



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

Powys Growth and Spatial Options:

Spatial Options Background Paper

May 2024

Mae'r ddogfen hon hefyd ar gael yn Gymraeg / This document is also available in Welsh



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Acknowledgement



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1. Introduction

1.1 This Spatial Options background paper builds on and complements the Growth Options background paper. Both papers form part of a set of documents prepared as part of the evidence base for the Powys Replacement LDP (2022 – 2037).

1.2 This background paper has been prepared to set out and consider a range of spatial options.

1.3 Spatial options are key to determining the spatial strategy of an LDP. The Preferred Spatial Strategy generated following the consideration of different spatial options, needs to identify where growth should take place over the plan period. The spatial strategy must clearly communicate where future development will be located, why and how it will deliver the identified Vision, Key Issues, and Objectives of the plan. It needs to be realistic and show a good understanding of the plan area.

1.4 The paper details the necessary contextual analysis that needs to inform the spatial strategy of the Replacement LDP. It does this firstly by outlining the general background of relevant national, regional and local planning policy, guidance and strategies. It then sets out other considerations and evidence, together with stakeholder feedback from the spatial options workshops. The paper then considers the spatial strategy of the Adopted LDP (2011-2026) and details a further three different spatial options that could be undertaken to distribute growth across the Replacement LDP area over the Plan period (2022-2037).

1.5 It is a requirement of the Strategic Environmental Assessment (SEA) Regulations and Sustainability Appraisal requirements, to ensure that reasonable and realistic alternatives have been considered. Each of the spatial options are considered to be reasonable and realistic alternatives and have been assessed within the Integrated Sustainability Appraisal (that incorporates the SEA and SA). A summary of the results are included within this paper to inform the process of selecting the most suitable spatial option for the Powys Replacement LDP area.

1.6 A comprehensive analysis of each of the spatial options is undertaken to identify the positive and realistic aspects of each option, whilst also acknowledging known weaknesses and unsuitable elements of them. The document concludes with a recommendation of which spatial option should be taken forward as the Preferred Spatial Strategy for the Replacement LDP.

2. Policy Context

National Planning Policy

Future Wales: The National Plan 2040

2.1 Future Wales is the National Development Framework for Wales, setting out the direction for development in Wales to 2040. It is the highest tier of development plan in Wales and is focused on solutions to issues and challenges at a national scale. Future Wales sets out where nationally important growth and infrastructure is needed and how the planning system at a national, regional, and local level can deliver it. It provides direction for Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

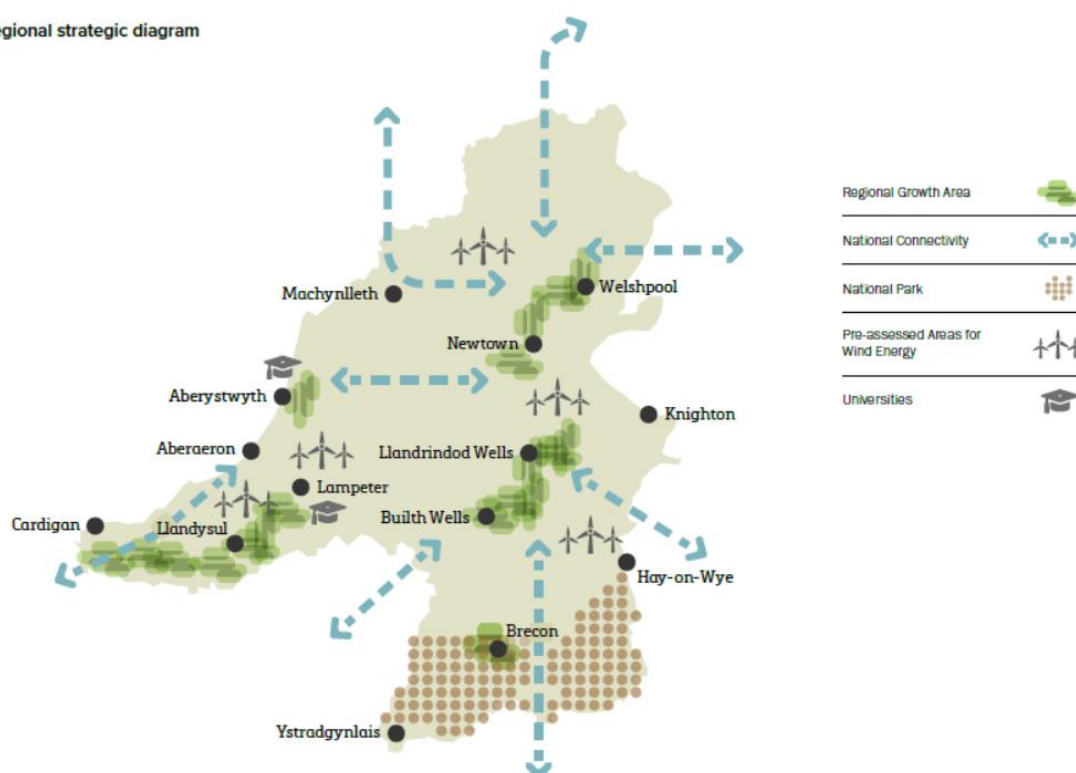
2.2 Future Wales includes a suite of policies which the spatial options of the Powys Replacement LDP need to have regard to and align with, as described below.

Future Wales Policies

Policy 1 - Where Wales will grow – designates Regional Growth Areas, two of the five identified within the Mid Wales Region – The Heart of Wales and Bro Hafren - are located wholly within the Powys LPA area. Policy 1 requires that the Regional Growth Areas will grow, develop and offer a variety of public and commercial services at regional scale. It also requires development in towns and villages in rural areas to be of appropriate scale and support local aspirations and needs.

Figure 1. Future Wales Regional Strategic Diagram

Regional strategic diagram



Source: Future Wales

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking sets out the key placemaking principles that should be considered when determining the location of new development. This includes creating a mix of uses and variety of house types and tenures, building places at a walkable scale with homes, local facilities, and public transport within walking distance and ensuring development is built at appropriate densities with green infrastructure incorporated.

Policy 4 - Supporting Rural Communities – requires LDPs to identify their rural communities, assess their needs and set out policies to support them. It also requires policies to consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.

Policy 5 - Supporting the Rural Economy supports sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through SDPs and LDPs. It requires plans to plan positively to meet the employment needs of rural areas.

Policy 6 – Town Centre First requires that significant new commercial, retail, education, health, leisure, and public service facilities must be located within town and city centres.

Policy 7 - Delivering Affordable Homes reflects Welsh Government's aim to increase the delivery of affordable homes. It requires planning authorities to explore all opportunities to increase the supply of affordable housing and to identify sites for affordable housing led developments.

Policy 8 - Flooding recognises that flood risk is a constraining factor to development and that there are parts of the Regional Growth Areas that are susceptible to flooding. Places that are not at risk of flooding should be prioritised within Regional Growth Areas.

Policy 9 – Resilient Ecological Networks and Green Infrastructure areas and opportunities are required to be identified and included in development plan strategies and policies, in order to promote and safeguard the functions and opportunities they provide.

Policy 12 - Regional Connectivity sets out that LPAs must maximise opportunities arising from the investment in public transport when planning for growth and regeneration. Planning authorities must integrate site allocations, new development, and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.

Policy 25 - Regional Growth Areas Mid Wales identifies Regional Growth Areas in Mid Wales and requires development in these areas to meet the regional housing, employment and social needs of Mid Wales. It identifies two Regional Growth Areas wholly in the Replacement LDP area Bro Hafren and the Heart of Wales, with Brecon and the Border providing important services to some settlements in the South of the plan area.

Policy 26 - Growing the Mid Wales Economy 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 – Movement in Mid Wales requires Local Development Plans to support improved transport links within the region and with other regions and England. LPAs should plan growth and regeneration to maximise the potential opportunities arising from better regional connectivity.

