted across the settlement hierarchy since the LDP was adopted align with the Spatial Strategy. The distribution of dwellings completed since 2015 does not quite align with the Strategy, this is to be expected as many of the proposals received planning permission under the former Unitary Development Plan which had a different spatial strategy. It is expected that over the next few years the cumulative percentage of additional dwellings completed since 1<sup>st</sup> April 2015 will start to align more closely with the percentages of planned growth set out in Spatial Policy SP6.

**Table 6. Spatial Distribution of Housing Growth Permitted and Delivered**

| Settlement Hierarchy                | Cumulative Percentage of Dwellings Permitted since LDP Adopted | Cumulative Percentage Additional Dwellings Completed since 1 <sup>st</sup> April 2015 | Percentage Growth set out in LDP Spatial Policy SP6 |
|-------------------------------------|--|---|---|
| Town                                | 59%  | 45%   | >50%  |
| Large Village                       | 28%  | 23%   | >25%  |
| Small Village                       | 4%   | 9%  | <10%  |
| Open Countryside / Rural Settlement | 10%  | 23%   | <15%  |

7.2.13 **Table 7** shows the percentage of employment land growth planned for each of the tiers in the settlement hierarchy, against the percentage of employment land permitted since the LDP was adopted. The distribution of schemes for employment use is not quite as planned but does broadly align with the Spatial Strategy in that 69% of employment land is within the top two tiers of the hierarchy against the 70% planned growth.

7.2.14 The number of schemes permitted for employment uses are relatively low compared to housing. This means that a single application can skew the data which has been the case. Planning permission was granted for a major application on an allocated employment site located in a Large Village. This resulted in the percentage of employment land permitted in the Large Village tier being greater than the planned growth of 20%. It is expected that as more of the employment allocations in Towns come forward that the percentage of what has been permitted will align more closely to the percentages of planned growth set out in Spatial Policy SP6.

**Table 7. Spatial Distribution of Employment Growth Permitted**

| <b>Settlement Hierarchy</b>                                | <b>Cumulative Percentage of Employment Land Permitted since LDP Adopted</b> | <b>Percentage Growth set out in LDP Spatial Policy SP6</b> |
|--|---|--|
| <b>Town</b>  | 41%   | >50%   |
| <b>Large Village</b>                                       | 28%   | <20%   |
| <b>Small Village / Rural Settlement / Open Countryside</b> | 31%   | <30%   |

7.2.15 The LDP is now nearly two thirds of the way through the Plan period. **Table 6** and **Table 7** above indicate that the spatial delivery of housing and employment generally aligns with the spatial distribution of growth identified in the adopted Powys LDP. Therefore, with regard to the Spatial Strategy it would appear that LDP Strategic policies SP5 and SP6 are functioning effectively.

7.2.16 However, it is recognised that the reconsideration of the Growth Strategy will mean that reconsideration will also need to be given as to how growth is distributed. For example, a lower dwelling requirement figure could mean that it is not feasible to apportion allocated sites to all the settlements in the top two tiers of the settlement hierarchy as is now the case.

7.2.17 The Spatial Strategy also needs to be reviewed in light of the publication of Future Wales: The National Plan 2040 (February 2021). Future Wales has its own Spatial Strategy to which the Replacement LDP's Spatial Strategy will need to align. Additionally, Planning Policy Wales (Edition 11) requires LDPs to include an integrated planning and transport strategy which will have to inform the spatial strategy and overarching strategy of the Replacement LDP. The review of the Spatial Strategy will include stakeholder involvement and evidence gathering (including a revised settlement assessment and a review of the allocated sites). It will take into consideration the spatial strategy in Future Wales, National Sustainable Placemaking Outcomes and corporate priorities, together with issues such as recovery from the Covid-19 pandemic and constraints such as phosphate levels in Special Area of Conservation (SAC) riverine catchments.



## 8. LDP Topic Area Review

8.0.1 The policies in the adopted Powys LDP have been reviewed having regard to the following:

- The findings from AMR 2021, AMR 2020 and the Monitoring Review.
- Significant contextual changes that have taken place since the LDP was adopted, this includes changes to national policy and legislation.
- Consultation with relevant internal stakeholders and Development Management Officers.

8.0.2 **Appendix B** provides a short summary of the review for each of the policies listed within the LDP. Each summary gives an overview of whether the policy is functioning effectively, whether it needs to be reconsidered due to contextual changes or whether it needs to be revised or amended in some cases to improve clarity. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies during the preparation of the Replacement LDP.

8.0.3 The topic areas that are considered likely to require amendments to LDP Policy based on the policy review assessment are discussed in more detail below.

### 8.1 Housing

#### Housing Growth and Residential Allocations

(Policies SP1, H1, H2)

8.1.1 As detailed in Section 7.2 above, the Growth Strategy, which forms the basis for Strategic Policy SP1, was based on the identified Dwelling Requirement Figure of 4,500 additional new homes to be completed between 2011 and 2026. The number of additional new homes completed by the end of March 2021, as captured through monitoring, has resulted in a shortfall that cannot realistically be addressed before the end of the Plan period (2026).

8.1.2 Due to the disparity between the number of dwellings being completed against the Dwelling Requirement Figure, the current Growth Strategy and Strategic Policy SP1 cannot be carried forward into the Replacement LDP and will need to be reconsidered. The revised Dwelling Requirement Figure will need to reflect the future need of the Plan area, taking into consideration the most up-to-date population and household projections, together with evidence of need from sources such as the Local Housing Market Assessment (LHMA), as well as past build rates. The reconsideration of the Growth Strategy will mean that reconsideration will also be given as to how growth is distributed (the Spatial Strategy – Strategic policies SP5 and SP6 and Policy H1). A revised Spatial Strategy in the Replacement LDP, will need to align with the Spatial Strategy set out in Future Wales (February 2021) and the placemaking principles set out in PPW (Edition 11).

8.1.3 The LDP's residential allocations, identified in LDP Policy H2, will require amendment as part of the revision process. Undelivered Housing Allocations (HA) will need to be reconsidered, which is likely to result in many existing allocations not being taken forward into the Replacement LDP. It will also be necessary to allocate new deliverable and viable sites to meet the revised Dwelling Requirement Figure over the new Plan period (2022-

2037). The status of each Housing Allocation (HA) and Housing Commitment (HC) identified by the current LDP is summarised in **Appendix C**.

### **Affordable Housing**

(Policies SP3, H5, H6)

8.1.4 The LDP sets out a Policy framework for the delivery of Affordable Housing through Strategic Policy SP3, and Topic Based Policies H5 and H6. The policy framework sets out targets and thresholds for requiring private residential developments to contribute to affordable housing and allows small scale affordable housing developments on exception sites, outside of the development boundaries of Towns and Large Villages and in Small Villages and Rural Settlements.

8.1.5 The LDP sets an Affordable Housing Target of 952 new affordable homes to be delivered during the Plan period (2011-2026). In total 603 affordable dwellings have been completed between 2011 and 2021, meaning a further 349 new affordable homes need to be delivered over the remaining five years of the LDP. Based on past build rates and the number of schemes coming forward this is considered to be achievable.

8.1.6 The number of affordable dwellings delivered has been heavily influenced by the number of affordable dwellings being delivered through the Local Housing Association's (Registered Social Landlords, RSL), and the Council's housing building programmes. In terms of affordable housing delivered on market developments, the results of the Annual Monitoring Reports found that, on average, the policy target for affordable housing contributions, set out in LDP Policy H5, is being met or exceeded in the Severn Valley and North Powys sub-market areas. The average contribution secured in the Central sub-market area was below the policy target due to sites securing initial planning permission under the previous Unitary Development Plan.

8.1.7 As part of the review the Affordable Housing target and policy framework will need to be reconsidered to reflect a revised Growth Strategy and Dwelling Requirement Figure that covers the Replacement Plan period (2022 – 2037). This will result in a revision of the Affordable Housing Target – Strategic Policy SP3. The affordable housing policy framework in the Replacement LDP will also need to take into consideration updated evidence including the most recent Local Housing Market Assessment, viability evidence, evidence of affordability of the housing stock and local need, together with stakeholder engagement (Registered Social Landlords and the Strategic Housing Authority) this may lead to changes to LDP policies H5 and H6.

8.1.8 Changes to national planning policy / guidance will also need to be taken into consideration. Of particular importance is Policy 7 in Future Wales (February 2021) which requires planning authorities to identify sites for affordable housing led developments. Future Wales also gives an estimate that of the additional homes needed in the Mid Wales Region, 61% should be affordable homes.

### **Specific Housing Policies**

(Policies H3, H4, H7, H8, H9)

8.1.9 The housing policy framework includes policies relating to housing density (H4), householder development (H7), the renovation of abandoned dwellings (H8) and replacement dwellings (H9). These policies will all be reconsidered against the placemaking

principles and any other contextual changes that have occurred since the LDP was adopted in April 2018.

8.1.10 LDP Policy H4 - Housing Density will also give regard to recommended densities set out in national planning policy/guidance, particularly for housing development in the Regional Growth Areas, where Policy 2 of Future Wales will apply. Further research will be undertaken to inform the approach towards housing density across settlement tiers and development types.

8.1.11 LDP Policy H9 – Replacement Dwellings, as part of this review, issues have been identified with the interpretation of this policy, particularly around identifying and assessing buildings of local vernacular character. Further policy clarification may be needed to reflect archaeological assessment requirements.

## **Gypsy and Traveller Sites and Caravans**

(Policies H10, H11)

8.1.12 The policy framework provided through LDP Policy H10 – Gypsy and Traveller Sites and Caravans and LDP Policy H11 – Gypsy and Traveller Site Provision, ensures there is adequate pitch provision to accommodate the needs of the community over the Plan period. The policy framework includes the allocation of two sites and a criteria policy to assess applications for new sites.

8.1.13 LDP Policy H11 - Gypsy and Traveller Site Provision, made provision for seven gypsy and traveller pitches to be delivered within the Plan period (2011-2026). The seven pitches were identified in the 2008 Gypsy and Traveller Accommodation Needs Assessment (GTAA) (updated 2014 and 2016), with the need split across two sites, one in Machynlleth and one in Welshpool. The Welshpool site included provision for two pitches which were completed by 31<sup>st</sup> March 2019. Whilst the Machynlleth site included provision for five pitches, these were completed on 5<sup>th</sup> March 2021. The status of both sites is summarised in **Appendix C**.

8.1.14 LDP Policy H10 is expected to continue to be supportive and flexible towards the provision of sites where required. The wording will be reviewed to ensure it remains up to date and relevant to current policy requirements and arising needs.

8.1.15 LDP Policy H11 will be revised to reflect a replacement GTAA which is to be published in accordance with Welsh Government review periods. The revised GTAA will identify need up to 2037, where provision is required, it will result in new sites being included within the Replacement LDP.

## **8.2 Economic Development**

8.2.1 The LDP sets out a Policy framework for the Economic Development of the Plan area, which focuses on the traditional B1, B2 and B8 use classes. The policy framework includes both allocated and safeguarded sites, together with a suite of strategic, development management and topic-based policies.

## Employment Allocations

(Policies SP2, E1, E3)

8.2.2 The LDP was informed by the Powys Economic Needs Assessment Study (2011) (updated 2015) which estimated a need of 30-42 hectares of land to be available for economic growth during the Plan period (2011 – 2026). The Powys Economic Needs Assessment Study also recommended that a flexibility allowance equivalent to five years supply should be taken into consideration. In total therefore, the Study recommended a requirement for 40-56 hectares of employment land to be made available within the LDP. This resulted in 45 hectares of allocated employment sites being included within the adopted Powys LDP, Strategic Policy SP2, Topic Based Policies E1 and E3.

8.2.3 To meet the minimum employment requirement of 30 hectares, an average take up rate of two hectares per annum would be expected. The results from AMR 2021 show that since the LDP was adopted (17<sup>th</sup> April 2018) to 31<sup>st</sup> March 2021 a total of 6.11 hectares of employment land was permitted on the allocated employment sites. Whilst the 6.11 hectares appears to demonstrate that the LDP is delivering, detailed analysis shows that the 6.11 hectares is made up of a relatively small number (six) of large planning applications.

8.2.4 As part of the review process the evidence relating to economic development will be updated, this will include the undertaking of an Employment Land Review (ELR), whilst a Mid-Wales regional strategic employment site study is already underway. This evidence together with alignment of the Replacement LDP with other Plans and Strategies and the revised Growth and Spatial Strategy will determine the employment requirement for the Replacement Plan period.

8.2.5 As part of the revision process any undelivered employment allocations will need to be considered, this may result in existing allocations not being taken forward into the Replacement LDP. It may also be necessary to allocate new deliverable and viable sites to meet the revised Employment Requirement over the Replacement LDP Plan period (2022-2037). The status of each Employment Allocation (EA), Employment Commitment (EC) and Mixed Use Allocation (MUA) identified by the current LDP is summarised in **Appendix C**.

## Safeguarded Employment Sites

(Policies DM16, E4)

8.2.6 The policy framework for economic development includes the safeguarding of existing employment sites. These sites are identified spatially on the proposals map and serve to protect existing employment areas, restricting new developments to employment uses.

8.2.7 AMR 2021, AMR 2020 and the Monitoring Review found that the policies relating to employment safeguarding are being used appropriately. The Review will consider whether the list of safeguarded sites in the LDP, is up-to-date and relevant and if the policies are compliant with national policy and updated evidence. Consideration will also be given to the relationship between LDP policies DM16 and E4 and how these policies relate to the rest of the economic development policy framework (e.g. with regards to ancillary uses).

## Employment Proposals on Non-Allocated Employment Sites

(Policy E2)

8.2.8 AMR 2021 demonstrates that the majority of planning applications (14 out of 18 in 2020-2021) permitted for employment uses are on non-allocated sites. This includes the conversion / change of use of buildings, extension, redevelopments, and new builds.

8.2.9 The AMRs and the Monitoring Review found that not all applications permitted complied with LDP Policy E2, in some cases compliance was with LDP Policy E7 or with National Planning policies TAN 6 or TAN 23 instead. Consideration needs to be given, during the review, to how LDP Policy E2 relates to the rest of the economic development policy framework including national policy to ensure consistency and clarity.

### Specific Economic Development Policies

(Policies E5, E6, and E7)

8.2.10 The economic development policy framework includes policies relating to Farm Diversification (E6) and Home Working (E7). These policies will all be reconsidered against Future Wales, placemaking principles and any other contextual changes that have occurred since the LDP was adopted in April 2018. Consideration will also be given to improve the clarity of the wording of these policies, particularly with regards to diversification within agriculture alongside diversification away from agriculture in LDP Policy E6. **The LPA will consider, where appropriate, putting in place an appropriate policy in the Replacement LDP relating to intensive agricultural development, as advised by the Welsh Government in the letter to Chief Planning Officers in June 2019. The need to prevent soil degradation from new farming enterprises requiring planning permission will be considered as part of the Replacement LDP process.**

8.2.11 LDP Policy E5 – Bronllys Health Park will also be reconsidered to determine if such a policy is still appropriate for the Replacement LDP or whether an alternative approach is necessary.

8.2.13 Future Wales (February 2021) states that “Local Development Plans should identify the role of the foundational economy, consider how the land-use planning system can support it and develop appropriate policies. Areas of the foundational economy which the planning system can support include regeneration initiatives, health and social care, social housing, tourism and steps to encourage greater community benefits from new development.” It is therefore anticipated that the Replacement LDP will include economic development policies relating to the foundational economy.

8.2.14 A further contextual change that will need to be considered when reviewing the economic development policies is the Mid Wales Growth Deal particularly for those projects with land use implications.

## 8.3 Transport

(Policies T1, T2, T3, DM13 criterion 10)

8.3.1 LDP Policy T1 – Travel, Traffic and Transport Infrastructure, seeks to enable transport and traffic infrastructure improvements to ensure an efficient, effective and integrated system whilst having regard to the safety of all users. This policy is supported by LDP Policy DM13 criterion 10, which requires development to be designed and located to minimise the impacts on the transport network. Both policies have been effective, however it

is anticipated that the policies will be reconsidered to reflect the emphasis in PPW and Future Wales (February 2021) regarding sustainable travel and the transport hierarchy. PPW states that “an important consideration will be minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport”, this needs to be reflected in the Replacement LDP.

8.3.2 LDP Policy T2 – Safeguarding of Disused Transport Infrastructure, this LDP policy was not used in the periods of monitoring undertaken (17<sup>th</sup> April 2018 to 31<sup>st</sup> March 2021). PPW (Edition 11) paragraph 5.3.8 states “Disused railways and disused or unused rail sidings should, in collaboration with Transport for Wales and Network Rail, be safeguarded from development which could adversely affect them being brought back to rail use in the future. Any planning application or proposed development plan policy in the vicinity of, or directly affecting a former railway line should consider the impact on their potential use for rail in the future. As an interim measure, it may be appropriate to use disused rail alignments as open space corridors, for example for walking and cycling”.

8.3.3 Research will be undertaken to identify the disused railways and disused or unused rail sidings and other transport infrastructure, in the Plan area, as part of the review process. This research will enable an understanding of the policy approach to be taken going forward and may lead to the identification of Green Infrastructure opportunities.

8.3.4 LDP Policy T3 – Newtown By-pass, this policy was included within the LDP to ensure the proposed route of the Newtown Bypass was safeguarded and protected. Now that the Newtown Bypass is fully operational the policy is no longer required and will not be included in the Replacement LDP.

8.3.5 PPW (Edition 11) requires LDPs to include an integrated planning and transport strategy. This will need to set out how the LPA will:

- integrate and co-ordinate sustainable transport and land use planning;
- facilitate and promote accessibility for all;
- reduce the need to travel;
- reduce dependency on private vehicles;
- prioritise and support walking, cycling and use of public transport
- support the uptake of Ultra Low Emission Vehicles;
- reduce transport related airborne pollution; and
- facilitate the provision of transport infrastructure and necessary sustainable transport improvements and development.

8.3.6 It is therefore anticipated that the Replacement LDP will include a strategic policy relating to integrated planning and transport and that the policy framework will be amended to reflect the growing emphasis on sustainable travel.

## 8.4 Planning for Retailing and Town Centres

(Policies R1, R2, R3, R4)

8.4.1 The retailing and town centres policy framework includes policies relating to new retail developments, development within town centres, and neighbourhood and village shops and services, together with the allocation of a retail site.

8.4.2 As part of the LDP review process the evidence base with regards to retail will be updated, this will include an update to the Retail Study. It is anticipated that LDP Policy R1, which defines the retail hierarchy for the Plan area, will be amended in the Replacement LDP to reflect the findings of the updated Retail Study and the revised Spatial Strategy.

8.4.3 LDP Policy R2 identifies the Former Kaye Foundry site in Presteigne as the single retail allocation for the LDP. The site has not progressed as intended, as detailed in AMR 2021. The status of this Retail Allocation LDP is summarised in **Appendix C**. The location and need for any retail allocations will be reviewed through the updated Retail Study which will inform the Replacement LDP.

8.4.4 LDP Policy R3 concerns development within town centre areas. AMR 2021 identified issues with this Policy with regards to some of the Primary Shopping Frontages having less than the policy specific target percentage of at least 75% of units being in the A1 and A3 use class orders. This applied to four of the ten towns that have Primary Shopping Frontages with another two towns having a current mix of uses which are very close to the minimum threshold. The review process will take the opportunity to revise this policy and the Primary and Secondary Shopping Frontages.

8.4.5 Consideration will be given with regards to how LDP Policy R3 relates to the Spatial Strategy, the rest of the retailing and town centres policy framework, and national guidance. Particular attention will also be given to town centre Covid -19 recovery programmes and the impact of online shopping and out of town retail parks upon the high street.

8.4.6 LDP Policy R4 relates to the provision of new neighbourhood and village shops and services. This policy will be reconsidered to ensure it continues to be supportive of new services, up to date and relevant to sustainable place-making in line with the revised Growth and Spatial Strategy. Links to LDP policies C1 (Community Facilities and Indoor Recreation Facilities) and DM11 (Protection of Community Facilities and Services) will also be reconsidered to ensure a cohesive approach to supporting sustainable communities.

## 8.5 Planning for Tourism

(Policies TD1, TD2, TD3)

8.5.1 The planning for tourism policy framework includes policies for new tourism developments, the alternative uses of existing tourism developments and a site-specific policy for the Montgomery Canal.

8.5.2 LDP Policy TD1 - Tourism Development is an enabling policy. Between the monitoring reports: AMR 2021, AMR 2020 and the Monitoring Review, it was found that 205 planning applications had been granted that resulted in new units of tourism accommodation, since the adoption of the LDP. This equated to 798 separate units, which included holiday lets, static caravans, glamping pods, shepherds' huts, tree houses and other similar forms of holiday accommodation.

8.5.3 It is recognised that the growth in the tourism sector will have brought economic benefits to the Plan area. However, reconsideration will be given to the wording of this Policy (TD1) and the Landscape Policy (DM4) to ensure the growth in the tourism sector does not result in any adverse cumulative environmental impacts.

8.5.4 LDP Policy TD2 - Alternative Uses of Existing Tourism Development. This policy is functioning effectively; however, it would benefit from the definition of a rural area being clarified in line with the revised Spatial Strategy.

8.5.6 LDP Policy TD3 – This policy relates to the Montgomery Canal with a particular focus on its restoration and its designation as a Special Area of Conservation (SAC) as part of the National Site Network. This policy will be reviewed to take into consideration funding being secured through the Mid-Wales Growth Deal and the UK’s Levelling Up Fund. Further consideration also will be given in the Replacement LDP, as to whether a policy relating to the Montgomery Canal should sit in the tourism policy framework or whether an area policy would work better. This would reflect the fact that the Montgomery Canal sits across several topic areas including tourism, biodiversity, Green Infrastructure, Active Travel and economic development and would align the policy to the principles of placemaking within the context of the SAC designation.

8.5.7 Consideration will also be given to how to address other important tourism and heritage features as part of the Replacement LDP process, such as the industrial heritage associated with the Swansea Canal in the Ystradgynlais and Abercraf areas highlighted by the Swansea Canal Society.

## 8.6 Waste

(Policies DM15, W1, W2)

8.6.1 The waste policy framework includes policies related to dealing with waste in new developments (DM15), the location of waste development (W1) and waste management proposals (W2).

8.6.2 The policy framework aligns with national policy due to the policies being drafted after the publication of the Welsh Government Strategy “Towards Zero Waste - the Waste strategy for Wales” (2010) and takes into consideration the ‘waste hierarchy’. In March 2021, the Welsh Government published “Beyond Recycling – A strategy to make the circular economy in Wales a reality” followed by the “Strategic Assessment for the future need for energy from waste capacity in the three economic regions of Wales”. The waste policies will be reconsidered to reflect the growing emphasis on minimising waste and the circular economy, PPW (Edition 11), local and regional priorities and strategies and any updated evidence.

8.6.3 It has been noted that LDP Policy DM15, which concerns the management of waste within developments, has not been implemented as widely as intended, discussions will take place with Development Management in the review of this policy to address the matter.

## 8.7 Sustainable Energy

(Policies RE1, DM13 criteria 13 and 14)

8.7.1 LDP Policy RE1 – Renewable Energy, provides the basis for the renewable energy element of the Sustainable Energy policy framework, alongside LDP Policy DM13 criterion 13 which requires development proposals to demonstrate the sustainable and efficient use



of resources within their design. LDP Policy DM13, criterion 14 requires investigations to be undertaken into the feasibility of district heating networks wherever a development proposals heat demand density exceeds 3MW/km<sup>2</sup>.

8.7.2 LDP Policy RE1 includes the criteria to which planning applications for renewable energy proposals are assessed and the identification of twenty Local Search Areas (LSAs) for medium to larger scale solar photovoltaic proposals. The AMRs and the Monitoring Review, for the period from LDP Adoption to 31<sup>st</sup> March 2021, found that no applications for solar photovoltaic proposals were permitted in any of the LSAs during the period.

8.7.3 LDP Policy RE1 also includes the renewable energy electricity and thermal contributions that the Plan area is potentially able to achieve, towards meeting national energy targets from a range of renewable energy sources. The AMRs and the Monitoring Review, for the period from LDP Adoption to 31<sup>st</sup> March 2021, found that the applications permitted for renewable energy schemes equated to:

- Electricity; 36.7311MW
- Thermal; 20.069MW

8.7.4 This meant that the contribution in the LDP with regards to additional thermal installed capacity has been met and that the LDP is on target to meet the additional installed capacity contribution with regards to electricity generation.

8.7.5 The evidence base informing the development of the LDP policies included a Renewable Energy Assessment (REA) (updated 2017) and the provision of a Landscape Sensitivity Study. The policy framework, evidence base and documents for this topic will need to be reconsidered and revisited in the light of changes to national policy and consenting regimes and changes in renewable energy technologies.

8.7.6 All proposals for onshore generating projects between 10MW and 350MW capacity are now dealt with by Welsh Ministers with Local Authorities determining only those proposals below an installed capacity of 10MW.

8.7.7 Future Wales (February 2021) sets out a policy framework for the determination of renewable energy proposals, this includes the designation of 'Pre-Assessed Areas for Wind Energy'. In the 'Pre-Assessed Areas for Wind Energy' there is a presumption in favour of large-scale onshore wind energy development and the associated landscape change, subject to the criteria in policy 18 of Future Wales. Three (areas 3,4 and 5) of the ten Pre-Assessed Areas sit within the Powys LDP area with a further Pre-Assessed Area (area 9) intersecting the border to the Southwest of the Plan area.

8.7.8 Policies 17 and 18 of Future Wales are strategic, spatial and detailed criteria-based policies which need to be considered together in the determination of planning applications, along with detailed advice on assessing benefits and impacts in PPW. Outside of Pre-Assessed Areas a positive policy framework exists, subject to Policy 18. TAN 8 which informed the Powys LDP was revoked following the publication of Future Wales (February 2021).

8.7.9 Policy 16 of Future Wales sets out the Policy Framework for District Heat Networks which includes the identification of Priority Areas. The inclusion of the policy at the national level means that the LDP Policy DM 13 criterion 14 is unlikely to be included within the Replacement LDP.

8.7.10 The Sustainable Energy policy framework in the Replacement LDP will need to be reflective of the changes mentioned above. Consideration will be given to including policies that relate to:

- reducing energy demand,
- promoting the use of energy efficiency,
- providing criteria for the determination of small-scale renewable energy developments (PPW 5.9.15),
- locational policies for Renewable and Low Carbon Energy Development below 10 MW (PPW 5.9.14).

8.7.11 Consideration will also be given as to whether to include a development plan policy requiring applications for major development to be accompanied by an Energy Report (as per PPW Edition 11, paragraph 5.8.4).

## 8.8 Minerals

(Policies DM8, DM9, M1, M2, M3, M4, M5)

8.8.1 The policy framework for minerals provides for the protection of Existing Mineral Sites (M1), the permitting of New Mineral Sites (M2), Borrow Pits (M4), a criteria-based policy for Minerals Proposals (M4) and a policy for the Restoration and Aftercare (M5) of mineral sites. The LDP also includes a Development Management policy for Mineral Safeguarding (DM8) which relates to the Nationally and Regionally Important primary aggregate mineral resources identified on the Aggregates Safeguarding Map for Wales (November 2012). The LDP also includes a Development Management Policy DM9 (Existing Mineral Workings) which seeks to protect existing workings.

8.8.2 The evidence base informing the development of these policies includes the Minerals Topic Paper. Guidance for mineral extraction and related development in Wales is set out in the updated PPW and supplemented by Minerals Technical Advice Notes (MTAN).

8.8.3 Under the provisions of MTAN1, Wales is divided into two Regional Aggregates Working Party (RAWP) areas (north and south). Powys is represented on the South Wales Regional Aggregates Working Party (SWRAWP), which is charged with preparing a Regional Technical Statement (RTS) setting out how aggregates demand will be met in the region for a 15-year period. The RTS assesses the demand and supply of aggregates within the region and considers the environmental capacity of each Mineral Planning Authority (MPA) to make a contribution to meeting the regional demand.

8.8.4 The SWRAWP published an updated RTS (2<sup>nd</sup> Review) in 2020, which has been endorsed and adopted by the Council. The implications of the statement will need to be fully considered as part of the LDP review. The Replacement LDP will need to continue to show evidence that the Authority has the necessary landbank of aggregate reserves to meet the identified need. Evidence set out in the Annual Monitoring Reports and the Monitoring Review, for the period from LDP Adoption to 31<sup>st</sup> March 2021, indicate that the Plan area has more than an adequate landbank of hard rock aggregates to meet identified need, and there has been no sand and gravel apportionment for the Powys Minerals Planning Authority area. Therefore, it is unlikely that any new allocations will be required.

8.8.5 PPW (Edition 11) requires that development plans assess with regard to local, regional and national considerations, the significance of all types of mineral working in their area including the need, distribution and production of each type of mineral and of the reserves for which planning permission has been granted. It is essential to have a comprehensive and up-to-date set of information to facilitate future sustainable planning for mineral extraction. This will be considered as part of the evidence for the Replacement LDP.

8.8.6 Following the declaration of a 'climate emergency' and the need to decarbonise the economy, Welsh Government policy is no longer supportive of the working of coal for energy generation. PPW (Edition 11) states that “proposals for opencast, deep-mine development or colliery spoil disposal should not be permitted” unless in wholly exceptional circumstances. There is also no longer a requirement for LDP policies to safeguard coal resources or to indicate where coal operations would not be acceptable. Therefore, LDP Policy DM8 and the proposals maps will be amended to remove reference to surface coal.

8.8.7 LDP Policy DM8 – Mineral Safeguarding AMR 2021, AMR 2020 and the Monitoring Review all found issues with the implementation of this policy. This may result in the Policy being amended to improve clarity in the Replacement LDP.

## 8.9 Community and Indoor Recreation Facilities

(Policies DM11, C1)

8.9.1 The policy framework in relation to community and indoor recreation facilities consists of two policies LDP Policy DM11 – Protection of Existing Community Facilities and Services and LDP Policy C1 – Community Facilities and Indoor Recreation Facilities, for new facilities.

8.9.2 LDP Policy DM11 seeks to protect community facilities and services unless an alternative use can be justified in accordance with the policy. AMR 2021 found that the planning applications determined, between 1<sup>st</sup> April 2020 and 31<sup>st</sup> March 2021, that involved a loss of community facilities and services were carefully considered against the criteria set out in LDP Policy DM11, alongside any other relevant national and local planning policies. However, it also found inconsistency in the way that the policy was applied, particularly where re-development of a site was involved and considered that the policy was not being implemented entirely as intended. AMR 2021 recommended officer training to address the issue, however consideration will also be given to the clarity of the wording of the Policy.

8.9.3 LDP Policy C1 - is considered to be working effectively, however consideration will be given to its relationship with Policy DM11.

8.9.4 Consideration will also be given in the Replacement LDP to providing a comprehensive list of community services.

## 8.10 Military Operations

(Policies MD1, SP7 criterion 5)

8.10.1 The Sennybridge Training Area, which is located with the Powys LDP area, is a site of strategic military importance for the UK. The LDP provides for its safeguarding and operational effectiveness through LDP Policy SP7, criterion 5. LDP Policy MD1 supports development proposals submitted by the Ministry of Defence where they sustain an operational use of an existing facility.

8.10.2 It was found that between the period from LDP Adoption to 31<sup>st</sup> March 2021, LDP Policy MD1 had not been used. Consideration will be given as to whether Policy MD1 should be included in the Replacement LDP in its current form and if any changes are required.

## 8.11 Environmental Protection

### The Natural Environment

(Policies SP7, DM2)

8.11.1 LDP Policy SP7 includes the safeguarding of sites designated at the international and national level, whilst LDP Policy DM2 provides for the protection, positive management and enhancement of biodiversity and geodiversity interests.

8.11.2 Both policies SP7 and DM2 will need to be updated to reflect the changes arising from the UK's withdrawal from the European Union ("Brexit") whereby 'European Sites' are now the 'National Site Network'. Biodiversity and Geodiversity policy within Future Wales (February 2021) and PPW (Edition 11) includes for the strengthening of the role and importance of biodiversity considerations within the planning system, following on from the Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty (the Section 6 duty) for public authorities requiring them to seek to maintain and enhance biodiversity in the exercise of all their functions. The emphasis on placemaking within PPW is also likely to be relevant in respect of complying with this duty.

8.11.3 Both Future Wales and PPW require development plans to undertake a Green Infrastructure Assessment and to include policies for its safeguarding and to identify opportunities where existing and potential green infrastructure could be maximised. The Replacement LDP will need to consider how to incorporate Green Infrastructure policies which not only relate to the biodiversity and geodiversity topic areas but open space, flooding, landscape and placemaking as well.

8.11.4 AMR 2021 raised concerns that the policy in relation to the protection of local geodiversity assets is not being implemented as intended. In the first instance Officer training has been recommended but consideration will be given as to whether the policy would benefit from amended wording to improve clarity.

## **Historic Environment**

(Policies SP7, DM13 criterion 2 and 3)

8.11.5 The safeguarding of historic environment designations is included within Strategic policy SP7, whilst Policy DM13 – Design and Resources requires development proposals to contribute towards the preservation of local distinctiveness and sense of place within their design. LDP Policy DM13 also requires development proposal to take into consideration Conservation Areas and their setting.

8.11.6 No issues were identified in AMR 2021, AMR 2020 or the Monitoring Review in relation the historic environment elements of policies SP7 and DM13. However, the policies will be reconsidered to reflect any changes to national planning policy and guidance, particularly in respect of sustainability and placemaking principles.

8.11.7 Concerns have been raised that the historic environment is not being adequately considered in the implementation of LDP Policy H9 (Replacement Dwellings), consideration will be given to addressing these concerns in the Replacement LDP.

## **Pollution and Flooding**

(Policies DM5, DM6, DM7, DM10, DM14)

8.11.8 The policy framework relating to pollution and flooding includes Development Management policies relating to Development and Flood Risk (DM5), Flood Prevention Measures and Land Drainage (DM6), Dark Skies and External Lighting (DM7) Contaminated Land (DM10) and Air Quality (DM14).

8.11.9 The two LDP policies that relate to flood risk and land drainage (DM5 and DM6) will be reconsidered to reflect the new TAN 15 and Flood Map for Planning (due to come into

force June 2023) and the implementation of the Flood and Water Management Act 2010 (Schedule 3), which came into effect in Wales on 7<sup>th</sup> January 2019. Schedule 3 requires new developments to include SuDS features that comply with set national standards for developments of more than one dwelling or with a construction area of over 100 metres squared.

8.11.10 The Dark Skies and External Lighting Policy has been widely used in the consideration of planning applications. However, it has been noted that it is primarily used in relation to minimising impacts on biodiversity, rather than in relation to the full scope of the policy, which includes criteria relating to light pollution, visibility of the night sky, amenity of local residents and safety of highway users, including pedestrians. Consideration will be given on how this can be addressed in the Replacement LDP.

8.11.11 Consultation with internal stakeholders and Development Management found that the Contaminated Land and Air Quality Development Management policies are functionally effectively. However, it was requested that an additional paragraph relating to human health is included in the reasoned justification to the Air Quality policy. **In reviewing and carrying forward Policy DM10, the Coal Authority requests consideration of the potential risks posed by past coal mining activity.**

## Open Space

(Policy DM3)

8.11.12 The LDP includes one policy (DM3) in relation to public open space. The policy requires the protection of existing public open spaces and includes a requirement for the provision of new open spaces on planning applications for new housing proposals for ten dwellings or more. Public open spaces are identified in the Open Space Assessment (OSA) (updated 2018). The Assessment also identifies deficiencies, so when open space needs to be provided as part of a development proposal it provides the type of most community benefit. The OSA will be updated as part of the LDP review.