Planning Policy Wales (Edition 12)

2.3 Planning Policy Wales requires that development plans include a spatial strategy covering the lifetime of the plan which establishes a pattern of development for improving social, economic, environmental, and cultural well-being. It states that a balance should be achieved between the number of homes provided and expected job opportunities. As well as ensuring all services needed for the expectant levels of growth are provided, 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. The spatial strategy should be informed by a sustainability appraisal and must form an integral part of an over-arching strategy in the development plan.

2.4 It is a Planning Policy Wales requirement that spatial strategies are consistent with the Key Planning Principles and contribute towards the National Sustainable Placemaking Outcomes. Strategies should be based on approaches that recognise the mutual dependence between town and country, thus improving the linkages between urban areas and their rural surroundings.

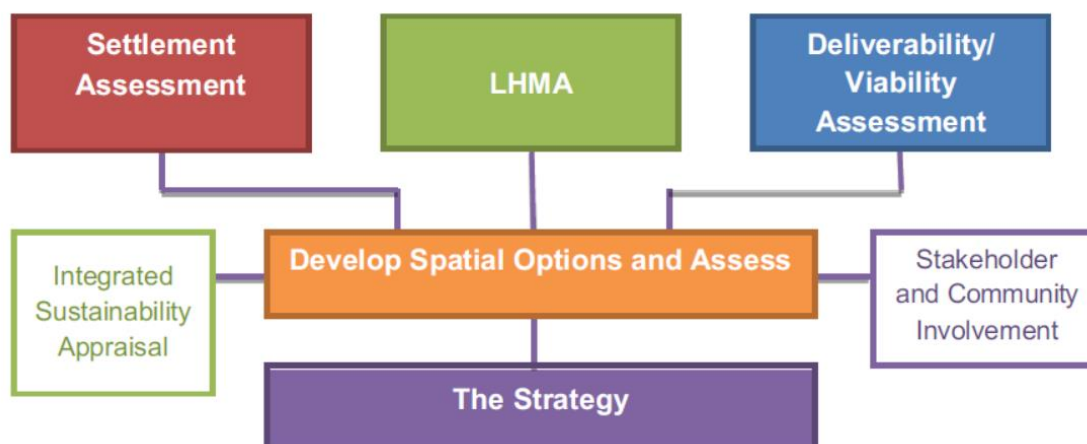
2.5 In the development of spatial strategies, priority must be given to the use of suitable and sustainable previously developed land and/or underutilised land for all types of development. Welsh Government require the evidence to identify suitable areas and sites for development not to be confined by local authority boundaries. They should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself.

Development Plans Manual (Edition 3)

2.6 The Development Plans Manual (DPM) states that the spatial strategy in LDPs “must clearly communicate where future development will be located, why and how it will deliver the vision, key issues and objectives.” This will need to be informed by a robust understanding of the area and the role and function of places as well as an understanding of supply and demand factors within and beyond the local authority boundary.

2.7 The Manual requires the spatial strategy to draw upon a number of key pieces of evidence, such as the settlement assessment, Local Housing Market Assessment (LHMA) and viability assessment, to make informed policy decisions on where to locate development. It requires the strategy to be clearly communicated to all plan users, so it can be delivered in a positive manner. The key elements for developing and assessing spatial options for growth are detailed in Figure 2.

Figure 2. Key Elements for Developing and Assessing Spatial Options for Growth



Source: Development Plans Manual (Edition 3)

2.8 The Manual requires that LPAs consider and assess a number of realistic options for the spatial distribution of development across their area. Taking into consideration factors such as the following:

- Aspirations of the plan (areas for regeneration, wider regional context etc.).
- Availability and suitability of brownfield land in preference to greenfield land and land of high agricultural, ecological or landscape value.
- Minimise the need to travel, especially by private vehicles, through the Sustainable Transport Hierarchy and Active Travel Plans.
- Capacity of existing and potential infrastructure.
- Scale and location of market and affordable housing required.
- Scale and location of employment opportunities.
- Environmental implications, e.g. energy consumption, greenhouse gas emissions, flood risk, biodiversity, green infrastructure, mineral resources and ground conditions, including mine gas.
- Social and cultural factors, including consideration of the Welsh language.
- Accessibility to jobs, shops and services.
- Understand how different market areas can affect the viability of delivering private and affordable housing as well as associated infrastructure to support the level of development proposed.
- Deliverability of key sites and overall strategy.
- National strategies and priorities, such as decarbonisation and health.

Technical Advice Note (TAN) 20: Planning and the Welsh Language

2.9 Technical Advice Note (TAN) 20 requires LPAs to consider the Welsh language in the preparation of LDPs. At the strategic options and Preferred Strategy stage, consideration should be given to strategic approaches which may support the Welsh language. This may include:

- Positive promotion of local culture and heritage.
- Planning the amount and the spatial distribution of new development and infrastructure, particularly where this would help to support community sustainability.
- Phasing of strategic housing and employment developments.

- Identifying areas of linguistic sensitivity or significance.
- Directing strategic sites to communities where the evidence suggests the likely impact on the use of the Welsh language is positive.
- Developing mitigation measures if evidence suggests the likely impact on the Welsh language is negative.

Llwybr Newydd - The Wales Transport Strategy 2021

2.10 Llwybr Newydd - The Wales Transport Strategy (2021), sets out the Welsh Government's vision for how the transport system can help deliver on Welsh Government priorities. 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 three headline priorities set out within the Transport Strategy are:

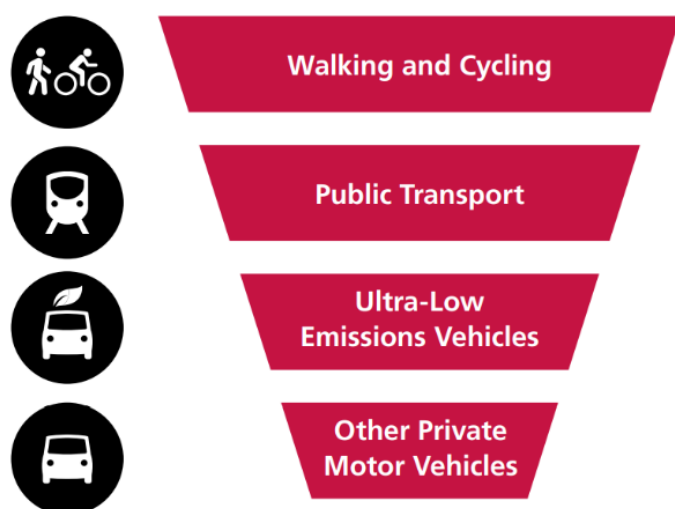
- **Priority 1:** bring services to people in order to reduce the need for people to use their cars on a daily basis.
- **Priority 2:** accessible, sustainable and efficient transport services and infrastructure.
- **Priority 3:** behaviour change.

2.11 The Transport Strategy requires governments, local authorities, transport providers (both commercial and third sector) and stakeholders in other policy areas to work together to ensure that transport contributes to the current and future well-being of Wales.

2.12 Targets set out in the Wales Transport Strategy, include having 45% of journeys being made by walking, cycling and public transport by 2040, with interim targets of 35% by 2025 and 39% in 2030 (the 2021 baseline is 32%). The Transport Strategy also aims to have a 10% reduction in car miles travelled by 2030.

2.13 The Transport Strategy sets out a sustainable transport hierarchy to inform decisions about new infrastructure:

Figure 3. Sustainable Transport Hierarchy



Source: Llwybr Newydd - The Wales Transport Strategy (2021)

Regional Context

Mid Wales Growth Deal

2.14 In 2017, the Mid Wales Region was invited by both the UK Government and Welsh Government to develop a Growth Deal. The Growth Deal plays a key role alongside a range of other strategies and investments from the public and private sector to bring prosperity to the communities and businesses of the region.

2.15 The Growth Deal is being brought forward in the form of a Portfolio. In September 2021, the Growing Mid Wales Board approved the Portfolio Business Case. The Portfolio's framework for the Growth Deal and initial set of Programmes and Projects were reviewed by the UK and Welsh Government. This Portfolio 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.