8.11.13 AMR 2021, AMR 2020 and the Monitoring Review all found issues with the implementation of this policy, both for the securing of new open spaces on sites of ten or more dwellings and with the protection of existing open spaces. This policy will be reviewed with Development Management Officers input to improve its clarity in the Replacement LDP. Consideration will also be given to displaying public open spaces safeguarded through LDP policy on the proposals map.

8.11.14 The Replacement LDP will need to consider how LDP policies that relate to the protection and securing of new public open spaces integrate with Green Infrastructure policies which not only relate to the open space topic area, but biodiversity and geodiversity, flooding, landscape and placemaking as well.

## Landscape

(Policies SP7, DM4)

8.11.15 LDP Policy SP7 includes the safeguarding of the valued characteristics and qualities of the landscape throughout Powys, whilst LDP Policy DM4 provides a comprehensive policy which all proposals in the Open Countryside should be assessed

against. The main evidence base supporting the landscape policies is LANDMAP - an all-Wales landscape resource.

8.11.16 The annual monitoring framework is restricted to looking at where major developments require a Landscape and Visual Impact Assessment (LVIA). With regards to this, AMR 2021, AMR 2020 and the Monitoring Review did not note any fundamental issues. However, it has been observed that the consideration of development proposals against LANDMAP tends to be undertaken by Planning Officers determining applications rather than agents/applicants using LANDMAP to inform the siting and design of their proposals.

8.11.7 To improve the effectiveness of the policy and to inform the Replacement LDP, the LPA is undertaking a Local Landscape Character Assessment (LLCA). The intention is that the LLCA will provide the basis to the revision of the landscape policy framework. Further consideration will also be given in terms of the cumulative impact of the growth of the tourism sector, referred to above, when reviewing the landscape policies.

## 8.12 Planning Obligations

(Policy DM1)

8.12.1 LDP Policy DM1 – Planning Obligations, seeks to ensure that new development is accompanied by an appropriate level of infrastructure, facilities, services and related works where they are necessary to make the development acceptable. Contributions are secured through the use of planning obligations, as set out in Section 106 of the Town and Country Planning Act 1990, or through the use of planning conditions. Planning obligations seek contributions from developers to enhance the quality of a development, provide community benefits and infrastructure, and mitigate any negative impacts that may arise as a consequence of the development.

8.12.2 LDP Policy DM1 is considered to be working effectively and contributions are being received (subject to viability considerations) to mitigate the impacts of new development and help provide necessary infrastructure such as recreation and open space, community and educational facilities. Consideration will need to be given to the most effective method of providing infrastructure to support development in the Replacement LDP, carry out appropriate infrastructure planning accordingly and take into consideration up-to-date viability evidence.

## 8.13 Welsh Language

(Policy DM12)

8.13.1 LDP Policy DM12 – Development in Welsh Speaking Strongholds seeks to ensure that developments in the designated Welsh Speaking Strongholds mitigate any negative impacts of the development on the Welsh language. Development proposals on large windfall sites are required to take measures to protect, promote and enhance the Welsh Language and Culture (through the use of Language Action Plans) when adverse impacts have been identified by a Welsh Language Impact Assessment.

8.13.2 An update to the LDP's Welsh Language Impact Assessment (WLIA) will be undertaken as a component of the LDP's Sustainability Appraisal as part of the LDP review. LDP Policy DM12 will be reconsidered to reflect the findings of the updated evidence.

## 8.14 Supplementary Planning Guidance (SPG)

8.14.1 A number of Supplementary Planning Guidance (SPG) documents to support key LDP policy areas (referred to above) have been approved by the Council since the adoption of the LDP. These are:

- Affordable Housing
- Biodiversity and Geodiversity
- Renewable Energy
- Landscape
- Planning Obligations
- Conservation Areas
- Residential Design
- Archaeology
- Historic Environment
- Newtown and Llanllwchaearn Place Plan

8.14.2 A review of the adopted SPG will be undertaken as part of the Replacement LDP process. The LPA will also identify the need for new SPG to support the policies of the Replacement LDP.

## 8.15 Proposals Map and Constraints Map

8.15.1 The form and content of the LDP Proposals Map will require changes as part of the LDP review to reflect any changes to the plan. Going forward it is anticipated the LDP will also include a web-based interactive Constraints Map.



## 9. Re-consideration of the SA, SEA and HRA

### 9.1 Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)

9.1.1 The Planning and Compulsory Purchase Act 2004 requires that the process of drawing up and developing an LDP is informed throughout by an iterative process of Sustainability Appraisal (SA). The SA also incorporates Strategic Environmental Assessment (SEA) required under European Directive 2001/42/EC. This is intended to ensure that policies in the LDP all promote 'sustainable development' through integrating economic, environmental, social and cultural objectives into the development of all aspects of the LDP.

9.1.2 The findings of the SA monitoring are summarised annually in the AMR to give an assessment of the impacts of the implementation of the LDP policies, and a summary of the main findings is set out in **Section 4** above.

9.1.3 The SA process, including SEA, will be integrated into the Replacement LDP preparation process and will follow the main stages as set out in DPM3, beginning with the scoping stage, which will produce a Scoping Report that will be subject to statutory consultation. This work will involve review of the current SA/SEA framework, including monitoring framework to take into account all broader contextual changes in terms of national policy and guidance, changes and updates to baseline information and other new approaches and information.

9.1.4 Consideration will also need to be given to using integrated assessment approach. This would integrate statutory and key elements, such as the Well-being of Future Generations Act (2015) requirements, Equalities Act, Welsh Language Impact Assessment (WLIA), Health Impact Assessment (HIA) and the Environment Act (Section 6) (where relevant) into a single Integrated Sustainability Appraisal (ISA).

### 9.2 Habitats Regulations Assessment (HRA)

9.2.1 The adopted Powys LDP was subject to a Habitats Regulations Assessment (HRA) to assess whether its implementation would have any impacts on any European sites of nature conservation importance (i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). This involved an extensive screening process relating to all LDP policies and proposals and a detailed assessment of likely impacts.

9.2.2 Further to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, SACs and SPAs in the UK no longer form part of the European Union's Natura 2000 ecological network. A National Site Network has been created in the UK, which includes SACs and SPAs. Ramsar sites (designated under the Ramsar Convention on Wetlands of International Importance) do not form part of the National Site Network and are not subject to the Habitats Regulations, however they are treated within the planning system in the same way as SACs and SPAs.

9.2.3 The Replacement LDP will again need to be subject to HRA, and this will require the HRA screening process and methodology to be reviewed and revisited and applied to

developing LDP proposals in an iterative process to ensure that the relevant legislation and regulations are complied with and any issues are fully addressed.

## 10. Opportunities for Collaborative Working

10.0.1 The Well-being and Future Generations Act (2015) requires public bodies to have regard to the five ways of working, which includes consideration of collaboration. In line with national planning guidance within Development Plans Manual (Edition 3) (DPM3), LPAs should consider all opportunities for joint working and collaboration on both plan preparation and the evidence base, or through joint working arrangements. This guidance goes on to explain that this will be particularly relevant for LDPs on similar preparation timescales and with strong geographical/functional linkages.

10.0.2 National guidance within DPM3 requires LPAs to explore and explain the opportunities to prepare Joint LDPs/Joint LDP Lites with neighbouring LPAs and increase cross-boundary working. This section looks at the opportunities for jointly preparing the Replacement LDP with other LPAs, other forms of collaborating working, and future working in terms of preparing the Strategic Development Plan (SDP) for the Mid Wales region followed by LDP Lites.

### 10.1 Joint LDPs

10.1.1 The Powys LDP area shares its administrative boundary with eight other Welsh Local Planning Authorities (LPA). **Table 8** summarises the current LDP position for each of the adjoining LPAs.

10.1.2 This information demonstrates that most of the adjacent LPAs are at different stages in the LDP process. Wrexham LPA's LDP is nearing adoption, whereas Snowdonia National Park Authority adopted its revised LDP in 2019. Neither are expected to be at the review stage for some time. In the case of Carmarthenshire LPA and Denbighshire LPA, both had reached deposit stage of their Replacement LDPs, however progress has been delayed due to the Covid-19 pandemic.

10.1.3 Neath Port Talbot LPA have already reviewed their LDP in 2020 and are now at the Delivery Agreement stage for the Replacement LDP. Gwynedd LPA's LDP (undertaken jointly with Anglesey) was adopted in July 2017 and is understood to be at the review stage of the LDP. Whilst these plans may be operating at a similar timescale to the Powys LDP, the geographical and functional linkages with these LPAs are limited to localised areas in the south-west (Ystradgynlais area) and north-west (north of Machynlleth) extremities of the Powys LDP area, with most of the north-west boundary of the plan area bordering the Snowdonia National Park. Therefore, it is not considered appropriate to progress with a Joint LDP at the plan level with these LPAs. The LPA will, however, consider working jointly with these LPAs on any cross-border issues or appropriate evidence in these areas.

10.1.4 Within the Mid Wales region, Brecon Beacons National Park Authority (BBNPA) and Ceredigion LPA had both reached the preferred strategy stage of their Replacement LDP process. However, in light of changing circumstances, including the Covid-19 pandemic and impact of phosphates in SAC catchments, BBNPA has temporarily paused the Replacement LDP process and Ceredigion has suspended the timetable for its Replacement LDP.

10.1.5 It should be noted that the legislation relating to the end date of LDPs does not apply to either of the BBNPA or Ceredigion LPA plans, whereas the legislation does apply to the Powys LDP. Therefore, according to the current position set out by Welsh Government, the

Powys LDP will cease to be the development plan for the plan area on 31 March 2026. This reinforces the need to progress with a Replacement LDP for the Powys LPA area in order to ensure that an adopted plan is in place before the current LDP expires.

10.1.6 Given the uncertainty around the Replacement LDPs for BBNPA and Ceredigion LPA, and taking into account the Powys LDP's end date, it is not considered appropriate to prepare a joint LDP with these LPAs. However, the LPA will consider other ways to collaborate with these LPAs, as part of the Replacement LDP process and in preparing an SDP for the Mid Wales region, as explained in section 10.3 below.

## 10.2 Collaborative working

10.2.1 The LPA recognises the benefits of collaboration and joint working in terms of addressing cross-boundary issues and developing evidence on a consistent basis. The LPA has, over recent years, collaborated with other authorities as part of the Mid and South-West Wales Strategic Planning Group on certain evidence, including the following:

### Regional Housing Market Assessment

10.2.2 LPAs and Local Housing Authorities within the Mid and South-West Wales region collaborated on updating their Local Housing Market Assessments (LHMA) with the aim of ensuring a consistent methodological approach to assess housing needs across the region. Opinion Research Services were commissioned to undertake the assessment, which was completed in October 2020, and has produced reports at a regional and local level. The results within the report for Powys are based on the 2014-based household projections. However, Welsh Government have since released updated (2018-based) population and household projections, and is also developing a new methodology, model and guidance for LHMA's, which will be expected to be used by LPAs to inform their LDPs.

### Regional Viability Study

10.2.3 A Financial Viability Project was jointly commissioned by the Mid and South-West Wales region and undertaken by Andrew Burrows of Burrows Hutchinson Ltd. This commission has produced a High Level Viability Model (HLVM) to enable viability testing of proposed LDP policies and affordable housing targets, and as evidence to support delivery of the LDP. It has also been used by the LPA to monitor changes to viability since the LDP was adopted, as part of the Annual Monitoring Report. A Development Viability Model (DVM) has also been produced, which is intended to be used at the Replacement LDP's candidate site stage and is also being used in connection with viability challenges at the planning application stage.

### Regional Employment Study

10.2.4 As part of the Mid Wales Growth Deal, a regional Employment Sites and Premises study has been commissioned from a consortium of BE Group, Hatch and Per Consulting. This three-part study assesses need and opportunities across the Mid Wales Region (Powys, Ceredigion and BBNPA), identifies strategic sites and considers interventions to

support inward investment, to grow existing enterprises and ensure there is an appropriate portfolio of commercial premises to meet employment needs, as well as identify strategic interventions to overcome issues of negative viability,

10.2.5. This joint study will provide an evidence base for the regional economy, and further work will be undertaken to enable evidence to be developed to support the local economy and employment needs.

### Future working

10.2.6 Powys LPA sits within the region of Mid Wales, as identified within Future Wales, which also includes Ceredigion LPA and the part of the Brecon Beacons National Park Authority area lying within the Powys Unitary Authority area. Both of these authorities were also members of the Mid and South-West Wales region. 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 LPA is already supporting and contributing towards regional planning within the Mid Wales Strategic Planning Group. It is anticipated that there be further opportunities to undertake certain evidence on a joint basis and ensure consistency in approach to aid with future policy development at a regional level. Further work may be undertaken jointly with other LPAs and/or regionally on issues such as phosphates and potential mitigation.

## 10.3 Strategic Development Plan

10.3.1 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 SDP regulations published in March 2021 will come into force in February 2022 and set out the procedure for preparing SDPs. The regulations also established Corporate Joint Committees (CJCs) for each region, who will be responsible for preparing an SDP for the region. SDPs, once adopted, are intended to be followed by either LDP Lites or Joint LDP Lites prepared by LPAs.

10.3.2 Future Wales requires SDPs within each of the four regions identified by Future Wales, which includes the Mid Wales region. Future Wales expects local authorities and national parks to formally work together as this is the best way for regions to meet the strategic challenges and opportunities they face and provide a strong framework for LDPs.

10.3.3 Future Wales sets out the following specific policies for the Mid Wales region, with strategic spatial elements illustrated in **Figure 6**:

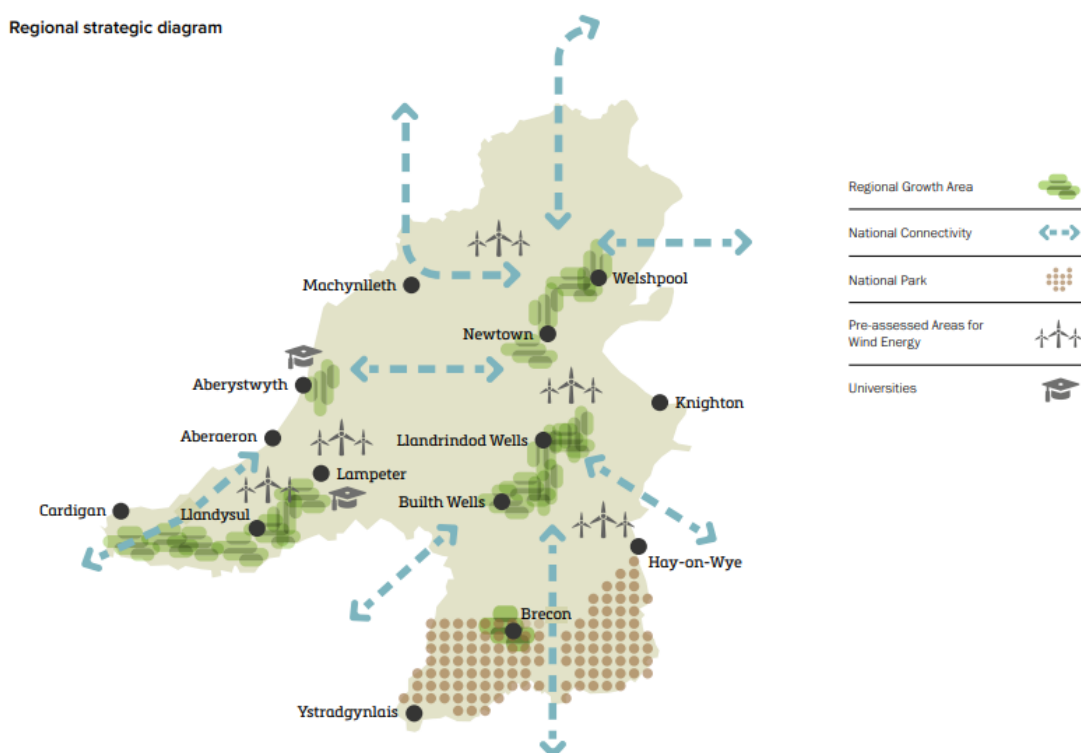
- **Policy 25** identifies the Teifi Valley, Brecon and the Border, The Heart of Wales, Bro Hafren and Aberystwyth as Regional Growth Areas where sustainable growth and development is supported to meet the regional housing, employment and social needs of Mid Wales.
- **Policy 26** supports the growth and development of existing and new economic opportunities across the region based on traditional rural enterprises and modern, innovative and emerging technologies and sectors.

- **Policy 27** supports improved transport links within the region and with other regions and England, planning for growth and regeneration to maximise opportunities arising from better regional connectivity.

10.3.2 The LPA recognises the importance of developing an SDP for regional planning purposes. However, the SDP is not considered to offer a realistic alternative to the replacement of the current Powys LDP, as the SDP may not be adopted for some time and the current Powys LDP will expire in March 2026. The LPA intends to continue with the process of preparing a Replacement LDP in order to avoid the risk of a policy vacuum after the adopted Powys LDP expires, which would undermine the principle of a plan-led system and local decision-making.

10.3.3 During the process of preparing a Replacement LDP, the LPA will closely consider the implications of the emerging SDP for the Powys LDP, whilst also looking at how the LDP's evidence can be used to inform the SDP. The scope for preparing a joint LDP Lite will be determined in collaboration with the other LPAs in the Mid Wales region following adoption of the SDP for Mid Wales.