2.16 Other regional programme and projects aim to boost the following Strategic Growth Priority areas:

- Applied Research and Innovation
- Agriculture, Food and Drink
- Strengthened Tourism Offer
- Digital
- Supporting Enterprise

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

2.18 The proposals set out to Government demonstrate the potential outcomes that are achievable in Mid Wales by 2032, through Growth Deal investment:

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

Growing Mid Wales Partnership

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

2.20 In May 2020, the Partnership published 'A Vision for Growing Mid Wales Strategic Economic Plan and Growth Deal Roadmap'. It includes an economic strategy for Mid Wales

and outlines a vision of how the Partnership want to see the Mid Wales' economy grow as a place to live, work and visit over a 15-year period (2020 – 2035). It sets out regionally agreed priorities that will establish a framework and conditions for future investment, based on detailed evidence and understanding of the needs of businesses and residents within the region. The Plan will be delivered through a range of funding opportunities including the Mid Wales Growth Deal.

Mid Wales Area Statement (March 2020)

2.21 The Environment (Wales) Act 2016 required Natural Resources Wales (NRW) to prepare and publish regional statements, referred to as “Area Statements”, for the areas of Wales that it considers appropriate for the purpose of facilitating the implementation of the national Natural Resources Policy. Area Statements outline the key challenges facing the respective region, what collectively can be done to meet those challenges, and how natural resources can be better managed for the benefit of future generations.

2.22 The Powys LPA area is within the region covered by the Mid Wales Area Statement, which also includes the LPA areas for Ceredigion and BBNP (within Powys). 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.

2.23 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 Replacement LDP and when fulfilling the LPA's duty to maintain and enhance biodiversity in exercising its planning functions.

Mid Wales Corporate Joint Committee

2.24 The Local Government and Elections (Wales) Act 2021 (January 2021) created four mandatory Corporate Joint Committees (CJCs) covering the four regions of Wales. CJCs are responsible for strategic development planning, regional transport planning and promoting the economic well-being of their area. The Mid Wales CJC covers Ceredigion, Powys including the area of the BBNP within Powys.

2.25 The CJC has consulted on a Draft Corporate Plan which sets out the following vision for 2022-2027:

‘Mid Wales will be a region that enables and encourages sustainable, environmentally friendly, and inclusive places to live, where residents have access to plentiful employment opportunities, culturally rich and diverse communities, and high-quality education, skills, and training. The Local Authorities will collaborate strategically on matters relating to the economy, transport and strategic planning.’

2.26 It is intended that the Vision will function as an overarching principle by which regional matters relating to the Economy, Transport and Strategic Planning will be developed for the future.

Local Context

Powys County Council Corporate Plan (February 2023)

2.27 The Corporate and Strategic Equality Plan 2023-2027 sets out the well-being priorities for Powys County Council and actions needed to deliver them over the five-year period. The plan includes the following ambitions:

Stronger – Powys will become a County that succeeds together, with communities and people that are well connected socially and are personally and economically resilient.

Fairer – Powys County Council will be an open well-run Council, where people's voices are heard and help to shape the Council's work and priorities, with fairer, more equal, access to services and opportunities. The Council will work to tackle poverty and inequality to support the well-being of the people of Powys.

Greener – Powys County Council want to ensure a greener future for Powys, where well-being is linked to that of the natural world, and the response to the climate and nature emergencies is at the heart of everything the Council does.

2.28 The objectives, detailed in the Corporate Plan, focus on areas for the Council to improve or develop to make people's lives better, both as individuals and as communities. The core aims of the Plan are:

1. To improve people's awareness of services, and how to access them, so that they can make informed choices.
2. To support good quality, sustainable, employment, providing training opportunities, and pursuing real living wage employer accreditation.
3. To work to tackle poverty and inequality to support the well-being of the people of Powys.

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

2.29 Powys County Council declared a climate emergency on 24th September 2020. This included an ambition to reduce its carbon emissions to net zero, in line with the Welsh public sector target of 2030.

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

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

Nature Emergency (October 2022)

2.31 A motion to declare a Nature Emergency was approved at the Full Council meeting on 13th October 2022. It was resolved to:

1. Declare a Nature Emergency as demonstration of the Council's commitment to protecting and rejuvenating Powys' natural environment for its inherent value, for the role nature plays in achieving a vibrant and viable economy and for the benefits nature provides to the wellbeing of our county's residents.
2. Establish meaningful supportive structures that embed nature in decision making.
3. Take meaningful action to help achieve a net increase in nature county-wide.

3. Considerations for Preparing Spatial Options and Determining a Spatial Strategy

3.1 In addition to the strategies, priorities, policies and aspirations set out in national, regional and local plans, the following need to be taken into consideration when formulating the spatial options and ultimately the preferred strategy:

- **Aspirations of the Replacement LDP (Vision and Objectives)**
- **Regional Context**
- **Adopted Powys LDP (2011-2026)**
- **Settlement Hierarchy and Clusters**
- **Key Evidence:**
 - ❖ Local Housing Market Assessment
 - ❖ Employment Needs Assessment
 - ❖ Town Centre Retail Hierarchy
 - ❖ Viability
 - ❖ Flood Risk
 - ❖ Phosphorus Sensitive River Special Area of Conservation (SAC) catchments
 - ❖ Brownfield First and Best and Most Versatile Agricultural Land
 - ❖ Welsh Language
 - ❖ Location of Housing Land Supply
 - ❖ Candidate Sites
- **Stakeholder Feedback**
- **Growth Options**

Aspirations of the Replacement LDP (Vision and Objectives)

3.2 The role of the spatial strategy will be to help achieve the identified Vision of the Replacement LDP. The Vision has been set to address the Key Issues facing the Powys LPA area and to deliver on the aspirations of stakeholders. To implement the Vision a series of Objectives have been developed. The Key Issues, the Vision and the Objectives for the Replacement LDP are detailed in full in the Key Issues, Vision and Objectives (KIVO) background paper.

3.3 The Objectives that the Spatial Strategy needs to consider are:

Objective 1 – Climate Change

Objective 2 – Nature Recovery

Objective 3 – Natural, Historic, and Built Environments

Objective 4 – Mineral Resources

Objective 5 – Sustainable Travel

Objective 6 – Placemaking

Objective 7 – Sustainable Growth

Objective 8 – Health and Well-being

Objective 9 – Sustainable Settlements and Communities

Objective 10 – Meeting Future Needs

Objective 11 – Welsh Language

Objective 12 – Housing Needs

Objective 13 – Community Facilities and Assets

Objective 14 – Vibrant Economy

Objective 15 – Economic Development

Objective 16 – Mid Wales Growth Deal

Objective 17 - Tourism

Objective 18 – Town Centres

Objective 19 – Infrastructure, Utility and Service Provision Required for New Development