**Figure 6. Strategic Diagram for the Mid Wales Region (Future Wales)**



Source: Future Wales (February 2021) Welsh Government

**Table 8. LDP position of adjoining LPAs**

| Local Planning Authority          | LDP adoption date                | Plan period | Date and conclusion of Review Report  | LDP2 Plan Period | Progress with LDP2   |
|-----------------------------------|----------------------------------|-------------|---------------------------------------|------------------|--|
| Brecon Beacons National Park      | 2013                             | 2007-2022   | 2018 Full Revision                    | 2018-2033        | Consultation on Preferred Strategy July to August 2019. Intended to revisit the Preferred Strategy and revise the Delivery Agreement, however preparation of the Replacement LDP was paused in 2021 due to the impact of the Covid-19 pandemic and impact of phosphates on SAC catchments. |
| Neath Port Talbot                 | 2016                             | 2011-2026   | 2020 Full Revision                    | 2020-2035        | Consultation on Draft Delivery Agreement and Draft ISA Scoping Report ended in September 2021.   |
| Carmarthenshire                   | 2014                             | 2006-2021   | 2018 Full Revision                    | 2018-2033        | Deposit Plan consultation closed October 2020. Revised Delivery Agreement agreed by Welsh Government in November 2020.   |
| Ceredigion                        | 2013                             | 2007-2022   | 2017 Full Revision                    | 2018-2033        | Consultation on Preferred Strategy June to September 2019. Replacement LDP process paused in 2021 due to the Covid-19 pandemic and the impact of phosphates on SAC catchments, in order to allow essential evidence and data to be gathered and mitigation options to be devised.          |
| Snowdonia National Park           | 2011                             | 2007-2022   | 2016 Short Form Revision              | 2016-2031        | Revised LDP adopted February 2019.   |
| Gwynedd (joint LDP with Anglesey) | 2017                             | 2011-2025   | Consultation Draft Review Report 2021 | N/A              | N/A  |
| Denbighshire                      | 2013                             | 2006-2021   | 2017 Full Revision                    | 2018-2033        | Replacement LDP was due to reach deposit stage, however delayed due to the Covid-19 pandemic. Revised timetable to be set out in an amended Delivery Agreement and consulted upon.   |
| Wrexham                           | At Examination (not yet adopted) | 2013-2028   | N/A                                   | N/A              | N/A  |

## 11. Conclusions

11.1 The LPA's Review Report should conclude on the type of procedure to be followed for revising the LDP. Based on the LPA's review of the LDP, it is considered concluded that the Full Revision procedure would be is the most appropriate form of revision for the adopted Powys LDP, which would. This means that a Replacement LDP would 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. Public consultation on been supported by public consultation.

11.2 The evidence within Annual Monitoring Report (2021) has identified fundamental issues with the delivery of the LDP's housing-led strategy that would need to be addressed within a Replacement LDP. The current Growth Strategy of the adopted Powys LDP will need to be reconsidered to reflect the future needs of the Plan area. The distribution of that growth across the LDP area, through the Spatial Strategy, will, therefore, also need to be reconsidered. Changes will also be needed to the detailed policies and proposals of the LDP to reflect the re-consideration of the strategy and to reflect updated national policy and guidance and relevant evidence.

11.3 Significant changes have occurred in the planning policy context since the LDP was adopted in 2018, particularly at a national level with the publication of Future Wales and updated editions of Planning Policy Wales (PPW). The LDP will need to be revised to reflect:

- the emphasis within these documents on the principles of placemaking and sustainable development, including the National Sustainable Placemaking Outcomes.
- the emphasis within these documents on the well-being goals and applying the five ways of working, established by the Well-being of Future Generations Act, in order to demonstrate that the LPA has carried out its sustainable development duty.

11.4 The LPA must also meet other duties and responsibilities, including those relating to the environment and climate change. The policy approach at a local level also needs to be reconsidered in order to respond to the issues raised by the Covid-19 pandemic, the impact of phosphates on SAC catchments, and changing national and local priorities and strategies.

11.5 By updating existing evidence and undertaking new evidence, in line with national planning policy guidance, this will ensure an up to date and robust evidence base to inform the strategy, policies and proposals of the Replacement LDP. Evidence already available around changes to population and household projections, along with other factors detailed within this Review Report, highlight a fundamental need to reconsider the housing requirement and Growth Strategy of the LDP, taking into account also the forthcoming data that will become available from Census 2021.

11.6 The findings and conclusions of the LDP's review have been informed by public consultation. Appendix D summarises the comments received, along with the Council's responses. The comments received generally supported the need for a Full Revision of the adopted Powys LDP.

11.6 11.7 To conclude, it is considered that a Full Revision is required in order that the strategic issues identified with the implementation of the adopted Powys LDP can be addressed. The significance of the changes to the context within which the LDP operates



also justifies the need for the Plan to be revised as a whole in order to respond to these changes. The use of the Short Form Revision procedure would not be appropriate or justified in these circumstances. The Full Revision of the LDP, through the preparation of a Replacement LDP, will ensure that the Powys LDP area has an up-to-date Plan beyond 2026, which reflects the plan-led approach in Wales.

## APPENDIX A Summary table of SA Monitoring Findings

**Table 9. SA Monitoring Findings – Biodiversity**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>   | <b>Summary of findings since LDP adoption (April 2018)</b>   | <b>Overall trend/impact on SEA objective</b>   |
|----------------------|---|--|--|
| <b>1</b>             | Increase/decrease in the number of European designated sites in favourable condition  | In 2018, only 11, or 6%, of the 180 Conservation features found in the 47 European Sites in or close to Powys, had been reassessed by NRW, with a net deterioration in their overall status due to just one feature having been found to have deteriorated, and this in the first months of the LDP.   | Negative impact upon SEA Objective 1 to protect designated sites at initial stages of the adopted Powys LDP. Updated data not available at time of annual monitoring - NRW baseline assessment data 2020 will be captured in next AMR. |
| <b>2</b>             | Changes in the status of the habitats and species identified in the Local Biodiversity Action Plan (LBAP)   | The LBAP review, which will result in a Nature Recovery Action Plan for Powys, is still underway so it has not been possible to determine what changes have occurred in their status during the first three years of the LDP.  | Updated data not available.  |
| <b>3</b>             | 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 | 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. | No longer requires monitoring due to change in national approach towards enhancement.  |

**Table 10. SA Monitoring Findings – Population and Human Health**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>                                | <b>Summary of findings since LDP adoption (April 2018)</b>   | <b>Overall trend/impact on SEA objective</b>  |
|----------------------|--|--|---|
| <b>4</b>             | Change in average life expectancy                              | The most recent data for this indicator was published in 2016 so it has not been possible to evidence any changes in life expectancy over the first three years of the LDP.  | Updated data not available.   |
| <b>5</b>             | Ratio of working age population to children and retired people | Based on the mid-year population estimates released by the Welsh Government annually, since 2018 the percentage of the population of Powys who are of non-working age has increased by 0.5%, and in 2020 stood at 43.5%, with 56.5% of population of working age. This means there are more non-working people in the county than there were in 2018. Within the non-working population, the number of children has fallen over this time by 129, but the number of retired people has risen by 1,026. | 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. |
| <b>6</b>             | Percentage of population aged 75 and over                      | Based on the mid-year population estimates released by the Welsh Government annually, this has risen by 911 to 17,077 since 2018, which in terms of the percentage of the population equates to an increase of 0.63%. In 2020, this age group represented 12.83% of the overall population of Powys, which represents an increase in percentage terms of 0.63% since 2018.   | Continuation of trend relevant to SEA objective 3 as above as above.  |
| <b>7</b>             | Migration trends of younger adults (aged 20-34)                | Whilst there are some more complex trends within the mid-year estimates data, regarding different age groups and gender breakdowns, overall there has been a net inflow of people within this age group of 162 people over the three years.  | Potential reversal of trend relevant to SEA Objective 3 particularly in terms of the need to retain the young working age population.   |
| <b>8</b>             | The number of police recorded road                             | The figures for those who were slightly injured, seriously injured and for deaths had remained fairly constant. The number of deaths had increased from 9 in 2019 to 14 in   | Longer term monitoring needed to identify any trends post-covid and impacts in  |

|    |  |   |  |
|----|--|---|--|
|    | accidents involving personal injury  | 2020, compared to the ten-year average of 12. The pandemic then saw a dramatic reduction in all of the figures, presumably due to the drastic reductions in road use during the lockdowns.  | relation to SEA objective 5 to promote improvement in community safety.  |
| 9  | Number of police recorded crimes   | These figures, taken over the three years reveal an increase of 846 crimes. In 2020, a reduction of 53 crimes from the previous 2019 years figures occurred. Prior to the pandemic there had been a long-term increase in numbers of recorded crimes. | Longer term monitoring needed to identify any trends post-covid and impacts in relation to SEA objective 5 to promote improvement in community safety. |
| 10 | Percentage of people participating in sporting activities three or more times a week | Figures from the National Survey for Wales have not been updated in the three years of monitoring so no trend can be identified.  | Updated data not available.  |
| 11 | Number of planning applications referred to the Health and Safety Executive          | Over the three year period since adoption a total of 7 planning applications were referred to the Health & Safety Executive who raised no concerns.   | Positive impact in relation to SEA objective 6 to prevent or minimise risk to human health.  |

**Table 11. SA Monitoring Findings – Soil**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>  | <b>Summary of findings since LDP adoption (April 2018)</b>   | <b>Overall trend/impact on SEA objective</b>  |
|----------------------|--|--|---|
| 12                   | Amount (ha) of development permitted on thick peat areas (mapped by the British Geological Survey) | One development permitted situated over a mapped area of thick peat (involving 0.16 ha) was permitted and where the impact on the area of thick peat had not been considered. Other developments over thick peat deposits had been permitted prior to the LDP or since any deposits had been removed by historic applications. | Negative impact in relation to SEA objective 7 to protect soils that are classified as being important for carbon storage.                      |
| 13                   | Amount (ha) of development permitted on greenfield land outside development boundaries             | The percentage of land subjected to planning permission, that is on greenfield land and outside of development boundaries amounted to 70% in 2019, 67% in 2020 and 50% in 2021. These results are reflective of the rural nature of Powys and the development types proposed in these areas, including tourism. The            | Longer term monitoring required to establish whether the trend towards more of a balance between the development and use of greenfield land and |

|    |  |   |   |
|----|--|---|---|
|    |  | developments permitted accord with national guidance and the LDP's strategy and policies.   | previously developed land continues.  |
| 14 | Number of developments where a Verification Report has been approved by the LPA demonstrating the remediation of contaminated land | In the three years monitored to date a total of 35 applications have been submitted and approved, where a verification report was required by condition, which indicates that remediation is being supported as part of new development. Some inconsistency noted in respect of 3 of the applications in terms of the level of evidence or detail submitted/considered. | General positive impact in relation to SEA objective 8 to prevent contamination of land and support remediation as part of new development, however some inconsistency noted. |

**Table 12. SA Monitoring Findings – Water**

| Indicator no. | SEA Monitoring Indicator   | Summary of findings since LDP adoption (April 2018)   | Overall trend/impact on SEA objective   |
|---------------|--|---|---|
| 15            | River Basin Management Plan Area for Western Wales<br><br>River Basin Management Plan and Severn River Basin Management Plan<br><br>% of surface waters are at 'good' status<br><br>% of groundwater bodies at 'good' status | These water types have only been assessed once (in 2019) during the three years of this monitoring period, when 45.2% of surface waters and 41.17% of groundwaters were assessed as being 'good'. This suggests that water quality is being maintained in line with SEA objective 9, however this objective also includes improvement to water quality. No updated data available to establish any trend or change. | Longer term monitoring to required to analyse any changes or trends.  |
| 16            | Number of planning permissions that incorporate sustainable drainage systems (SuDS)  | Since January 2019, the SuDS Approving Body (SAB) approval process has come into force, which places mandatory standards in terms of sustainable drainage for all developments of more than one dwelling or bigger than 100m <sup>2</sup> , hence this indicator is no longer relevant.   | No longer requires monitoring due to separate process created requiring development to meet sustainable drainage standards. |

**Table 13. SA Monitoring Findings – Air**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>  | <b>Summary of findings since LDP adoption (April 2018)</b>  | <b>Overall trend/impact on SEA objective</b>  |
|----------------------|--|---|---|
| <b>17</b>            | Levels of average NO <sub>2</sub> , PM <sub>2.5</sub> and PM <sub>10</sub> concentrations (recorded as Air Quality Exposure Indicators) across Powys | These figures reveal a stable trend for NO <sub>2</sub> which remains at concentrations of 4 µg/M <sup>3</sup> , whereas airborne particulates of both sizes have increased slightly over the three monitoring years. The most recent figures available in AMR 2021 monitoring period are based on 2019, and therefore longer term monitoring is required to capture changes since LDP adoption.  | Longer term monitoring required to analyse any changes or trends.   |
| <b>18</b>            | Specific levels of NO <sub>2</sub> against National Air Quality Strategy Objectives across Powys   | This looks at levels of NO <sub>2</sub> specifically, using non-automatic monitoring sites in Newtown, the site of the now revoked Air Quality Management Area (AQMA). These sites all show clear reductions in the levels recorded in the most recent year for which figures are available, 2019, when compared to previous years, which demonstrates the role that the Newtown bypass has played in improving air quality at this site. | Positive impact in relation to SEA objective 10 to protect and improve air quality in Powys and in particular the Newtown AQMA. |

**Table 14. SA Monitoring Findings – Climatic Factors**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>  | <b>Summary of findings since LDP adoption (April 2018)</b>   | <b>Overall trend/impact on SEA objective</b>                  |
|----------------------|--|--|---|
| <b>19</b>            | Number of properties (homes and businesses) at medium or high risk of flooding from rivers and the sea | Monitors the numbers of homes and businesses at medium to high risk of flooding in the county. There are 4,294 properties now at risk of flooding, which represents an increase of 30 since the adoption of the LDP. However, this does not necessarily mean that there is a negative impact as it captures some areas | No clear impact on the SEA objective 11 to reduce flood risk. |

|           |                               |   |  |
|-----------|-------------------------------|---|--|
|           |                               | within zone C1 where flood defences are present. No issues have been identified with the implementation of the corresponding LDP Policy DM5 as part of AMR 2021.  |  |
| <b>20</b> | Emissions of greenhouse gases | The results for Powys are positive across almost all sectors each year, including Domestic, Transport and Land Use and Land Use Changes and Forestry, with an overall reduction, across all sectors taken together, of 1.19% between 2018 and 2019. This continues the long-term trend seen before the LDP was adopted. | Continuation of trend relevant to SEA Objective 12 in relation to reducing greenhouse gas emissions. |

**Table 15. SA Monitoring Findings – Strategic Resources and Assets**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>  | <b>Summary of findings since LDP adoption (April 2018)</b>  | <b>Overall trend/impact on SEA objective</b>  |
|----------------------|--|---|---|
| <b>21</b>            | Number of existing mineral sites   | The number of potentially active mineral sites in the county remains at 15, with no change in this number since before LDP Adoption.  | Neutral impact on SEA objective 13 in terms of protecting mineral resources.                                      |
| <b>22</b>            | Number of developments permitted for permanent development on safeguarded mineral resource sites.    | This indicator has revealed inconsistencies in the way Policy DM8 is being applied in each year of monitoring, highlighting the need for further training, research and re-consideration of the policy.                                 | Negative impact on SEA objective 13 to protect mineral resources from development that would preclude extraction. |
| <b>23</b>            | Number of planning applications for development that would affect strategic transport infrastructure | This indicator involved monitoring the performance of policy T3 in relation to the safeguarding and protection of the route of the Newtown Bypass. This indicator is no longer relevant as the bypass was completed and opened in 2019. | No longer requires monitoring due to completion of the Newtown bypass.  |

|           |  |  |  |
|-----------|--|--|--|
|           | referred onto the Welsh Government   |  |  |
| <b>24</b> | Number of developments permitted on or affecting the Sennybridge (Ministry of Defence) Training Area | This indicator monitors the safeguarding of the Sennybridge Training Area through the use of Policy SP7. During the life of the LDP to date there have been no planning applications within the Training Area with which to test the performance of the Policy so there is no conclusion to be drawn from the indicator. | Neutral impact on SEA objective 14 to protect specific infrastructure from incompatible development. |

**Table 16. SA Monitoring Findings – Cultural Heritage**

| <b>Indicator no.</b> | <b>SEA Monitoring Indicator</b>   | <b>Summary of findings since LDP adoption (April 2018)</b>  | <b>Overall trend/impact on SEA objective</b>   |
|----------------------|---|---|--|
| <b>25</b>            | Net gain or loss of historic environment designations – Listed Buildings, Scheduled Ancient Monuments, Conservation Areas, Registered Historic Parks and Gardens and Registered Historic Landscapes | Since the adoption of the LDP there has been a net increase of four Listed Buildings and two Scheduled Monuments. The number of new listings/schedulings has therefore exceeded the number of de-listings/de-schedulings. There has been no change in the numbers of Conservation Areas (55), Registered Historic Parks and Gardens (37), or Registered Historic Landscapes (10). | Positive impact on SEA objective 16 to understand, value, protect and enhance Powys' historic environment. |
| <b>26</b>            | Percentage of scheduled monuments in Wales that are in  | Of the Scheduled Monuments assessed by Cadw as part of their Monuments at Risk Survey, 69% were assessed as being in a stable or improving condition.   | Updated data not available.  |



|           |  |  |  |
|-----------|--|--|--|
|           | stable or improving condition.   | No updated information has not been received from Cadw and therefore it is not possible to identify any changes or trends since the LDP was adopted.   |  |
| <b>27</b> | Percentage of listed buildings that are neither 'vulnerable' nor 'at risk' | According to Cadw's register of Buildings at Risk (2015) 82% of listed buildings in the Powys LDP area were neither vulnerable or at risk. No further survey work has been undertaken by Cadw, as inspections have been limited by covid restrictions, and therefore it is not possible to identify any changes or trends since the LDP was adopted.                         | Updated data not available.  |
| <b>28</b> | Number, percentage and distribution of Welsh Speakers                      | This indicator uses data from the most recent Census. As a result, it will be 2022 before the data from the most recent Census is published, to enable any update of the baseline data (from the 2011 Census), and therefore it is not possible to identify any changes or trends since the LDP was adopted.   | Updated data not available.  |
| <b>29</b> | Changes in the Welsh language skills of the population                     | This indicator monitors changes in the Welsh language skills of the population using data from the most recent Census. As a result, it will be 2022 before the data from the most recent Census is published, to enable any update of the baseline data (from the 2011 Census) and therefore it is not possible to identify any changes or trends since the LDP was adopted. | Updated data not available.  |
| <b>30</b> | Percentage of the population aged 3 and over who say they can speak Welsh  | The data from the Annual Population Survey shows that the percentage of the population of Powys who can speak Welsh had initially continued the upward trend following adoption of the LDP, with the percentage increasing from 28.9% in 2018 to 29.9% in 2019, however thereafter the percentage has fallen to 27.3% in 2020 and subsequently to 24% in 2021.               | Potential negative trend, however going forward Census 2021 data will help to confirm any emerging trends. |

**Table 17. SA Monitoring Findings – Landscape**

| Indicator no. | SEA Monitoring Indicator   | Summary of findings since LDP adoption (April 2018)   | Overall trend/impact on SEA objective                      |
|---------------|--|---|--|
| 31            | Area (ha) / proportion of development permitted that falls outside of development boundaries and is within LANDMAP aspect areas classified as outstanding / high quality | This indicator has some issues regarding its usefulness due to the very high percentage of the county (97%) that is classified as either outstanding or high quality. This means that almost any development outside a development boundary will fall into such an area. Notwithstanding this, there has been no clear trend emerging from the data since adoption, with 241Ha in the first year, 164Ha in the second and 507Ha in the most recent. Furthermore, the monitoring of LDP Policy DM4, which refers to LANDMAP, has not identified any particular issues. | No apparent trend. Re-consider efficacy of this indicator. |
| 32            | Proportion of outstanding / high quality aspect areas identified in LANDMAP  | There has been no reassessment by NRW of the aspect areas since LDP adoption and since then the assessment interval has changed from annually to every five years.  | Updated data not available.                                |

**Table 18. SA Monitoring Findings – Geodiversity**

| Indicator no. | SEA Monitoring Indicator  | Summary of findings since LDP adoption (April 2018)  | Overall trend/impact on SEA objective   |
|---------------|---|--|---|
| 33            | Number of Regionally Important Geodiversity Sites (RIGS) and Geological | Results over the three years since adoption show some variation in the numbers of RIGS which is due to the difficulty in accessing authoritative data consistently. It is understood that the latest figure for RIGS is the most authoritative. The data for GCRs shows more continuity. Overall, therefore it is difficult to identify or | No apparent trend, however improvements to data will enable more accurate monitoring in future. |

|           |  |   |  |
|-----------|--|---|--|
|           | Conservation Review (GCR) sites                                    | draw any conclusions about trends, however the latest data will at least represent a baseline going forward.  |  |
| <b>34</b> | Number of developments permitted on or affecting RIGS or GCR sites | Monitors the performance of LDP Policy DM2 with respect to the protection afforded to the RIGS and GCRs in the LDP area. In each of the three years that monitoring has taken place there have been issues concerning how these particular designations are being taken into consideration in determining applications. Improvements to mapping will help to rectify these issues, along with training. | Negative impact on SEA objective 18 to protect RIGS from incompatible development. |

## APPENDIX B Summary tables of the LDP Policy Review

**Table 19. Strategic Policies**

| Policy Reference | Title  | Overview  |
|------------------|--|---|
| SP1              | Housing Growth   | Revise policy to reflect reconsideration of spatial and growth strategy.  |
| SP2              | Employment Growth                                      | Revise policy to reflect reconsideration of spatial and growth strategy and to reflect emerging Mid Wales regional strategic employment site evidence.  |
| SP3              | Affordable Housing Target                              | Revise policy to reflect reconsideration of the strategy and updated evidence of housing need within national and regional estimates and the Local Housing Market Assessment, alongside updated viability evidence. New policy approach of identifying affordable housing-led sites to be considered. |
| SP4              | Retail Growth  | Revise policy to reflect updated evidence and to reconsider the appropriateness of the retail allocation under Policy R2 (which appears at risk of non-delivery).   |
| SP5              | Settlement Hierarchy                                   | Revise policy to reflect reconsideration of spatial and growth strategy.  |
| SP6              | Distribution of Growth across the Settlement Hierarchy | Revise policy to reflect reconsideration of spatial and growth strategy.  |
| SP7              | Safeguarding of Strategic Resources and Assets         | This policy is functioning effectively. It will be reviewed to ensure it remains up to date and that the listed strategic resources and assets remain relevant.   |

**Table 20. Development Management Policies**

| Policy Reference | Title                                       | Overview  |
|------------------|---|---|
| DM1              | Planning Obligations                        | This policy is functioning effectively.   |
| DM2              | Natural Environment                         | Reconsider policy to reflect change from European Sites to National Site Network, changes to the national legislative and policy objectives, and in the context of Green Infrastructure Assessment. |
| DM3              | Public Open Space                           | Reconsider policy with Development Management input to provide clarity, together with Green Infrastructure requirements.  |
| DM4              | Landscape                                   | Revise the policy in order to reflect evidence within the Local Landscape Character Assessment and national planning policy/guidance.   |
| DM5              | Development and Flood Risk                  | Reconsider policy in light of new TAN 15 and Flood Map for Planning.  |
| DM6              | Flood Prevention Measures and Land Drainage | Reconsider policy in light of new TAN 15 and Flood Map for Planning, along with SuDS requirements.  |

|             |  |  |
|-------------|--|--|
| <b>DM7</b>  | Dark Skies and External Lighting                         | This policy is being used mainly in support of planning conditions relating to external lighting schemes to avoid impact on nocturnal wildlife, rather than to assess the impact on light pollution and visibility of the night sky. Reconsider policy in light of national planning policy/guidance and related evidence. |
| <b>DM8</b>  | Minerals Safeguarding                                    | This policy supports requirements in national planning policy/guidance but is not being used consistently. Further officer training and constraints mapping will assist, together with revised wording   |
| <b>DM9</b>  | Existing Mineral Workings                                | This policy is functioning effectively, however additional wording to be added to reflect updated national policies and guidance.  |
| <b>DM10</b> | Contaminated and Unstable Land                           | This policy is functioning effectively.  |
| <b>DM11</b> | Protection of Existing Community Facilities and Services | Reconsider policy to clarify its application, and its relationship with other related policies (e.g. policies R3 and C1).  |
| <b>DM12</b> | Development in Welsh Speaking Strongholds                | Reconsider policy in light of updated evidence alongside the Welsh Language Impact Assessment to be undertaken as part of the LDP's Sustainability Appraisal.  |
| <b>DM13</b> | Design and Resources                                     | Reconsider policy and elements within it in light of national planning policy/guidance, particularly in respect of sustainability and placemaking principles.  |
| <b>DM14</b> | Air Quality Management                                   | This policy is functioning effectively, however additional wording to be added.  |
| <b>DM15</b> | Waste Within Developments                                | This policy is not being applied as widely as intended. This will be addressed through discussion with Development Management.   |
| <b>DM16</b> | Protection of Existing Employment Sites                  | This policy is functioning effectively, however the wording will be reviewed to ensure clarity and consistency with the suite of Employment Policies. See also Policy E4.  |

**Table 21. Topic Based Policies**

| <b>Policy Reference</b> | <b>Title</b>   | <b>Overview</b>  |
|-------------------------|--|--|
| <b>E1</b>               | Employment Proposals on Allocated Employment Sites     | This policy is functioning effectively. It will need to be re-assessed in the light of any revisions to the Growth and Spatial Strategy. The wording will be reviewed to ensure clarity and consistency with the suite of Employment Policies. |
| <b>E2</b>               | Employment Proposals on Non-allocated Employment Sites | This policy is functioning effectively. It will need to be re-assessed in the light of any revisions to the Growth and Spatial Strategy. The wording will be reviewed to ensure clarity and consistency with the suite of Employment Policies. |
| <b>E3</b>               | Employment Proposals on Allocated Mixed                | This policy is functioning effectively. It will need to be re-assessed in the light of any revisions to the Growth and Spatial Strategy. The wording will be reviewed to   |

|           |  |   |
|-----------|--|---|
|           | Use Employment Sites                             | ensure clarity and consistency with the suite of Employment Policies.   |
| <b>E4</b> | Safeguarded Employment Sites                     | This policy is functioning effectively. It will be subject to updating to ensure the list of safeguarded sites is current and correct and that the policy remains compliant with national policy and updated evidence. See also Policy DM16.  |
| <b>E5</b> | Bronllys Health Park                             | Reconsideration of policy required in light of issues identified in its application, as well as the need to review its relevance going forward.   |
| <b>E6</b> | Farm Diversification                             | Reconsideration of policy to consider diversification within agriculture alongside diversification away from agriculture, alongside any changes in national policy.   |
| <b>E7</b> | Home Working                                     | The policy is expected to continue to be supportive and flexible to home working, the wording will be reviewed and updated as necessary including with reference to the change in working practices post-Covid-19.  |
| <b>T1</b> | Travel, Traffic and Transport Infrastructure     | Reconsider policy following emphasis in PPW and Future Wales on sustainable travel.   |
| <b>T2</b> | Safeguarding of Disused Transport Infrastructure | Policy not used. Research should be undertaken to identify the disused railways and disused or unused rail sidings and other transport infrastructure, in the Plan area, as part of the review process. This research will enable an understanding of the policy approach to be taken going forward and may lead to the identification of Green Infrastructure opportunities. |
| <b>T3</b> | Newtown By-pass                                  | Policy no longer required. The Newtown Bypass has been constructed and is operational.  |
| <b>H1</b> | Housing Development Proposals                    | Revise policy to reflect reconsideration of spatial and growth strategy.  |
| <b>H2</b> | Housing Sites                                    | Revise policy to reflect reconsideration of spatial and growth strategy.  |
| <b>H3</b> | Housing Delivery                                 | This policy is functioning effectively; however it will be reconsidered to reflect any changes in approach towards housing delivery and addressing housing need.  |
| <b>H4</b> | Housing Density                                  | Reconsider policy in light of national planning policy/guidance and further research to inform the approach towards housing density across settlement tiers and development types.  |
| <b>H5</b> | Affordable Housing Contributions                 | Reconsider policy, including site specific targets, in light of updated evidence of housing need and viability, along with national planning policy/guidance.   |
| <b>H6</b> | Affordable Housing Exception Sites               | Reconsider policy in light of national planning policy/guidance. Revisions to the strategy, RSL/SHA programmes, and evidence of affordability and local need, will need to be reflected in the approach towards exception sites.  |
| <b>H7</b> | Householder Development                          | Policy is generally considered to be working effectively, particularly in respect of ancillary  |

|            |  |   |
|------------|--|---|
|            |  | development. Additional wording may be required to reflect further considerations.  |
| <b>H8</b>  | Renovation of Abandoned Dwellings                | This policy is being used effectively alongside TAN 24 guidance to ensure sympathetic renovation of abandoned dwellings and archaeological assessment or building recording.  |
| <b>H9</b>  | Replacement Dwellings                            | Issues identified with the interpretation of this policy, particularly around identifying and assessing buildings of local vernacular character. Further policy clarification may be needed to reflect archaeological assessment requirements.  |
| <b>H10</b> | Gypsy and Traveller Sites and Caravans           | The policy is expected to continue to be supportive and flexible to the provision of sites where required. The wording will be reviewed to ensure it remains up to date and relevant to current policy requirements and arising needs.  |
| <b>H11</b> | Gypsy and Traveller Site Provision               | Current policy will become outdated as needs are met. A new policy will be necessary to reflect updated evidence.   |
| <b>R1</b>  | New Retail Development                           | Review Policy in line with findings from updated Retail Study.  |
| <b>R2</b>  | Retail Allocations                               | Review Policy following findings from the Annual Monitoring Reports.  |
| <b>R3</b>  | Development Within Town Centres                  | Review Policy to clarify its application, and its relationship with other related policies, also in light of Covid -19 recovery and the impact upon the high street. The Retail hierarchy and shopping frontages will be reviewed in alignment with the revised spatial strategy and updated evidence.          |
| <b>R4</b>  | Neighbourhood and Village Shops and Services     | Reconsider policy so that it continues to be supportive, up to date and relevant to sustainable place-making in line with the reconsideration of the growth and spatial strategy. Links to Policies C1 and DM11 should be further explored to ensure a cohesive approach to supporting sustainable communities. |
| <b>TD1</b> | Tourism Development                              | Review Policy following findings from the Annual Monitoring Reports. Revision to wording also required to provide clarity.  |
| <b>TD2</b> | Alternative Uses of existing Tourism Development | This policy is functioning effectively, however consider if the definition of a rural area needs to be clarified.   |
| <b>TD3</b> | Montgomery Canal and Associated Development      | Reconsider policy given the role of the Montgomery Canal across several LDP topic areas and within the context of the SAC designation, Green Infrastructure and placemaking.  |
| <b>W1</b>  | Location of Waste Development                    | This policy is functioning effectively.   |
| <b>W2</b>  | Waste Management Proposals                       | This policy is functioning effectively.   |
| <b>RE1</b> | Renewable Energy                                 | Reconsider policy in light of the publication of Future Wales and changes to the consenting regime.   |

|            |   |  |
|------------|---|--|
| <b>M1</b>  | Existing Mineral Sites                                  | This policy is functioning effectively, wording to be assessed and updated as appropriate to reflect any new evidence.   |
| <b>M2</b>  | New Mineral Sites                                       | This policy is functioning effectively, wording to be assessed and updated as appropriate to reflect any new evidence.   |
| <b>M3</b>  | Borrow Pits   | There have been no applications with which to test this policy to date. The policy sign posts to national policy so should not require updating.   |
| <b>M4</b>  | Minerals Proposals                                      | This policy is being used effectively, wording to be assessed and updated as appropriate to reflect any new evidence or changes in national policy and to reflect changes to other related policies in the LDP (e.g., landscape and biodiversity). |
| <b>M5</b>  | Restoration and Aftercare                               | This policy is functioning effectively, wording to be assessed and updated as appropriate to reflect any new evidence or changes in national policy.   |
| <b>C1</b>  | Community Facilities and Indoor Recreational Facilities | This policy is functioning effectively, however its relationship with Policy DM11 may need clarification.  |
| <b>MD1</b> | Development proposals by the MOD                        | Policy not used. Consider whether the policy should be included in the Replacement LDP in its current format and if any changes are required.  |



## APPENDIX C Summary tables on status of LDP Proposals

**Table 22. Policy H2 - a) Status at 1 April 2021 of Housing Allocations (HA) and Mixed-Use Allocations (MUA)**

| Settlement                 | Site Ref | Site Location                            | No of Units | Status                          |
|----------------------------|----------|--|-------------|---------------------------------|
| Builth Wells & Llanellwedd | P08 HA2  | Land west of Primary school              | 59          | Allocated No Permission         |
| Builth Wells & Llanellwedd | P08 HA3  | Land adj. To Tai Ar Y Bryn, Hospital Rd. | 43          | Planning Permission Not Started |
| Knighton                   | P24 HA1  | Adj 'Shirley', Ludlow Road               | 24          | Planning Permission Not Started |
| Knighton                   | P24 HA3  | Presteigne Road                          | 70          | Allocated No Permission         |
| Llandrindod Wells          | P28 HA1  | Land adj. Crabtree Green                 | 50          | Planning Permission Not Started |
| Llandrindod Wells          | P28 HA2  | Tremont Park extension                   | 122         | Allocated No Permission         |
| Llandrindod Wells          | P28 HA3  | Ithon Road, Llandrindod Wells            | 122         | Commenced                       |
| Llandrindod Wells          | P28 HA4  | Land at Ridgebourne Drive                | 100         | Allocated No Permission         |
| Llanfair Caereinion        | P30 HA1  | Land at Tanyfron                         | 40          | Allocated No Permission         |
| Llanfair Caereinion        | P30 HA2  | OS 6906, Land North of Watergate Street  | 20          | Planning Permission Not Started |
| Llanfyllin                 | P32 HA1  | Land opposite Maesydre                   | 14          | Allocated No Permission         |
| Llanfyllin                 | P32 HA2  | Maesydre Field                           | 55          | Allocated No Permission         |
| Llanfyllin                 | P32 HA2  | Field 7674, South of Maesydre            | 90          | Allocated No Permission         |
| Llanidloes                 | P35 HA1  | Land at Penyborfa                        | 27          | Allocated No Permission         |
| Llanidloes                 | P35 HA2  | Chapel Farm, Gorn Road                   | 46          | Allocated No Permission         |
| Machynlleth                | P42 HA1  | OS1546, Aberystwyth Road                 | 29          | Planning Permission Not Started |
| Machynlleth                | P42 HA2  | Land adjacent HA1, Aberystwyth Rd        | 14          | Allocated No Permission         |
| Machynlleth                | P42 HA3  | Mid Wales Storage Depot                  | 14          | Allocated No Permission         |
| Montgomery                 | P45 HA1  | Land at Verlon, Forden Road              | 54          | Allocated No Permission         |
| Newtown                    | P48 HA2  | Hendidley                                | 15          | Commenced                       |
| Newtown                    | P48 HA3  | South of Heol Treowen Extension,         | 70          | Allocated No Permission         |