Objective 20 – Provision of Infrastructure and Digital Connectivity Projects

Objective 21 – Energy and Decarbonisation

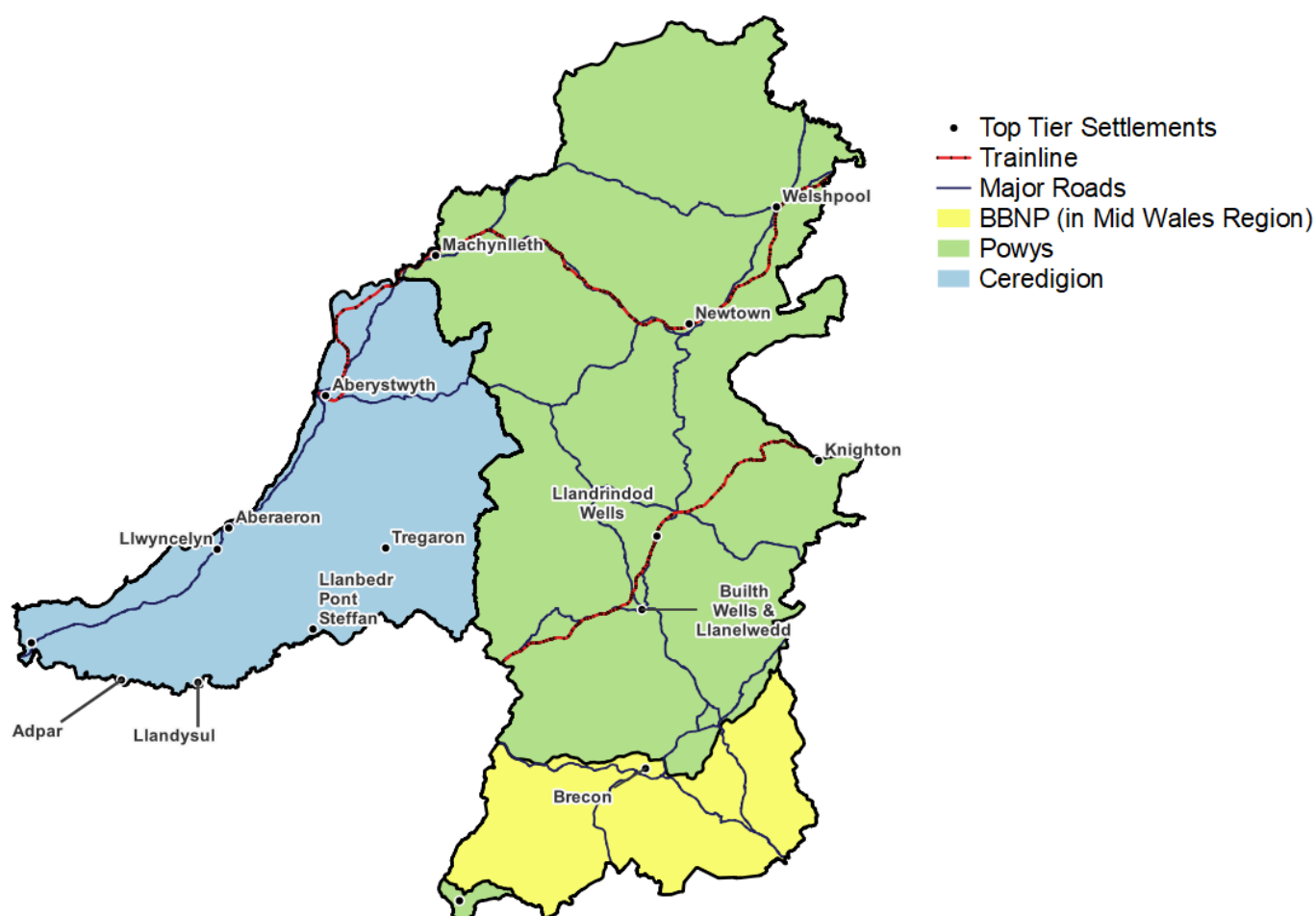
Objective 22 – Waste

Regional Context

3.4 Future Wales has introduced a new perspective that all LDPs must embrace, that of how each LDP sits within the region as a whole and the relationship to other LDPs. In essence it requires a strategic approach to planning in advance of the formal commencement of SDPs. LPAs are required to understand how the level of growth proposed is complementary to neighbouring authorities and to ensure key investment decisions support the Regional Growth Areas and the wider region.

3.5 The Mid Wales Region as set out in Future Wales, comprises Ceredigion, Powys and the area of the BBNP within Powys. Figure 4 shows the highest tier settlements (LDP data) across the Mid Wales Region, together with the trainlines and major roads connecting them.

Figure 4. The Mid Wales Region.



3.6 Future Wales supports sustainable growth and development in a series of inter-connected towns across the region. Policy 25 in Future Wales details five Regional Growth Areas (Figure 1). Development in these Regional Growth Areas should meet the regional housing, employment and social needs of Mid Wales.

3.7 The Regional Growth Areas are:

- The Teifi Valley, including Cardigan, Newcastle Emlyn, Llandysul and Lampeter
- Brecon and the Border
- The Heart of Wales, including Llandrindod Wells and Builth Wells
- Bro Hafren, including Welshpool and Newtown
- Aberystwyth

3.8 The Welsh Government supports development in all parts of the region in meeting local needs. SDPs and LDPs are required to determine the most appropriate locations for growth in Mid Wales and must demonstrate how a regional approach has informed decisions on future growth.

3.9 Aberystwyth is recognised in Future Wales as the largest town in the region hosting a range of important services, including the University and Bronglais General Hospital. The town is considered to be in a strategic location and provides a centre for national institutions, including the National Library of Wales. Aberystwyth is also the main hub for public transport in the region and a key employment and administrative centre. To the north of Aberystwyth, Machynlleth in the Powys LPA area, is considered to be a vital link to the North Wales region and an important centre where smaller settlements along the Cardigan Bay coast gain access to key services.

3.10 Bro Hafren is the area in the upper reaches of the River Severn, where towns including Welshpool, Newtown (the region's second largest town) and Llanidloes are important and vibrant centres. The Teifi Valley in the south-western part of the region overlaps the South West region and includes the market towns of Tregaron, Lampeter, Llandysul, and Cardigan. It provides connecting infrastructure that is used and relied on by the resident population and the communities around them.

3.11 The Heart of Wales towns include Llandrindod Wells, Builth Wells and Rhayader and are historically significant places, forming part of a network of spa towns in Mid Wales. Builth Wells and Llanellwedd are considered to be the epicentre of the Welsh agricultural sector, hosting the annual Royal Welsh Show.

3.12 The towns of Knighton and Presteigne bordering England, are recognised for providing important roles as local centres of employment and services with strong links to the English Marches. Brecon is linked by the A470 to Merthyr Tydfil and the wider South East Wales region and also has strong local links with Hay on Wye, Talgarth and Crickhowell to the east. Ystradgynlais is the link between Mid Wales and the industrial Swansea and Neath Valleys. Tourism is central to the area's economy with visitors from around the world drawn to the natural landscape which includes the Black Mountains and Brecon Beacons.

3.13 Future Wales recognises that the most resilient ecological networks are in the most southerly and northerly parts of the region and in the south west of the region. However, Future Wales does consider that these networks may not be as resilient as they ought to be. It notes that whilst there are biodiversity hotspots, carbon stores, woodland and forestry in the heart of the Mid Wales region, improvement in the overall resilience of the region is needed. The role of the BBNP is recognised in Future Wales, as a node for improving resilience and deriving multiple benefits from green infrastructure, which should be maximised along with the role of designated nature conservation sites.

Adopted Powys LDP (2011-2026)

The Adopted LDP Strategy

3.14 The over-arching Strategy of the Adopted Powys LDP (2011-2026) sets out to achieve the adopted Plan's Vision and Objectives. It is described within the Adopted 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.”

3.15 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 settlement hierarchy which consists of:

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

3.16 The Adopted LDP 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.

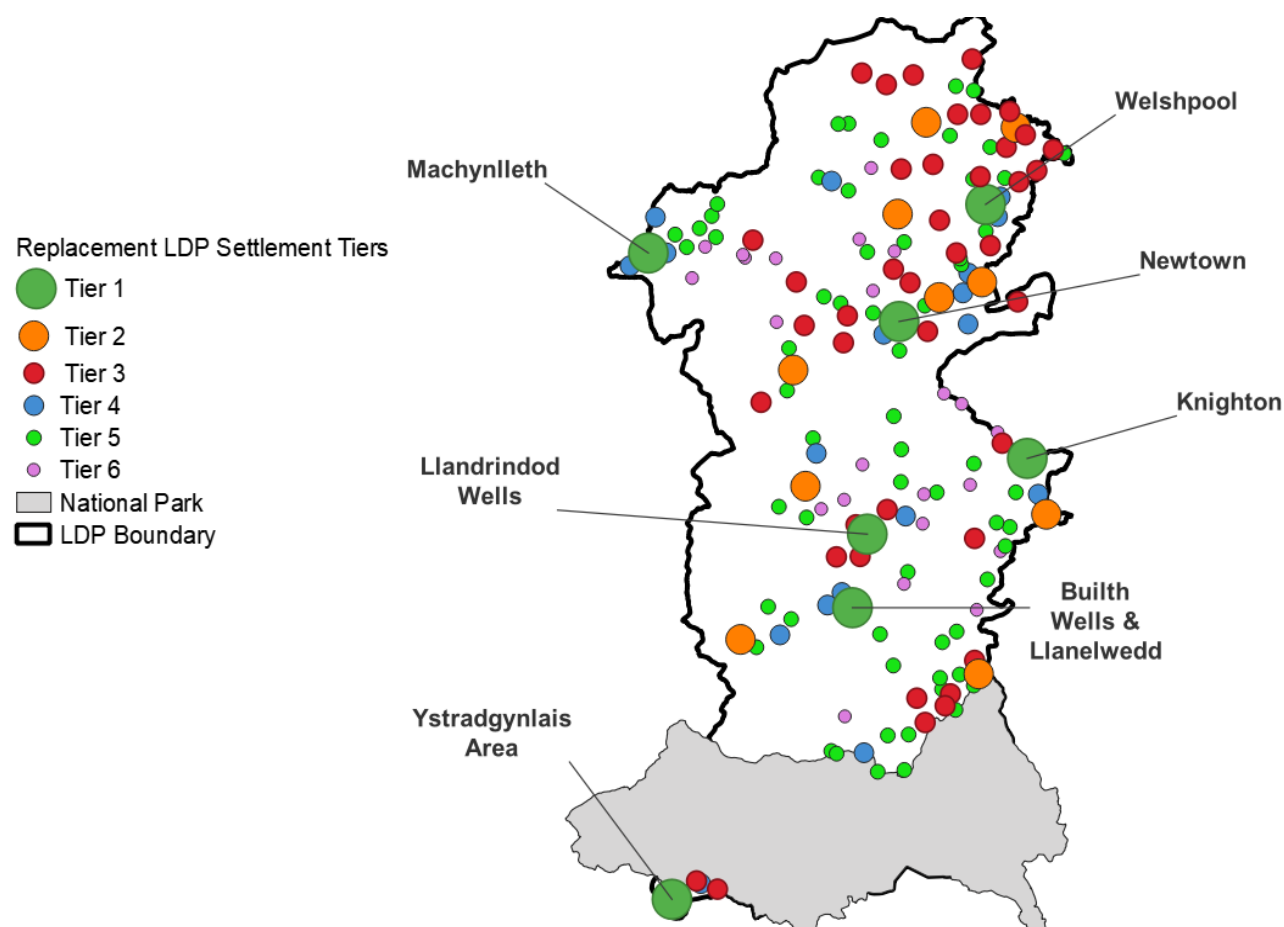
3.17 Whilst it is considered in the Review Report and ongoing Annual Monitoring Reports, that development permitted has generally been in accordance with the spatial strategy of the Adopted LDP, the evidence supporting the settlement hierarchy has been reviewed. This has been done to enable the Replacement LDP to give full consideration to Regional Growth Areas and changes to national policy. Greater emphasis is now given to the role of the transport hierarchy and the principles of placemaking in national policy than was the case back in 2015, when the deposit plan for the Adopted LDP was drafted. Reviewing the settlement hierarchy, enables the Replacement LDP to be better aligned to updated Welsh Government and Future Wales requirements.

3.18 Consequently, as detailed in Section 3, a revised settlement hierarchy has been identified consisting of Tier 1 to 6 settlements. When this is considered with the use of spatial settlement clusters and defined Regional Growth Areas and Rural Areas, it leads to a different strategy for the Replacement LDP. The analysis of the spatial options in Section 4, considers what elements of the Adopted LDP strategy have worked well and should be continued, as the overall aim will still be to guide and distribute development to sustainable locations whilst protecting important strategic resources and assets.

Regional Growth Areas, Local Clusters, Rural Areas and the Settlement Hierarchy

3.19 The Settlement Assessment and the Small Settlement Assessment Replacement LDP background papers reviewed the settlement hierarchy identified in the Adopted Powys LDP (2011 to 2016). This included looking at the sustainability, role and function of all the settlements identified in the Adopted LDP settlement hierarchy. In total 162 settlements were assessed and categorised into six tiers, with the most sustainable settlements providing a wide range of services and sustainable transport opportunities categorised as Tier 1 settlements those with the least access to services and sustainable transport opportunities as Tier 6 settlements, as shown in Figure 5.

Figure 5. Replacement LDP Settlement Hierarchy



3.20 Following the Settlement Assessment and the Small Settlement Assessment, further analysis was considered necessary to determine the distribution of growth in the Replacement LDP to reflect the diversity and geographic scale of the LDP area and to meet the needs of local communities. Linking settlements via clusters was determined to be the best way to achieve this.

3.21 There is a strong emphasis in Planning Policy Wales towards placemaking. Therefore, considering geographical clusters for the settlement framework for the LDP area is an approach that recognises the role and function that settlements play at a wider plan level and local level, and within their own respective cluster. In this sense, the provision of

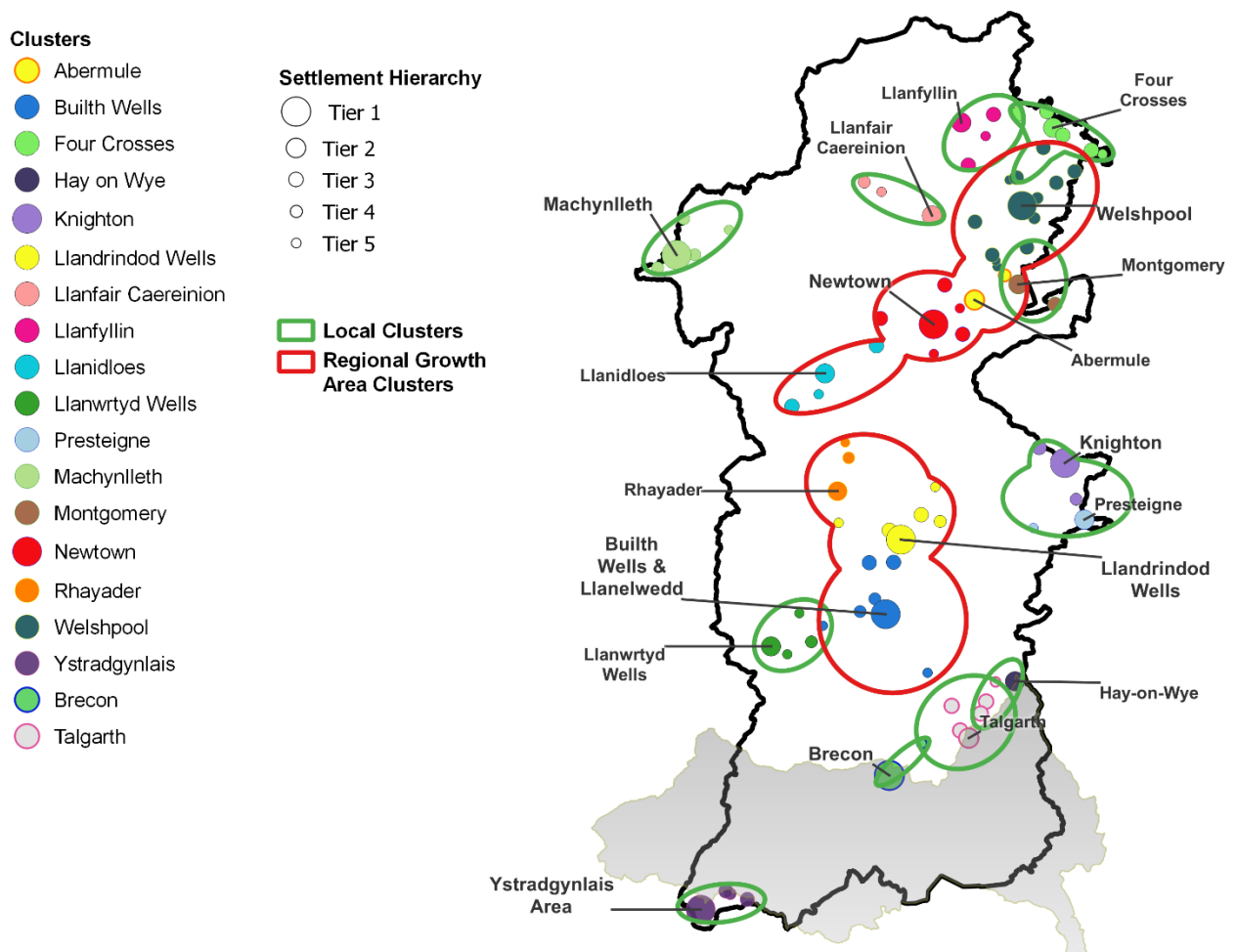
growth and the allocation of settlements to each cluster is responsive to each settlement’s needs and builds upon the diverse nature of local communities.