|                     |          |   |     |                                 |
|---------------------|----------|---|-----|---------------------------------|
| Newtown             | P48 HA4  | South of Heol Treowen / Great Brimmon           | 136 | Allocated No Permission         |
| Presteigne          | P51 HA2  | Joe Deakins Road Site                           | 35  | Allocated No Permission         |
| Rhayader            | P52 HA1  | Tir Gaia  | 70  | Commenced                       |
| Rhayader            | P52 HA2  | Land off East Street                            | 16  | Allocated No Permission         |
| Welshpool           | P57 HA1  | Land off Gallowstree Bank                       | 30  | Complete                        |
| Welshpool           | P57 HA2  | Land at Greenfields, Caeglas                    | 11  | Complete                        |
| Welshpool           | P57 HA3  | Land at Red Bank                                | 149 | Allocated No Permission         |
| Ystradgynlais Area  | P58 HA1  | Land off Brecon Road                            | 59  | Planning Permission Not Started |
| Ystradgynlais Area  | P58 HA3  | Penrhos CP School, Brecon Rd                    | 41  | Planning Permission Not Started |
| Ystradgynlais Area  | P58 HA5  | Glanrhyd Farm                                   | 8   | Allocated No Permission         |
| Ystradgynlais Area  | P58 HA9  | Penrhos Farm                                    | 76  | Allocated No Permission         |
| Ystradgynlais Area  | P58 HA10 | Brynygroes                                      | 136 | Planning Permission Not Started |
| Ystradgynlais Area  | P58 HA11 | Penrhos School Extension                        | 122 | Allocated No Permission         |
| Ystradgynlais Area  | P58 HA12 | Cynlais Playing Fields                          | 10  | Planning Permission Not Started |
| Abercrave           | P01 HA1  | Land to East of Maesycribarth                   | 14  | Allocated No Permission         |
| Abermule            | P02 HA1  | Land adjoining Abermule House                   | 10  | Superseded                      |
| Abermule            | P02 HA2  | Land adj The Meadows and land adjacent Parkside | 30  | Allocated No Permission         |
| Arddleen            | P03 HA1  | Land west of Trederwen House                    | 17  | Planning Permission Not Started |
| Berriew             | P04 HA1  | Land to the east of the village adjacent canal  | 12  | Allocated No Permission         |
| Boughrood & Llyswen | P06 HA1  | Land at Llyswen, adj to Llys Meillion           | 30  | Allocated No Permission         |
| Boughrood & Llyswen | P06 HA2  | Land adjoining Beeches Park , Boughrood         | 15  | Planning Permission Not Started |
| Bronllys            | P07 HA1  | Land adj Bronllys CP School, Neuadd Terrace     | 38  | Planning Permission Not Started |
| Bronllys            | P07 HA2  | Land at Bronllys to the west of Hen Ysgubor     | 10  | Planning Permission Not Started |
| Bronllys            | P07 HA3  | Land to rear of Greenfields                     | 6   | Commenced                       |
| Caersws             | P09 HA1  | Land north of Carno Road                        | 43  | Planning Permission Not Started |

|                           |          |  |    |                                 |
|---------------------------|----------|--|----|---------------------------------|
| Carno                     | P10 HA1  | Land off Ffordd Dol-Llin                                     | 14 | Allocated No Permission         |
| Carno                     | P10 HA2  | Land north of Gerddi Cledan                                  | 27 | Allocated No Permission         |
| Churchstoke               | P12 HA1  | Land west of Fir House                                       | 36 | Planning Permission Not Started |
| Clyro                     | P13 HA1  | Land South east of Clyro (B)                                 | 14 | Allocated No Permission         |
| Crew Green                | P15 HA1  | Land Opposite The Firs (between Malt House Farm & Bryn Mawr) | 23 | Allocated No Permission         |
| Crossgates                | P16 HA1  | Land South of Studio Cottage                                 | 19 | Allocated No Permission         |
| Forden/<br>Kingswood      | P17 HA1  | Land off Heritage Green                                      | 15 | Complete                        |
| Forden/<br>Kingswood      | P17 HA2  | Land between Heatherwood & Kingswood Lane                    | 10 | Allocated No Permission         |
| Four Crosses              | P18 HA1  | Land at Oldfield (including land rear of School)             | 32 | Allocated No Permission         |
| Glasbury                  | P19 HA1  | Treble Hill Stables, Glasbury                                | 5  | Allocated No Permission         |
| Guilsfield                | P20 HA1  | Land adj. Celyn Lane   | 20 | Allocated No Permission         |
| Guilsfield                | P20 HA2  | Land to East of Groes-lwyd                                   | 22 | Planning Permission Not Started |
| Hay on Wye                | P21 MUA1 | Land at Gypsy Castle Lane                                    | 49 | Allocated No Permission         |
| Howey                     | P22 HA1  | Land at Crossways Court                                      | 38 | Allocated No Permission         |
| Howey                     | P22 HA2  | Land adjacent Goylands Estate                                | 12 | Allocated No Permission         |
| Knucklas                  | P25 HA1  | Land at Castle Green   | 17 | Planning Permission Not Started |
| Llanbrynmair              | P26 HA1  | Land west of Bryncoch,                                       | 19 | Allocated No Permission         |
| Llandinam                 | P27 HA1  | Land opposite Old Barn Close, Llandinam                      | 8  | Allocated No Permission         |
| Llandrinio                | P29 HA1  | Gwernybatto Land off Orchard Croft                           | 30 | Allocated No Permission         |
| Llanfechain               | P31 HA1  | Land north of Church   | 25 | Allocated No Permission         |
| Llangurig                 | P33 HA1  | Land adj. Maesllan   | 19 | Allocated No Permission         |
| Llanrhaeadr-ym-Mochnant   | P36 HA1  | Land at Maes yr Esgob  | 19 | Allocated No Permission         |
| Llansantffraid-ym-Mechain | P37 HA1  | Land at Spoonley Farm  | 22 | Allocated No Permission         |
| Llansantffraid-ym-Mechain | P37 HA2  | Land adj. Maes y cain  | 13 | Allocated No Permission         |
| Llanymynech               | P40 HA1  | Land adj Parc Llwyfen  | 11 | Allocated No Permission         |

|              |          |  |    |                                 |
|--------------|----------|--|----|---------------------------------|
| Llanymynech  | P40 HA2  | Land off Carreghofa Lane               | 20 | Allocated No Permission         |
| Llanyre      | P41 HA1  | Land at Llanyre Farm                   | 19 | Allocated No Permission         |
| Meifod       | P43 HA1  | Pentre works and adjacent land         | 45 | Allocated No Permission         |
| Middletown   | P44 HA1  | Land West of Golfa Close               | 19 | Planning Permission Not Started |
| Penybontfawr | P49 HA1  | Land east of Ysgol Pennant             | 11 | Allocated No Permission         |
| Pontrobert   | P50 HA1  | Land at Y Fferm, Pontrobert            | 6  | Allocated No Permission         |
| Presteigne   | P51 MUA1 | Former Kaye Foundry Site               | 60 | Allocated No Permission         |
| Three Cocks  | P53 MUA1 | Land between/adjacent Gwernyfed Avenue | 32 | Planning Permission Not Started |
| Tregynon     | P55 HA1  | Rear of Bethany Chapel                 | 24 | Allocated No Permission         |
| Trewern      | P56 HA1  | Land east of Trewern School            | 27 | Allocated No Permission         |

**Table 23. Policy H2 b) - Status at 1 April 2021 of Housing Commitments (HC)**

| Settlement                | Site Ref | Site Location                             | No of Units | Status                          |
|---------------------------|----------|---|-------------|---------------------------------|
| Builth Wells & Llanelwedd | P08 HC1  | The Old Skin Warehouse Site, Brecon Rd    | 7           | Complete                        |
| Builth Wells & Llanelwedd | P08 HC2  | Hay Road Garage                           | 11          | Commenced                       |
| Builth Wells & Llanelwedd | P08 HC3  | Builth Wells Cottage Hospital             | 17          | Complete                        |
| Knighton                  | P24 HC1  | Former clothing factory, West Street.     | 21          | Planning Permission Not Started |
| Knighton                  | P24 HC2  | Site of former Motorway mouldings factory | 18          | Permission Lapsed               |
| Llandrindod Wells         | P28 HC1  | Land at Gate Farm                         | 10          | Permission Lapsed               |
| Llandrindod Wells         | P28 HC2  | Highland Moors                            | 16          | Complete                        |
| Llandrindod Wells         | P28 HC3  | Site adj. Autopalace                      | 22          | Commenced                       |
| Llanfyllin                | P32 HC1  | Adjacent 38 Maes Y Dderwen                | 14          | Complete                        |
| Llanidloes                | P35 HC1  | Lower Green, Victoria Avenue              | 31          | Commenced                       |
| Llanidloes                | P35 HC2  | Land at Hafren Furnishers                 | 23          | Permission Lapsed               |
| Llanidloes                | P35 HC3  | Land adjacent Dolhafren Cemetery          | 31          | Complete                        |
| Llanwrtyd Wells           | P39 HC1  | The Vicarage Field, Beulah Road           | 7           | Commenced                       |

|                     |          |   |     |                                 |
|---------------------|----------|---|-----|---------------------------------|
| Llanwrtyd Wells     | P39 HC2  | OS 2664 Caemawr, off Ffos Road                      | 47  | Commenced                       |
| Llanwrtyd Wells     | P39 HC3  | OS 1451 Meadow View, Station Road                   | 19  | Commenced                       |
| Montgomery          | P45 HC1  | Land at New Road                                    | 13  | Complete                        |
| Newtown             | P48 HC1  | Heol Pengwern                                       | 50  | Complete                        |
| Newtown             | P48 HC2  | Bryn Lane   | 65  | Commenced                       |
| Newtown             | P48 HC3  | Ffordd Croesawdy                                    | 29  | Complete                        |
| Newtown             | P48 HC4  | Land at Severn Hts, (Brimmon Close)                 | 23  | Commenced                       |
| Newtown             | P48 HC5  | Rock Farm   | 103 | Commenced                       |
| Newtown             | P48 HC6  | Rear of Pentecostal Church                          | 27  | Complete                        |
| Newtown             | P48 HC8  | Former Magistrates Court and TA building, Back Lane | 23  | Complete                        |
| Newtown             | P48 HC9  | Severnside Yard, Commercial Street                  | 48  | Complete                        |
| Newtown             | P48 HC10 | 1 Wesley Place                                      | 6   | Complete                        |
| Presteigne          | P51 HC1  | Knighton Road Site                                  | 11  | Complete                        |
| Rhayader            | P52 HC1  | Nant Rhyd-Hir                                       | 18  | Complete                        |
| Rhayader            | P52 HC2  | Old Builders Supply Depot                           | 10  | Complete                        |
| Welshpool           | P57 HC1  | Burgess Lands, Red Bank                             | 73  | Commenced                       |
| Ystradgynlais Area  | P58 HC1  | Land R/O Jeffrey's Arms, Brecon Road                | 18  | Commenced                       |
| Ystradgynlais Area  | P58 HC2  | Gurnos School, Lower Cwmtwrch                       | 45  | Complete                        |
| Bettws Cedewain     | P05 HC1  | Bryn Bechan   | 10  | Commenced                       |
| Boughrood & Llyswen | P06 HC1  | The Depot Boughrood                                 | 12  | Complete                        |
| Boughrood & Llyswen | P06 HC2  | Beeches Park, Boughrood                             | 5   | Complete                        |
| Bronllys            | P07 HC1  | Land adjacent to Bronllys Court                     | 34  | Complete                        |
| Caersws             | P09 HC1  | Part of Buck Hotel, Main Street                     | 5   | Commenced                       |
| Castle Caereinion   | P11 HC1  | Land at Swallows Meadow                             | 31  | Commenced                       |
| Churchstoke         | P12 HC1  | Land at Maes Neuadd (rear of Village Hall)          | 16  | Commenced                       |
| Churchstoke         | P12 HC2  | Land at the Garage                                  | 6   | Superseded                      |
| Churchstoke         | P12 HC3  | Land at the Hatchery                                | 12  | Complete                        |
| Churchstoke         | P12 HC4  | Land adjacent The View                              | 11  | Commenced                       |
| Clyro               | P13 HC1  | Land Southeast of Clyro (A)                         | 21  | Commenced                       |
| Crossgates          | P16 HC1  | Oaktree Meadows                                     | 15  | Commenced                       |
| Guilfield           | P20 HC1  | Sarn Meadows  | 46  | Commenced                       |
| Kerry               | P23 HC1  | Dolforgan View                                      | 62  | Commenced                       |
| Knucklas            | P25 HC1  | Old Station Works                                   | 6   | Permission Lapsed               |
| Llanbrynmair        | P26 HC1  | Bryncoch  | 5   | Planning Permission Not Started |

|                           |         |                                      |    |                                 |
|---------------------------|---------|--------------------------------------|----|---------------------------------|
| Llansantffraid-ym-Mechain | P37 HC1 | Land off Ffordd Spooney              | 12 | Complete                        |
| Llansantffraid-ym-Mechain | P37 HC2 | Bronhyddon                           | 5  | Complete                        |
| Llansilin                 | P38 HC1 | Land Opposite the Wynnstay Inn       | 23 | Commenced                       |
| Llanymynech               | P40 HC1 | PT OS 3978, Off Ashfield Terrace     | 13 | Complete                        |
| Llanyre                   | P41 HC1 | Land between Moorlands and Llyr      | 12 | Planning Permission Not Started |
| New Radnor                | P46 HC1 | Water Street Farm                    | 14 | Planning Permission Not Started |
| Newbridge on Wye          | P47 HC1 | The Orchard                          | 5  | Complete                        |
| Newbridge on Wye          | P47 HC2 | Land at Tyler's Field                | 26 | Complete                        |
| Trefeglwys                | P54 HC1 | Land to West of Llwyncelyn (Phase 2) | 17 | Complete                        |

**Table 23. Policy H11 - Status at 1 April 2021 of Gypsy and Traveller Site Allocations**

| Reference      | Site Name  | No. of pitches | Status               |
|----------------|--|----------------|----------------------|
| <b>P42 HC1</b> | Land adjacent to the Cemetery, Newtown Road, Machynlleth | 5              | 5 pitches completed. |
| <b>P57 HC2</b> | Land at Leighton Arches, Welshpool                       | 2              | 2 pitches completed. |

**Table 24. Policy E1 and E3 - Status at November 2021 of Employment Allocations and Commitments and Mixed Use Allocations**

| Reference      | Site Name                             | Size of Employment Development Area (ha) | Status   |
|----------------|---------------------------------------|--|--|
| <b>P02 EA1</b> | Abermule Business Park, Abermule      | 2.6                                      | Commenced (2.6 ha)   |
| <b>P08 EA1</b> | Wyeside Enterprise Park, Builth Wells | 0.7                                      | No planning permission   |
| <b>P08 EC1</b> | Wyeside Enterprise Park, Builth Wells | 0.5                                      | Previous planning permission   |
| <b>P12 EA1</b> | Churchstoke                           | 1.28                                     | Planning permission implemented (0.66 ha)<br>No planning permission (0.62ha) |
| <b>P18 EA1</b> | Four Crosses                          | 0.5                                      | Commenced (0.17 ha)  |

|                 |   |      |  |
|-----------------|---|------|--|
|                 |   |      | No planning permission 0.24ha)   |
| <b>P28 EA1</b>  | Heart of Wales Business Park, Llandrindod Wells | 3.9  | No planning permission   |
| <b>P35 EA1</b>  | Parc Busnes Derwen Fawr, Llanidloes             | 1.2  | No planning permission.  |
| <b>P35 EA2</b>  | Parc Hafren, Llanidloes                         | 1.2  | Complete (0.8ha)<br>No planning permission (0.4ha)                       |
| <b>P35 EC1</b>  | Parc Hafren, Llanidloes                         | 0.5  | Complete (0.5ha)   |
| <b>P42 EA1</b>  | Treowain Enterprise Park, Machynlleth           | 1.7  | No planning permission   |
| <b>P48 EA1</b>  | Llanidloes Road, Newtown                        | 2    | No planning permission   |
| <b>P51 EA1</b>  | Broadaxe Business Park, Presteigne              | 2.4  | Complete (1.5ha)<br>Commenced (0.08ha)<br>No planning permission (0.7ha) |
| <b>P52 EA1</b>  | Brynberth Enterprise Park, Rhayader             | 3.7  | No planning permission   |
| <b>P57 EC1</b>  | Buttington Cross Enterprise Park, Welshpool     | 1.5  | Complete   |
| <b>P58 EA1</b>  | Woodlands Business Park, Ystradgynlais          | 2.31 | No planning permission   |
| <b>P59 EA1</b>  | Buttington Quarry, Trewern                      | 6    | Commenced 0.43ha<br>DNS application pending on part of site              |
| <b>P60 EC1</b>  | Offa's Dyke Business Park, Welshpool            | 7.3  | Planning permission (1.76ha)<br>Complete (5.14ha)                        |
| <b>P21 MUA1</b> | Gypsy Castle Lane, Hay-on-Wye                   | 2.4  | No planning permission   |
| <b>P53 MUA1</b> | Land adj. Gwernyfed Avenue, Three Cocks         | 3.4  | Planning permission (commercial development)                             |

**Table 25. Policy R2 - Status at 1 April 2021 of Retail Allocation**

| Reference       | Site Name                       | Size of Retail Development Area (ha)                 | Status                 |
|-----------------|---------------------------------|--|------------------------|
| <b>P51 MUA1</b> | Former Kaye Foundry, Presteigne | 0.4<br>(to provide 1000 sq. m net retail floorspace) | No planning permission |

## ABBREVIATIONS

| <b>Acronym</b> | <b>Meaning</b>                                |
|----------------|---|
| AMR            | Annual Monitoring Report                      |
| AQMA           | Air Quality Management Area                   |
| BBNPA          | Brecon Beacons National Park Authority        |
| CJC            | Corporate Joint Committee                     |
| DPM3           | Development Plans Manual (Edition 3)          |
| EA             | Employment Allocation                         |
| EC             | Employment Commitment                         |
| ELR            | Employment Land Review                        |
| GCR            | Geological Conservation Review site           |
| GIA            | Green Infrastructure Assessment               |
| GTAA           | Gypsy and Traveller Accommodation Assessment  |
| HA             | Housing Allocation                            |
| HC             | Housing Commitment                            |
| HIA            | Health Impact Assessment                      |
| HRA            | Habitats Regulations Assessment               |
| ISA            | Integrated Sustainability Appraisal           |
| JNCC           | Joint Nature Conservation Committee           |
| LBAP           | Local Biodiversity Action Plan                |
| LDP            | Local Development Plan                        |
| LHMA           | Local Housing Market Assessment               |
| LLCA           | Local Landscape Character Assessment          |
| LPA            | Local Planning Authority                      |
| LSA            | Local Search Area                             |
| LVIA           | Landscape and Visual Impact Assessment        |
| MTAN           | Minerals Technical Advice Note                |
| MUA            | Mixed Use Allocation                          |
| OSA            | Open Space Assessment                         |
| PCC            | Powys County Council                          |
| PEDW           | Planning and Environment Decisions Wales      |
| PPW            | Planning Policy Wales                         |
| PSB            | Public Service Board                          |
| RAWP           | Regional Aggregates Working Party             |
| REA            | Renewable Energy Assessment                   |
| RIGS           | Regionally Important Geodiversity Sites       |
| RSL            | Registered Social Landlord                    |
| RTS            | Regional Technical Statement                  |
| SA             | Sustainability Appraisal                      |
| SAB            | SuDS Approving Body                           |
| SAC            | Special Area of Conservation                  |
| SDP            | Strategic Development Plan                    |
| SEA            | Strategic Environmental Assessment            |
| SFCA           | Strategic Flood Consequences Assessment       |
| SHA            | Strategic Housing Authority                   |
| SoNaRR         | State of Natural Resources Report             |
| SPG            | Supplementary Planning Guidance               |
| SuDS           | Sustainable drainage systems                  |
| SWRAWP         | South Wales Regional Aggregates Working Party |
| TAN            | Technical Advice Note                         |
| WLIA           | Welsh Language Impact Assessment              |



## APPENDIX D Summary of Representations and Council Responses

| No. | Representor           | Summary of Comments  | Council Responses  |
|-----|-----------------------|--|--|
| 1.  | Swansea Canal Society | <p><b>Tourism and historic environment</b><br/>                     Supportive of the further safeguarding of the historic and cultural heritage of Powys and benefits to tourism. Refers to restoration work on the Swansea Canal and the numerous industrial archaeological monuments surviving in the southern Powys region around the Ystradgynlais and Abercraf areas, with reference to various publications, lists and indexes. Considers the industrial monuments listed in the response to be worthy of inclusion in the lists of structures to be protected and promoted to support the heritage and cultural aspects and also the tourism potential of the County of Powys.</p> | <p><b>Tourism and historic environment</b><br/>                     The Council notes the detailed response provided in respect of the history of the Swansea canal and the recorded surviving structures, together with the tourism benefits. Additional text is to be inserted under section 8.5 of the Review Report regarding the consideration of important tourism and heritage features as part of the Replacement LDP.</p>   |
| 2.  | Coal Authority        | <p><b>Coal mining features, resources and potential risks</b><br/>                     Refers to Coal Authority records indicating coal mining features (mining features and surface coal resources) within the Powys County Council area at surface and shallow depth, and also surface coal resource present within the area, referring to planning advice in this respect.<br/>                     Also refers to the conclusion of the review in respect of retaining Policy DM10 Contaminated and Unstable Land, with no objections raised subject to the policy including consideration of the potential risks posed by past coal mining activity.</p>                              | <p><b>Coal mining features, resources and potential risks</b><br/>                     The Council notes the comments received. As set out in the Review Report, there is no longer a requirement for LDP policies to safeguard coal resources, as explained in Planning Policy Wales (para. 5.10.17). However, additional text will be provided under section 8.11 of the Review Report in order to reflect considerations relating to coal mining features and resources in the review of LDP policy DM10.</p> |
| 3.  | CPRW Montgomeryshire  | <p><b>Housing</b><br/>                     Allocations and the settlement tier system need to be reviewed so that smaller settlements are not subject to the same large proposals as towns. Issues around the</p>  | <p><b>Housing</b><br/>                     As set out in the Review Report, the LDP's spatial strategy, including the settlement tiers and allocations, will be reviewed as part of the Replacement LDP process, informed by a</p>   |

|  |   |  |
|--|---|--|
|  | <p>impact on infrastructure, resources, and communities, employment opportunities, travel and carbon footprint. The character of the site, settlement and area needs to be considered.</p> <p><b>Carbon retention</b><br/>Need to protect important peat and dark soils from inappropriate industrial scale development.</p> <p><b>Pre-assessed Areas</b><br/>List of factors not taken into account, a full assessment and consultation is needed to refine Pre-assessed Areas at a local level, along with a benefit analysis taking into account disbenefits, potential damage and decreasing wind.</p> <p><b>Intensive Agricultural Unit</b><br/>Support the need for a policy with rigorous guidance, must take into account proximity of unrelated dwellings and highways impacts of manure disposal.</p> <p><b>Active Travel</b><br/>Measures need to encourage walking and cycling between communities and should not be limited by population size, with little or no public transport in smaller communities.</p> <p><b>Landscape</b><br/>This needs to be carried out and rigorously applied in planning, along with protection for best and most versatile agricultural land, and the importance of Powys landscape as a resource needs to be an overriding consideration throughout.</p> <p><b>Planning obligations</b><br/>Needs to include funds to maintain community resources in perpetuity, perhaps managed by Town and Community Councils who should be consulted early in the process to ensure the right planning gain is achieved for the community.</p> | <p>Settlement Assessment. No changes are proposed to the Review Report in this respect.</p> <p><b>Carbon retention</b><br/>As set out in the Review Report, LDP policy DM13, which includes criteria relating to thick peat, is to be re-considered as part of the Replacement LDP. No changes are proposed to the Review Report in this respect.</p> <p><b>Pre-assessed Areas</b><br/>These comments relate to national planning policy within Future Wales and PPW, which includes detailed policies and criteria for assessing wind energy proposals within these areas. PPW states that LPAs should not seek to amend the pre-assessed areas within their boundaries as they form part of the development plan. No changes are proposed to the Review Report in this respect.</p> <p><b>Intensive Agricultural Unit</b><br/>As set out in the Review Report, the LDP’s agricultural policies will be reconsidered to reflect contextual changes. Additional text to be inserted under section 8.2 of the Review Report to clarify that this will include consideration of including an appropriate policy for intensive agricultural developments within the Replacement LDP.</p> <p><b>Active Travel</b><br/>The Council notes the comments on active travel, which will be an important consideration for the Replacement LDP, and included as part of the Settlement Assessment. No changes are proposed to the Review Report in this respect.</p> <p><b>Landscape</b><br/>The Local Landscape Character Assessment will inform the strategy, policies and proposals of the LDP, and is also intended to provide Supplementary Planning Guidance to inform development proposals and planning decisions. Planning Policy Wales contains national policy on best and</p> |
|--|---|--|

|    |   |   |   |
|----|---|---|---|
|    |   |   | <p>most versatile agricultural land, which will be considered in the site selection process. No changes are proposed to the Review Report in this respect.</p> <p><b>Planning obligations</b></p> <p>As set out in the Review Report, the methods for providing infrastructure to support development will be considered as part of the Replacement LDP process. The Planning Obligations Supplementary Planning Guidance will also be reviewed, which will include consideration around how obligations are managed. No changes are proposed to the Review Report in this respect.</p> |
| 4. | Cadw, Historic Environment Branch, Welsh Government | <p><b>Consultation with Cadw and CPAT</b></p> <p>No comments but a reminder that Cadw should be consulted as part of the SEA process and that it is important to consult with Clwyd-Powys Archaeological Trust (CPAT) who are funded to provide advice during the LDP process, in relation to the archaeological issues.</p>  | <p><b>Consultation with Cadw and CPAT</b></p> <p>The Council notes the reminder with regards to consultation with Cadw as part of the SEA process associated with the Replacement LDP. The Council has already engaged with CPAT in reviewing the LDP and will continue to do so as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p>  |
| 5. | United Utilities                                    | <p><b>Water infrastructure</b></p> <p>Express wish to work in partnership, to pro-actively identify needs and share information between LPA and UU. Provides contacts for developers to access free pre-application advice on waste and water. Highlights the need to protect strategic water infrastructure assets and for early engagement on proposed allocations at RLDP stage to ascertain constraints and implications. Request for continued consultation as the Plan moves forward.</p> | <p><b>Water infrastructure</b></p> <p>The Council recognises the relevance of the matters raised for the Replacement LDP in terms of infrastructure planning, the site selection process and for site promoters, and as part of the Settlement Assessment to identify opportunities and constraints. The Council will continue to consult with United Utilities as part of the Replacement LDP process and for relevant planning applications. No changes are proposed to the Review Report in this respect.</p>  |
| 6. | Network Rail  | <p><b>Rail infrastructure</b></p> <p>Policies relating to the protection and enhancement of railway infrastructure are relevant and development schemes may necessitate developer contributions. Reminding LPA of statutory duty to consult regarding development impacts upon level crossings and developers</p>   | <p><b>Rail infrastructure</b></p> <p>The Council recognises the relevance of the matters raised for the Replacement LDP in terms of infrastructure planning, development schemes close to railways and the potential impact of new development on the operation of the railway and level crossing use. The Council will continue to consult</p>   |

|    |   |  |   |
|----|---|--|---|
|    |   | to fund any required improvements. Request to please consult Network Rail on any future policy, pre-application or planning applications should they be submitted for sites adjoining the railway or within close proximity to the railway as development may impact upon operation of the railway, e.g. use of the nearby station and/or railway crossings and Network Rail would make specific comments as required.   | with Network Rail as part of the Replacement LDP process and for relevant planning applications. No changes are proposed to the Review Report in this respect.  |
| 7. | Glandŵr Cymru, the Canal & River Trust in Wales | <b>Montgomery Canal</b><br>Comments related LDP Policy TD3. The Trust looks forward to working with the Council on how best to ensure that the important multifunctional nature and status of the Canal, as well as supporting the restoration of the Canal and ensuring that future development does not prejudice the restoration, and to align regional priorities. Preference for a standalone policy relating to the Montgomery Canal to cover the breadth of topic areas involved, including the suggestion that it may sit under a Transport or Environmental Protection chapter within the LDP. Offer to work with the Council to draft suggested wording for a Montgomery Canal related policy. | <b>Montgomery Canal</b><br>The Council notes the comments received in relation to the Montgomery Canal. As set out within the Review Report, the current LDP policy TD3 will be reconsidered to reflect the role of the Canal across several LDP topic areas and in terms of where the policy should sit within the LDP. The Council will continue to consult with the Canal & River Trust in Wales as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.   |
| 8. | Mineral Products Association Wales              | Support proposed Full Revision of the plan.<br><b>Minerals Safeguarding</b><br>Concerns raised by the Annual Monitoring Report regarding inconsistencies in the implementation of LDP Policy DM8. This is a major cause for concern to the minerals industry. The Council will need to clarify how this will be addressed.<br><b>Regional Technical Statement</b><br>Disagreement with certain statements made within the Review Report regarding the future requirements for sand and gravel aggregate allocations. Highlighting the need for changes in mineral reserves to be reflected in the  | Support noted. Technical advice has been obtained regionally in order to respond to these comments, which highlights some errors within the MPA Wales response.<br><b>Minerals Safeguarding</b><br>The concern is noted. As explained in the Review Report, further officer training and constraints mapping will assist, together with revised policy wording to improve clarity as part of the Replacement LDP. No changes are proposed to the Review Report in this respect.<br><b>Regional Technical Statement</b><br>The Council have taken advice on the comments submitted and disagree with the points made regarding calculations on |

|  |   |  |
|--|---|--|
|  | <p>Council’s evidence base. The landbank will fall below that required during the mid-term period of the Replacement LDP. Highlights the need for Statements of Subregional Collaboration (SSRC) as indicated in the Regional Technical Statement. The need for allocations should be considered in the Replacement LDP and the Plan will need to refer to the requirement for a minimum 10 year landbank of crushed rock throughout the plan period and for the RTS to be reviewed at 5 year intervals. Reference to PPW, commenting that mineral reserves in Powys are undoubtedly of national importance and we welcome the council’s consideration of the wider context of the reserves.</p> <p><b>New Evidence Base Requirements Infrastructure Plan</b><br/>New infrastructure proposals should be supported by a complementary resource assessment and supply chain audits, which identify the quantities and sources of raw materials required to deliver the infrastructure.</p> <p><b>Replacement dwellings policy</b><br/>Support policies which seek to maintain local vernacular, however, seek a positive approach to the supply of local building stone which help to maintain the character of an area.</p> <p><b>Supplementary Planning Guidance</b><br/>Suggest appropriate guidance on Minerals Safeguarding should be brought forward at the earliest opportunity.</p> <p><b>Collaborative working</b><br/>Request reference to the Statements of Sub-Regional Collaboration (SSRCs) detailed in the RTS 2<sup>nd</sup> Review, given Powys is recognised as an important supplier of mineral products on a local, regional and national scale.</p> | <p>the land bank and also on the content regarding land won sand and gravel. Para 5.2.7 of the Review Report specifies what the RTS2 sets out as the reserves and landbank. The SWRAWP Annual Report for 2019 (the latest one) shows that the landbank had increased to more than 50 years. With regards to the need for SSRC, Powys is a Sub-region in its own right and therefore only needs to agree with itself and does not cover the requirements of other LPAs. The comments on land won sand and gravel are incorrect as there is no requirement for Powys.</p> <p><b>New Evidence Base Requirements Infrastructure Plan</b><br/>The scope of the Infrastructure Plan will be determined as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Replacement dwellings policy</b><br/>LDP Policy H9 will be revised to address issues identified around the implementation of the policy, as set out in the Review Report. The details of the policy and scope to address the supply of local building stone will be considered as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Supplementary Planning Guidance</b><br/>In addition to reviewing adopted SPG, the LPA will also identify the need for new SPG to support the implementation of RLDP policies. The need for SPG to support the minerals safeguarding policy will be considered. Additional text to be inserted under section 8.14 clarifying this.</p> <p><b>Collaborative working</b><br/>The RTS is mentioned in several places in the Review Report, and, as explained above, the SSRC process is not relevant to Powys. No changes are proposed to the Review Report in this respect.</p> |
|--|---|--|

|           |  |   |  |
|-----------|--|---|--|
| <p>9.</p> | <p><b>Powys Local Access Forum</b></p> | <p>Welcome proposal to prepare a new LDP.</p> <p><b>Public rights of way</b><br/>The loss of access to public rights of way through lack of maintenance, blockages and illegal development is not referenced and should be highlighted. Request the protection given to, and provision made for, public open space to be extended to consider rights of way. The current condition of the rights of way in Powys is adversely affecting the attractiveness of the area to tourists.</p> <p><b>Green Infrastructure Assessment</b><br/>Request for a specific assessment of the condition of rights of way in Powys that includes how much of it is accessible and easy to use.</p> <p><b>Transport issues</b><br/>Request for horse riders to be included alongside walking and cycling, including those with mobility issues and the extent to which the current infrastructure makes appropriate provision for them. It will also be important to consider the extent to which highways no longer publicly maintained and Other Routes with Public Access (ORPAs) could be used to improve the transport infrastructure.</p> <p><b>Planning obligations</b><br/>Request for an assessment to be made on the extent to which to Council is maximising such obligations when planning applications are close to, or on, development sites, and query about introducing a Community Infrastructure Levy to replace planning obligations.</p> | <p>Support noted.</p> <p><b>Public rights of way</b><br/>The results of LDP’s Annual Monitoring Report, summarised in the Review Report, do not capture the loss of access to public rights of way. LDP Policy SP7, together with LDP Policy DM13 which includes a criterion relating public rights of way, is to be reconsidered as part of the Replacement LDP, including how effective these policies have been implemented. Some of the matters raised are addressed by Highways Operations, rather than Planning, and may be part of the Rights of Way Improvement Plan. The Replacement LDP will need to consider public rights of way in the context of Green Infrastructure. No changes are proposed to the Review Report in this respect.</p> <p><b>Green Infrastructure Assessment</b><br/>Public rights of way will be considered, however the scope of this may not extend to assessment of the condition. No changes are proposed to the Review Report in this respect.</p> <p><b>Transport issues</b><br/>These comments are noted, and, where relevant, will be considered as part of the Replacement LDP process. The comments regarding disused transport routes are noted and additional text will be inserted in para. 8.3.3 and Appendix B of the Review Report to reflect this consideration.</p> <p><b>Tourism</b><br/>These comments are noted, see response above relating to rights of way. No changes are proposed to the Review Report in this respect.</p> <p><b>Planning obligations</b><br/>As set out in the Review Report, the methods for providing infrastructure to support development will be considered as part of the Replacement LDP process. This will include consideration of whether the Council should follow the</p> |
|-----------|--|---|--|

|     |                                    |   |  |
|-----|------------------------------------|---|--|
|     |                                    |   | Community Infrastructure Levy process. No changes are proposed to the Review Report in this respect.   |
| 10. | Powys Ramblers                     | NOTE: The comments received from Powys Ramblers are the same as those received from the Powys Local Access Forum, with the exception that the Powys Ramblers have not mentioned horse riders in their response.   | See response above to the Powys Local Access Forum.  |
| 11. | The Llanigon Community Green Space | <p><b>Housing Growth</b><br/>Recent development in the Small Village of Llanigon representing an increase of 30%. Do not have the road network to take on any more growth and housing developments.</p> <p><b>Wellbeing, community facilities and public open space</b><br/>Need in the village for a safe green space to build up the community to help maintaining health and wellbeing. Also, to protect natural resources, nature and habitats. Wishes for the revised LDP to include Llanigon School site to be designated as Community Green Space, which would be used to provide recreational, sport, allotments and other activities. It is important to protect open spaces and to ensure that the planning departments follow the LDP.</p> | <p><b>Housing Growth</b><br/>The Replacement LDP will reconsider the Housing Growth and Spatial Strategy across Powys LDP area (how much growth we should plan for and where it should go). The Replacement LDP will be informed by results of settlement analysis, which sets out to analyse the role and function of each settlement and consider the constraints to development and the opportunities for sustainable place-making. No changes are proposed to the Review Report in this respect.</p> <p><b>Wellbeing, community facilities and public open space</b><br/>Health and well-being, recreational opportunities, environmental protection and green spaces (green infrastructure) are all relevant topics. The DA includes reference to a Candidate Sites/Sites Nominations stage, and we would suggest that you submit your proposals for the Community Green Space on the site at that stage. No changes are proposed to the Review Report in this respect.</p> |
| 12. | Hughes Architects                  | <p><b>Housing Allocations</b><br/>Lack of housing delivery suggest that the allocated sites system is not working. The focus on larger allocated sites in an area with low property values and therefore low interest from private developers leads to this lack of development. Suggests a system with greater flexibility which allows the development of more smaller sites</p>  | <p><b>Housing Allocations</b><br/>The Growth and Spatial Strategies, including housing allocations, will be re-considered as part of the Replacement LDP process. This will include consideration of housing delivery options, including small sites, as required by PPW. No changes are proposed to the Review Report in this respect.</p>  |