3.22 The Cluster Analysis background paper details the methodology used to identify settlement clusters, which was based on the National Planning Policy and the National Sustainable Placemaking Outcomes. Whereas in some cases distinct clusters were able to be identified, there were cases, particularly within the Regional Growth Areas, where clusters overlapped to form a larger cluster area.

3.23 Clusters have been categorised as either ‘Regional Growth Area Clusters’ or ‘Local Clusters’ to be able to facilitate growth in accordance with the policy requirements in Future Wales, as shown in Figure 6. Tier 6 settlements and any other settlements that did not have a functional relationship with either a Tier 1 or 2 settlement, acting as a service centre, were excluded from the clusters.

3.24 When determining the settlement clusters, consideration was given to whether any settlement had a functional relationship (in accordance with the criteria used) with other large settlements, acting as service centres, in neighbouring authority areas. The results concluded that there are several Tier 3 settlements that cluster with Talgarth, in the BBNP and one Tier 5 settlement that clusters with Brecon.

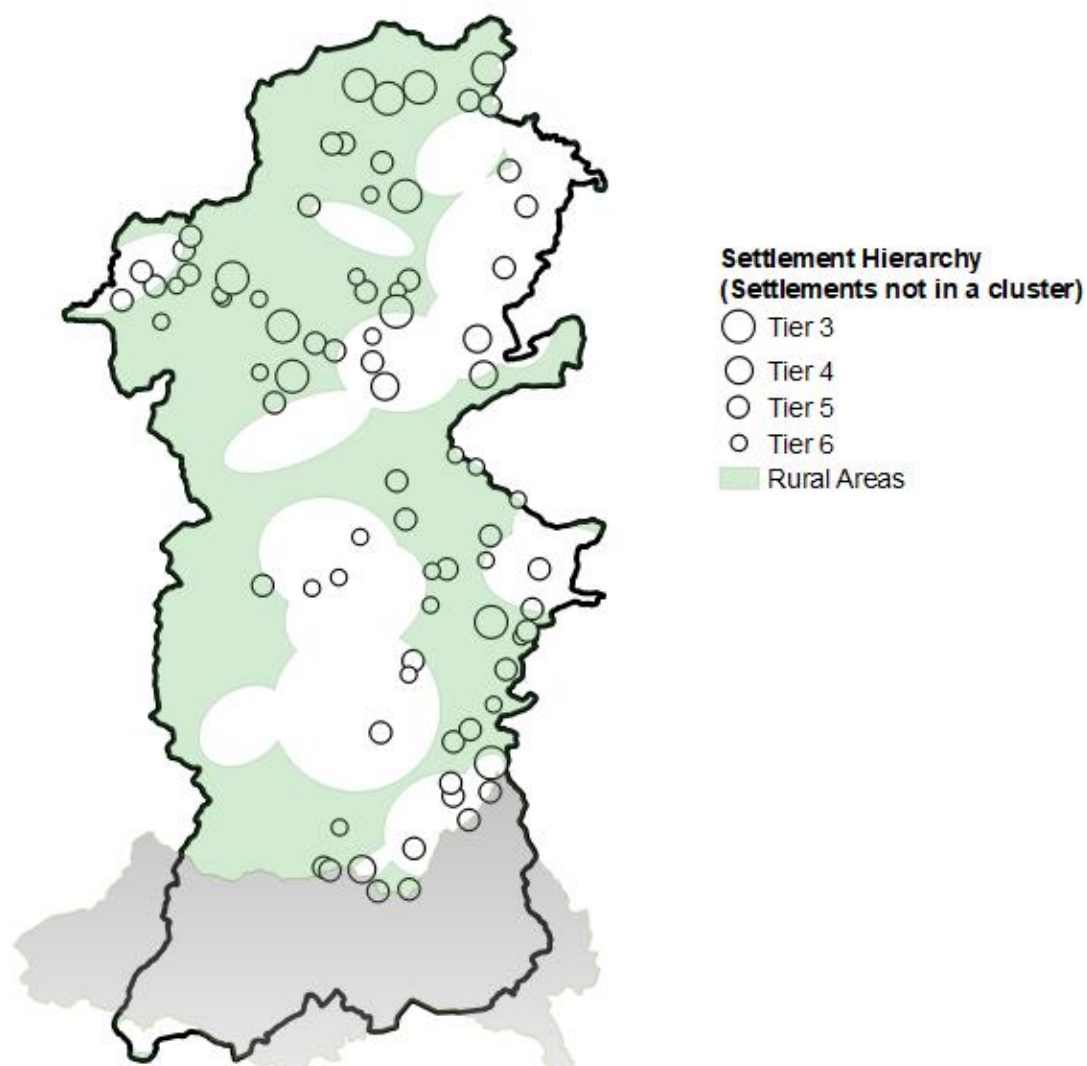
Figure 6. Replacement LDP Settlement Clusters



Note: The settlements of Brecon and Talgarth are NOT located within the Powys Replacement LDP area but are within the BBNP.

3.25 Additionally, Future Wales requires development plans to identify their rural communities to assess their needs and set out policies that support them. The Rural Approach background paper considered the best way for identifying rural communities. The paper concluded that the best approach was to consider that all settlements that lie outside of the settlement clusters, as identified within the Cluster Analysis paper, were to be considered as Rural as shown by Figure 7.

Figure 7. Rural Areas and Non-Cluster Settlements



3.26 The findings from the Settlement Assessment, Small Settlement Assessment, Cluster Analysis and the Rural Approach background papers need to be reflected in the spatial options. The spatial options should direct development to those areas most sustainable and appropriate to accommodate growth, taking into consideration Future Wales policies regarding focusing growth into Regional Growth Areas and addressing the needs of Rural communities. Development in the Open Countryside and in lower tier settlements will be limited. The different spatial options give consideration to the balance that should be struck

between directing growth across the three spatial areas identified - Regional Clusters, Local Clusters and Rural Areas - in the context of the Housing Market Areas identified in the Local Housing Market Assessment and Commercial Market Areas identified in the Employment Needs Assessment.

3.27 The following section sets out the settlement hierarchy that should be used to formulate where growth could sustainably be located and to determine which settlements are the most suitable and able to accommodate growth over the Replacement LDP plan period (2022-2037).

Replacement LDP Settlement Hierarchy

3.28 Table 1 details the proposed sustainable settlement hierarchy for the Replacement LDP. Settlements in the top three tiers are the most sustainable for accommodating growth (all these settlements are classified as either Towns or Large Villages, the top two tiers in the settlement hierarchy of the Adopted Powys LDP (2011-2026)). Lower tier settlements within a Regional Growth Area or Local Cluster, that have a functional relationship with the Tier 1 or Tier 2 settlement, may be able to accommodate limited growth that supports the higher tier settlement and address a recognised need.

3.29 Growth within settlements identified as Rural / Non-Cluster settlements should be focussed on addressing identified needs and supporting sustainable rural communities.

Table 1. Replacement LDP Settlement Hierarchy

	Regional Growth Area Cluster	Local Cluster	Rural / Non-Cluster Settlement
Tier 1	Builth Wells & Llanelwedd Newtown Welshpool Llandrindod Wells	Machynlleth Knighton Ystradgynlais Area	
Tier 2	Abermule Llanidloes Rhayader	Hay-on-Wye Four Crosses Llanfair Caereinion Llanfyllin Llanwrtyd Wells Montgomery Presteigne	
Tier 3	Arddleen Berriew Bettws Cedwain Caersws Castle Caereinion Crossgates Forden and Kingswood	Abercrave Boughrood & Llyswen Bronllys Churchstoke Coelbren Crew Green	Carno Clyro Llanbrynmair Llangynog Llanrhaeadr-ym-Mochnant Llansilin New Radnor

	Regional Growth Area Cluster	Local Cluster	Rural / Non-Cluster Settlement
	Guilsfield Howey Kerry Llandinam Llangurig Llanyre Middletown Newbridge on Wye Trewern	Glasbury Knucklas Llandrinio Llanfechain Llansantffraid-ym-Mechain Llanymynech Meifod Three Cocks	Penybontfawr Pontrobert Trefeglwys Tregynon
Tier 4	Builtl Road Cilmerly Leighton Pentre Penybont St Harmon Welshpool Buttington	Caehopkin Caerhowel Derwenlas Esgairgeiliog Ceinws Llangadfan Llangammarch Wells Norton Penegoes	Llanddew Llandyssil Sarn Stepside
Tier 5	Aberbechan Cwmbelan Dolfor Erwood Felinfach Garth Garthmyl Groes-lwyd Llandewi Ystradenni Llanwrthwl Pant y dwr Refail	Beulah Bwlch-y-cibau Cefn Gorwydd Coedway Glantwymyn Kinnerton Llanerfyl Llowes	Abercegir Aberedw Aberhafesp Abertridwr Adfa Battle Cemmaes Clatter Commins Coch Cradoc Cwm Linau Cwmbach Elan Village Evenjobb Ffynnon Gynydd Foel

	Regional Growth Area Cluster	Local Cluster	Rural / Non-Cluster Settlement
			Forge Frank's Bridge Fron Bank Gladestry Groesffordd Llanbadarn Fynydd Llanbister Llanfihangel Llanfihangel Tal-y-llyn Llanfilo Llangedwyn Llangunllo Llanigon Llanwddyn Llanwnog Llanwrin Manafon Painscastle Pen-y-bont Llanerch Emrys Pool Quay Rhosgoch Sarnau , Mont. Tanhouse Velindre (Brecknock) Walton Whitton Y Fan

3.30 The following Tier 6 settlements are considered as unsustainable settlements that are not suitable to accommodate growth. The spatial options should not encourage development within these settlements.

Table 2. Tier 6 Least Sustainable Settlements

Tier 6 Settlements
Abbeycwmhir, Beguildy, Bleddfa, Bwlch-y-ffridd, Cefn Coch, Darowen, Dolanog, Dolau Felindre, Hundred House, Llan, Llandegley, Llawr-y-glyn, Lloyney, Lower Chapel, Nantglas Nantmel, New Mills, Newchurch, Old Radnor, Talerddig

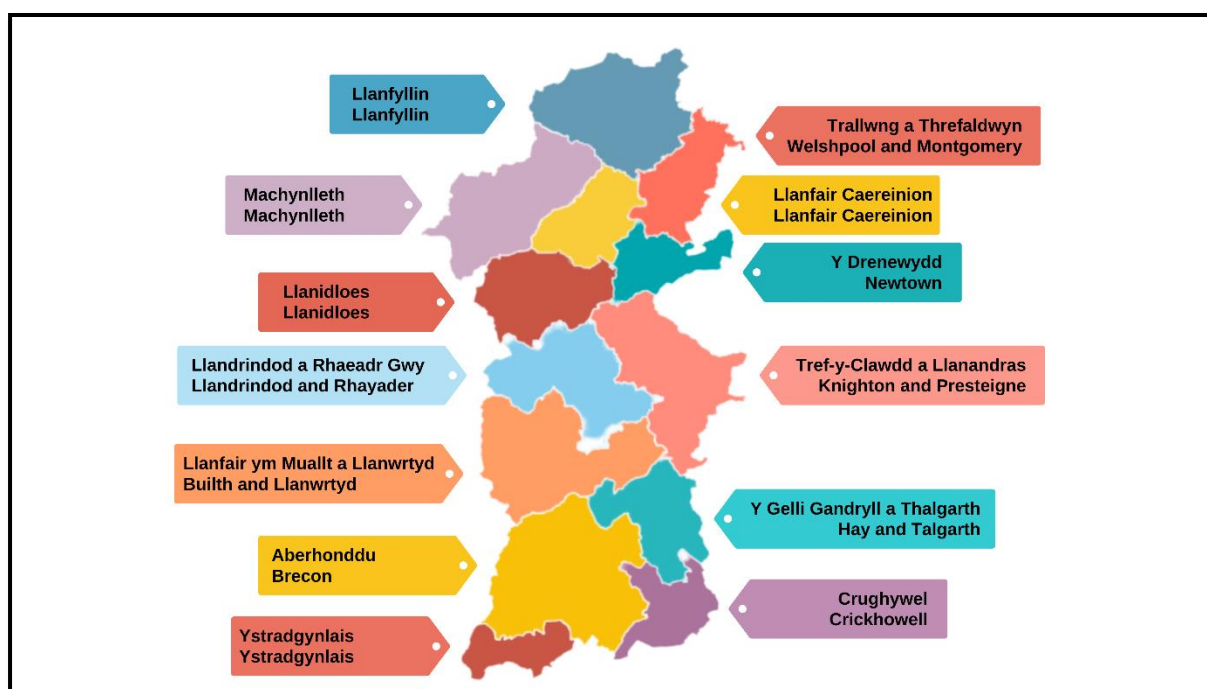
3.31 The settlement hierarchy is crucial in preparing the spatial options, helping to identify the most appropriate locations to accommodate future development to achieve a sustainable pattern of growth, minimise unsustainable patterns of movement and support local services and facilities. Therefore, the settlement hierarchy and Regional and Local Clusters, together with the identified Rural areas will be taken into account when considering the spatial options.

Key Evidence

Local Housing Market Assessment (2024)

3.32 The Local Housing Market Assessment (LHMA) undertaken in 2024, for the period 2022-2037, is an essential part of the evidence base for the Replacement LDP. It identifies the level of housing need for both open market and affordable dwellings across the whole of Powys (including BBNP) and also for 13 individual Housing Market Areas (HMA) at the local level as identified in Figure 8.

Figure 8. Housing Market Areas



3.33 The LHMA has been undertaken using the Welsh Government toolkit and considered existing unmet affordable housing need from the Common Housing Register (social housing need) and the Tai Teg Affordable Housing Register (intermediate housing need), whilst also using the 2018 household projections, published by the Welsh Government, to estimate newly arising need.

3.34 Table 3 shows estimates of housing need across the Housing Market Areas, for the higher variant household projection (the preferred variant used in the LHMA) over the Replacement LDP Plan period. A conversion factor to address a 10% vacancy rate has been applied in accordance with the Vacancy Rate background paper. The LHMA identifies need across the whole of Powys including BBNP, Table 3 however only details the data for the Powys LPA area.