|     |   |  |  |
|-----|---|--|--|
|     |   | <p>should be considered. Encouragement of self-build of one off plots should also be encouraged.</p> <p><b>Phosphates</b><br/>The phosphates issue has rendered much of the county undevelopable. Private development was very slow to non-existent prior to that issue arising so a working solution must be found as soon as possible.</p>   | <p><b>Phosphates</b><br/>The Replacement LDP process will enable the LPA to contribute towards addressing issues that have arisen, including the impact of phosphates on Special Area of Conservation catchments, as set out in the LDP Review Report. No changes are proposed to the Review Report in this respect.</p>   |
| 13. | Caersws CRG (Concerned Residents Group) | <p><b>Flooding</b><br/>If there is any possible doubt of flooding within a planned candidate site, or to increase or create any issues to current third parties, more thorough scrutiny should be made at an earlier stage of the LDP process, allowing for more extreme climate changes, which may become apparent at a later date, even possibly before any planning permission is passed.</p> <p><b>Housing Allocations</b><br/>Querying why so few sites that were allocated on the LDP have been developed, whether due to viability, and have been allocated on the basis that they were the “best of a bad bunch” in that particular village or town.</p> | <p><b>Flooding</b><br/>As set out in the Review Report, the LDP’s policies relating to flooding will be reconsidered to reflect the new TAN 15 and Flood Map for Planning, and informed by a Strategic Flooding Consequences Assessment, which will also be used to assess candidate sites. No changes are proposed to the Review Report in this respect.</p> <p><b>Housing Allocations</b><br/>The Review Report recognises that the issue around the delivery of the LDP’s housing growth is due to a variety of factors, including the speed in which allocated sites are coming forward. No changes are proposed to the Review Report in this respect.</p> |
| 14. | Individual                              | <p>Finds the Introduction very useful.</p> <p><b>Population projections</b><br/>As the census is part of the baseline for population numbers, etc, advised to wait until it is available. Table 9 shows the results are very poor, which must be rectified.</p> <p><b>Town and Community Councils</b><br/>The position and responsibilities of Town and Community Councils is not mentioned at all. These are the first layer of democratic government, not volunteers but elected representatives of the public.</p>  | <p>Support is noted.</p> <p><b>Population projections</b><br/>As set out in the Review Report, the Census will provide a key source of evidence to inform the Replacement LDP and associated SA process. The Replacement LDP process will enable the LPA to respond to changes around population and household projections. No changes are proposed to the Review Report in this respect.</p> <p><b>Town and Community Councils</b><br/>The Delivery Agreement Consultation Draft, which has been consulted upon alongside the Review Report, explains the proposed involvement of consultees, including Town and</p>  |



|     |  |  |   |
|-----|--|--|---|
|     |  |  | Community Councils, in the Replacement LDP process. No changes are proposed to the Review Report in this respect.   |
| 15. | Dolafon Trust<br>(Plymouth Brethren<br>Christian Church) | <p><b>Community facilities and services</b><br/>Fails to include any reference to the provision of public places of worship. The provision of appropriately located (proximity to the congregation) places of worship is essential for a sustainable future for Powys.</p>   | <p><b>Community facilities and services</b><br/>The existing policies C1 and DM11 of the adopted Powys LDP make provision for and protect community facilities and services. Places of worship are included in a list of examples of community facilities and services in the adopted Powys LDP (para. 4.12.5). Consideration will be given to providing a comprehensive list of community services and facilities in the Replacement LDP, as explained in the Review Report. No changes are proposed to the Review Report in this respect.</p>   |
| 16. | Hay Town Council   | <p><b>Housing</b><br/>Query about whether all new council homes could be supplied with environmentally friendly measures, tree-planting where possible, and additional biodiversity habitat.</p> <p><b>Affordable Housing</b><br/>Note that the target for affordable homes was met in North Powys, but not in South Powys. Request for affordable homes to be prioritised in South Powys during the remainder of the Plan period. Also of the view that the quote of affordable homes built by developers per planning application should be guaranteed once permission has been granted, and that reducing the number of affordable homes, in the context of higher costs than expected, should not be allowable.</p> <p><b>Economic Development</b><br/>Request for consideration to be given to transforming Bronllys Health Park into a general hospital, given the distances from Hay to a general hospital.</p> <p><b>Transport</b><br/>Support for the prioritisation of public transport, however, would like to be more involved in the consultation and</p> | <p><b>Housing</b><br/>Affordable housing provided by the Council are required to meet Welsh Government development quality standards for social grant and planning purposes. They are also required to meet the latest building regulations, which include high energy efficiency standards, along with planning policy requirements, e.g. around biodiversity enhancements. These comments have been referred onto the Strategic Housing Authority for their attention. No changes are proposed to the Review Report in this respect.</p> <p><b>Affordable Housing</b><br/>Section 8.1 of the Review Report explains that the reason for developments permitted in the Central Powys submarket area not achieving the policy target was due to the sites obtaining planning permission under the previous Unitary Development Plan. Therefore, they do not reflect the implementation of the current LDP policies. The re-negotiation of affordable housing on viability grounds is enabled by national planning policy and the LDP policies must conform with this. No changes are proposed to the Review Report in this respect.</p> |

|  |  |   |
|--|--|---|
|  | <p>decision-making process in order to improve public transport and become more integrated. Regarding LDP Policy 1 public transport to services in nearby towns and facilities would not meet the ambitions around ensuring efficient, effective and integrated system with regard to safety of all users. In favour of the need to decrease use of private cars and increasing walking, cycling and use of public transport. Query whether adequate maintenance of bus shelters will be included in the Replacement LDP. Also, that no development should take place on disused railway lines, as has happened on the former railway land from Hereford to Swansea.</p> <p><b>Retailing and Town Centres</b><br/>Would be in favour in principle, subject to consultation, to a corner shop being part of any new developments in Hay (for example at the top of Gypsy Castle Lanes).</p> <p><b>Community and Indoor Recreation Facilities</b><br/>Regarding inconsistency in implementation of LDP Policy DM11, refers to a case involving the removal of the old community centre in Hay with promised replacement community centre, and inadequacy of a small community room in the new library.</p> <p><b>Natural environment</b><br/>Would it be possible for Powys CC to work more closely with Town and Community Councils to help designate areas to be considered for geodiversity protection?</p> <p><b>Dark Skies</b><br/>Query whether it is possible to promote the Dark Skies sites (eg Brecon Beacons National Park) more effectively, as they are real assets with people connection to the natural environment and local environmental benefits.</p> | <p><b>Economic Development</b><br/>The comments are noted and will be taken into consideration when the relevant section(s) of the LDP are being reviewed as part of the RLDP work and in conjunction with relevant stakeholders. Please see the Timetable and Community Involvement Scheme in the Delivery Agreement which includes a window on the Sites Nomination stage (proposed from autumn 2022). No changes are proposed to the Review Report in this respect.</p> <p><b>Transport</b><br/>The Council notes the comments on public transport improvements. This will be a matter closely considered for the RLDP process as planning policy at all levels (national, regional and local) implements a sustainable transport hierarchy to maximise accessibility by walking, cycling and public transport. The maintenance of bus shelters is not a planning matter. The Review Report explains that disused railways will be identified and the policy approach considered as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Retailing and Town Centres</b><br/>The Review Report explains that LDP's retail policies will be re-considered as part of the Replacement LDP. Site specific requirements cannot be considered at this review stage. No changes are proposed to the Review Report in this respect.</p> <p><b>Community and Indoor Recreation Facilities</b><br/>It is understood that the case mentioned was located outside of the Powys LDP area, within the Brecon Beacons National Park. Issues around the implementation of the Powys LDP policy have been identified as part of LDP annual monitoring and will be addressed as part of the Replacement LDP. No changes are proposed to the Review Report in this respect.</p> |
|--|--|---|

|  |  |  |
|--|--|--|
|  | <p><b>Public Open Spaces</b><br/>         Query whether it would be possible to strengthen policies between Open Spaces and Green Infrastructure teams within Powys CC to ensure greater levels of synergy and a more holistic approach.</p> <p><b>Habitats Regulations Assessment</b><br/>         Comment that the HRA has no weighting for impact on humans, with the example given of the closure of canoe launching from the Bont Glasbury and impact on its human users, which is considered to far outweigh the benefits to the river habitat. Argue that the HRA should consider the impact of HRAs on humans.</p> <p><b>Phosphates</b><br/>         We would encourage the Welsh Government to solve this issue immediately as one of the knock-on impacts has been the lack of any affordable homes being built across Powys, to the detriment of local residents.</p> | <p><b>Natural environment</b><br/>         The LPA is not responsible for designating sites of geodiversity interest (they are designated by UNESCO or nationally). However, the Review Report identifies the need to consider the wording of Policy DM2 in relation to geodiversity and in the context of green infrastructure. No changes are proposed to the Review Report in this respect.</p> <p><b>Dark skies</b><br/>         LDP Policy DM7 recognises the Brecon Beacons National Park Dark Sky Reserve. The Review Report identifies issues with the implementation of this policy that will be addressed as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Public Open Spaces</b><br/>         The Review Report explains that consideration will be given to integration between open spaces and green infrastructure policies as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Habitats Regulations Assessment</b><br/>         The HRA process is governed by national regulations aimed at assessing the impact of the LDP on nature conservation importance of Special Areas of Conservation and Special Protection Areas, and therefore it does not assess the impact on humans. The Sustainability Appraisal for the Replacement LDP will cover social, economic, cultural, and environmental effects of the LDP in the context of sustainable development. No changes are proposed to the Review Report in this respect.</p> <p><b>Phosphates</b><br/>         The Replacement LDP process will enable the LPA to contribute towards addressing issues that have arisen, including the impact of phosphates on Special Area of Conservation catchments, as set out in the LDP Review</p> |
|--|--|--|

|     |   |  |  |
|-----|---|--|--|
|     |   |  | Report. No changes are proposed to the Review Report in this respect.  |
| 17. | Clwyd Alyn Housing Ltd                                  | <p><b>Housing need and delivery</b><br/>Clwyd Alyn Housing Limited (CAHL) is a key deliverer of Affordable and other socialist need housing within the County. The challenges in delivery housing through Wales and County is not underestimated by CAHL. As a partner of the Council it supports the principle of early LDP review as a means of reviewing how and where housing is to be provided to meet the needs of the County and the aspirations of Welsh Government in delivering sustainable places, housing and meeting the needs of the county's population. No further comments at this stage.</p> | <p><b>Housing need and delivery</b><br/>Support is noted. Matters relating to affordable housing need and delivery will be considered as part of the Replacement LDP, as indicated in the Review Report. The LPA will be engaging with Housing Associations as part of the Replacement LDP process.</p>  |
| 18. | Bronllys Well Being Park CLT (Community Land Trust) Ltd | <p><b>Bronllys Health Park</b><br/>Request for LDP current Policy E5 (Bronllys Health Park) to be retained in its entirety in the Powys RLDP:</p> <p>Policy E5 – Bronllys Health Park: Proposals to develop the site of Bronllys Hospital as a Health &amp; Wellbeing Park will be supported.</p>  | <p><b>Bronllys Health Park</b><br/>The comments are noted and will be taken into consideration when the relevant section(s) of the LDP are being reviewed as part of the RLDP work and in conjunction with relevant stakeholders. Please see the Timetable and Community Involvement Scheme in the Delivery Agreement which includes a window on the Sites Nomination stage (proposed from autumn 2022). No changes are proposed to the Review Report in this respect.</p> |
| 19. | Individual  | <p><b>Bronllys Health Park</b><br/>Request for LDP current Policy E5 (Bronllys Health Park) to be retained in its entirety in the Powys RLDP:</p> <p>Policy E5 – Bronllys Health Park: Proposals to develop the site of Bronllys Hospital as a Health &amp; Wellbeing Park will be supported.</p>  | <p><b>Bronllys Health Park</b><br/>The comments are noted and will be taken into consideration when the relevant section(s) of the LDP are being reviewed as part of the RLDP work and in conjunction with relevant stakeholders. Please see the Timetable and Community Involvement Scheme in the Delivery Agreement which includes a window on the Sites Nomination stage (proposed from autumn 2022). No changes are proposed to the Review Report in this respect.</p> |
| 20. | Natural Resources Wales                                 | <b>Conclusion of the review</b>  | <b>Conclusion of the review</b><br>Comments noted.   |

|  |  |   |
|--|--|---|
|  | <p>Note the conclusion that a full revision procedure is considered the most appropriate form of review due to the numerous changes in policy and guidance.</p> <p><b>Contextual changes</b><br/>Welcome confirmation that the RLDP will have regard to the Second State of Natural Resources Report and the Mid Wales Area Statement. Also refer to Welsh Government’s ‘Essentials Guide – Sustainable Management of Natural Resources and our Well-being’. Encourage the Council to consider how Area Statements can be used to underpin and enhance the RLDP through creating a topic or evidence paper to specifically consider the Section 6 Duty and the Council’s declaration of Climate Emergency.</p> <p><b>RLDP’s Monitoring Framework</b><br/>Should not be a mere update of the existing framework and should look to build upon the Council’s Climate Emergency focus and other national policy and guidance.</p> <p><b>Sustainability Appraisal (SA) monitoring</b><br/>Indicator 19 has not reported on how flood plains have been retained to store water through development thereby reducing flooding in the catchment elsewhere including neighbouring Councils. Welcome that the next AMR will consider NRW’s protected sites baseline assessment 2020 and therefore inform the RLDP. Advise other evidence is also considered in the assessment, including Lichen surveys to investigate ammonia impacts – Report No. 298 (May 2019), and other information available, such as the River Wye Management Plan and Air Pollution Information System.</p> <p><b>Phosphates</b><br/>Confirm that NRW’s advice is no longer ‘interim’ advice and will be updated systematically to support the planning process, with next update expected in Spring 2022.</p> | <p><b>Contextual changes</b><br/>Additional text will be inserted under section 5 of the Review Report to refer to this Essentials Guide. The LPA will also consider the suggestion for a topic or evidence paper relating to the section 6 duty as part of the Replacement LDP process.</p> <p><b>RLDP’s Monitoring Framework</b><br/>The Council agrees that the monitoring framework for the RLDP needs to be thoroughly reviewed in order to take into account contextual changes, along with new approaches and information, as noted in section 9 of the Review Report. No changes are proposed to the Review Report in this respect.</p> <p><b>Sustainability Appraisal (SA) monitoring</b><br/>The results of the SA monitoring in respect of floodrisk, based on the wording of indicator 19, focuses on monitoring the number of properties at medium or high risk of flooding, rather than on retention of floodplains. The suggestions around other evidence and information are noted. These will be considered in reviewing the SA and its monitoring framework as part of the Replacement LDP process. No changes are proposed to the Review Report in this respect.</p> <p><b>Phosphates</b><br/>Additional text to section 5 to clarify that the latest NRW planning advice is no longer ‘interim’ advice.</p> <p><b>Peat</b><br/>The programme and mapping referred to, relating to peat, will be used as evidence to inform the Replacement LDP and associated SA, and to inform the assessment of development proposals. No changes are proposed to the Review Report in this respect.</p> <p><b>Soil degradation</b><br/>Additional text will be inserted in Section 8.2 of the Review Report, to reflect the need to protect soil from degradation,</p> |
|--|--|---|

|  |   |  |
|--|---|--|
|  | <p><b>Peat</b><br/>Refer to the National Peatland Action Programme priorities and available maps of peat within Wales as available evidence bases to help identify areas in need of protection because of their geological or soil type importance.</p> <p><b>Soil degradation</b><br/>Consideration of the use, conservation and prevention of soil degradation through new farming enterprises requiring planning permission to be taken forward to the RLDP.</p> <p><b>Intensive Agricultural Units</b><br/>Advise the RLDP should address the challenges associated with agricultural developments in Powys. Reminder of the need to put in place policies which consider the cumulative impacts of such developments. Encourage to use sufficient and adequate agricultural, land use, land cover and habitat evidence to inform the RLDP so that agricultural developments are in place which do not threaten the ability of nature recovery efforts, such as Mid Wales Growth Deal funding to restore part of the Montgomery Canal SAC.</p> <p><b>Green Infrastructure Assessment (GIA)</b><br/>Stress that GI should not just be restricted to urban context, the rural urban fringe and wedge concepts should be considered in a future GIA. The GIA might provide a mechanism or delivery vehicle for nature-based solutions and biodiversity enhancements to achieve overarching objectives of the RLDP and Powys Well-being Plan.</p> | <p>within the scope of the planning system, as part of the Replacement LDP process.</p> <p><b>Intensive Agricultural Units</b><br/>As set out in the Review Report, the LDP’s agricultural policies will be reconsidered to reflect contextual changes. Additional text to be inserted under section 8.2 of the Review Report to clarify that this will include consideration of including an appropriate policy for intensive agricultural developments within the Replacement LDP.</p> <p><b>Green Infrastructure Assessment (GIA)</b><br/>Advice in respect of the scope of the GIA noted and will be considered in undertaking a GIA as part of the evidence base for the Replacement LDP. No changes are proposed to the Review Report in this respect.</p> |
|--|---|--|