Table 3. Level of Housing Need in Powys LPA Area, for both Open Market and Affordable Dwellings by Housing Market Area, 2022-2037

Housing Market Area (excludes areas in BBNP)	Affordable Social	Affordable Intermediate	Total affordable	Total Open Market	Total
Brecon	27	6	33	33	66
Builth and Llanwrtyd	60	11	71	115	186
Crickhowell	2	1	3	5	9
Hay and Talgarth	23	22	45	66	111
Knighton and Presteigne	73	25	98	152	250
Llandrindod and Rhayader	42	32	74	223	297
Llanfair Caereinion	51	16	67	84	152
Llanfyllin	54	34	87	131	218
Llanidloes	29	19	48	100	148
Machynlleth	41	21	62	94	156
Newtown	82	39	121	255	376
Welshpool and Montgomery	125	90	214	260	474
Ystradgynlais	91	20	110	128	238
Powys LPA Area	700	337	1036	1646	2682

3.35 It should be noted that the LHMA is only one source of evidence relating to housing need. Housing waiting lists are continually updated and the needs of areas change over time. The spatial options need to consider the needs identified in the LHMA and the latest numbers on housing waiting lists. Additionally, the spatial options need to include sufficient flexibility to respond to changing needs across the whole of the Replacement LDP plan area, up to 2037.

Employment Needs Assessment (2024)

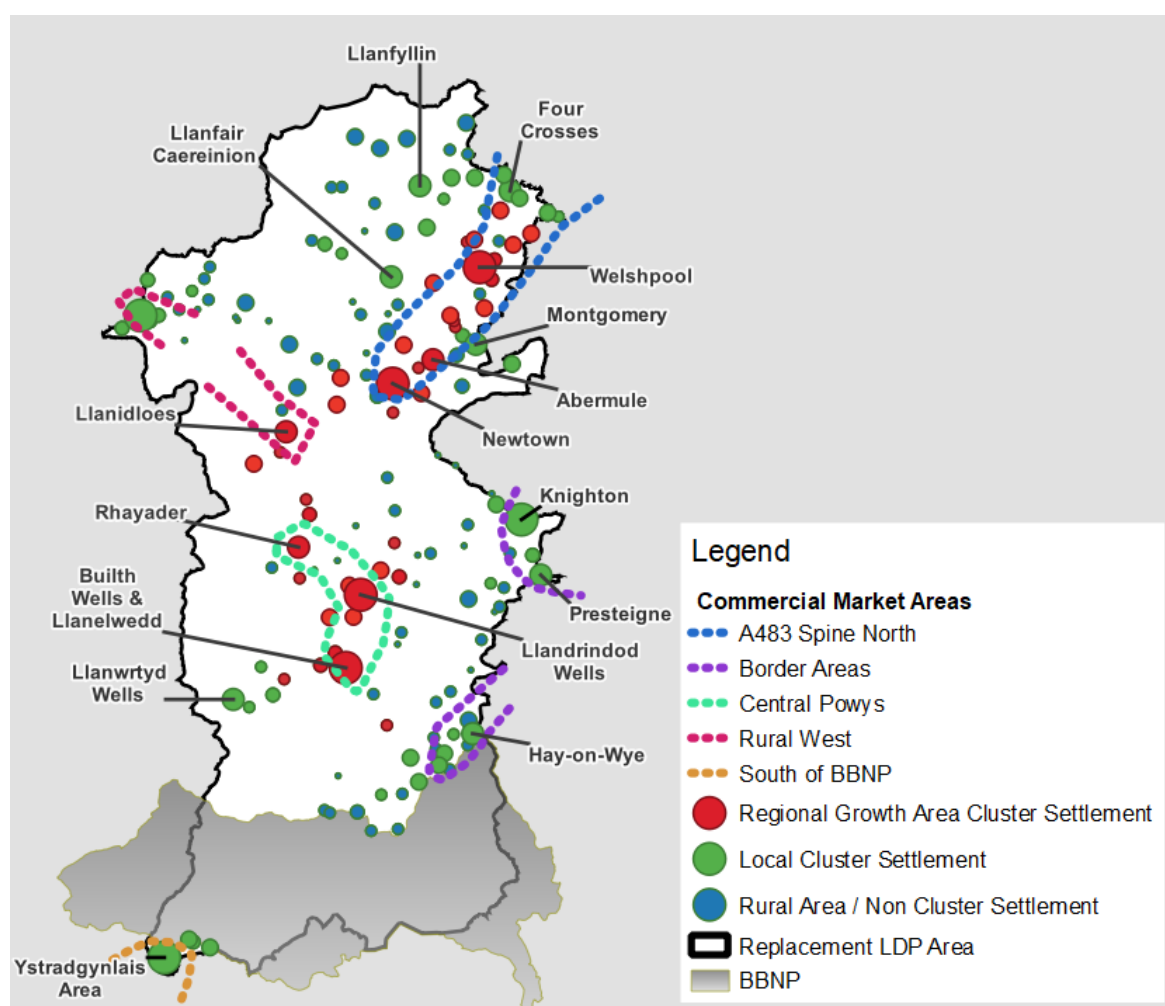
3.36 The Employment Needs Assessment undertaken by BE Group and Per Consulting, provides an assessment of the supply and demand for employment land in the Powys Replacement LDP area. It looked at the available employment allocations and existing employment areas to understand the supply side and reviewed the property market, whilst consulting with local stakeholders and forecasting employment growth, to understand the demand side.

3.37 Planning Policy Wales (Edition 12) requires that LPAs should provide well connected employment sites which reduce the need to travel and support sustainable economic development. Informed by this national guidance, the Employment Needs Assessment has identified five Commercial Market Areas, Figure 9.

3.38 The five identified Commercial Market Areas are:

- A483 Spine
- Rural West
- Central Powys
- Border Areas
- South of BBNP (Ystradgynlais)

Figure 9. Commercial Market Areas shown with the Settlements in the Sustainable Settlement Hierarchy



3.39 The Employment Needs Assessment recommends that the five Commercial Market Areas, which are focussed on Tier 1 and some Tier 2 settlements, should be the focus for the provision of new allocated employment land to support “B Class” land uses. The Commercial Market Areas therefore need to be included within the spatial options.

Town Centre Retail Hierarchy

3.40 The evidence informing the retail component of the Adopted LDP has been reviewed in a two-part study, as part of the background evidence for the Replacement LDP. The first part of the study, undertaken by Owen Davies Consulting and Chilmark Consulting, in 2023, provided details of the main centres in Powys and considered the changing retail and economic pressures they are experiencing. It advised on an appropriate approach to the town centre strategy for the Replacement LDP plan area, that will build on identified opportunities and manage change in a positive way for the local communities and the centres they serve.

3.41 The study reviewed the Adopted Powys LDP (2011-2026) town centre hierarchy, taking into consideration the latest national planning policy and guidance, together with the scale and diversity of the town centres in the plan area. It was considered that the approach taken in the Adopted LDP, with regards to the retail hierarchy was generally robust, but would benefit from an update to align with other LDP retail hierarchies in the Mid Wales Region. Table 4 includes the revised town centre retail hierarchy for the Replacement LDP.

Table 4. Replacement LDP Town Centre Retail Hierarchy

Hierarchy	Town Centre
Sub Regional Centre	Newtown
Primary Town	Welshpool Llanidloes Llandrindod Wells Machynlleth Builth Wells
Secondary Town	Rhayader Knighton Ystradgynlais Presteigne
Local Town	Llanfyllin Montgomery Llanfair Caereinion Llanwrtyd Wells

Viability

3.42 An initial High-Level Viability Assessment has been undertaken (a formal High Level Viability Assessment will be undertaken at the deposit plan stage as required by Planning Policy Wales) which provides a general viability review of residential development across the Replacement LDP plan area and examines the potential barriers to development. It also assists in the consideration of where (and at what level) the provision of affordable housing can be anticipated.

3.43 This initial assessment considers viability levels for each of the Housing Market Areas, as detailed in the LHMA. It determines which of the Housing Market Areas are considered to be Low or High Viability Areas. The assessment then considers the percentage of affordable housing contributions that can be expected from residential sites of varying sizes for the High and Low Viability Areas.

3.44 The assessment identified the following Housing Market Areas as High Viability Areas (Figure 10):

- Brecon
- Crickhowell
- Hay and Talgarth
- Knighton and Presteigne
- Llandrindod and Rhayader
- Llanfyllin
- Newtown
- Welshpool and Montgomery
- Ystradgynlais.

And the following Housing Market Areas as Low Viability Areas:

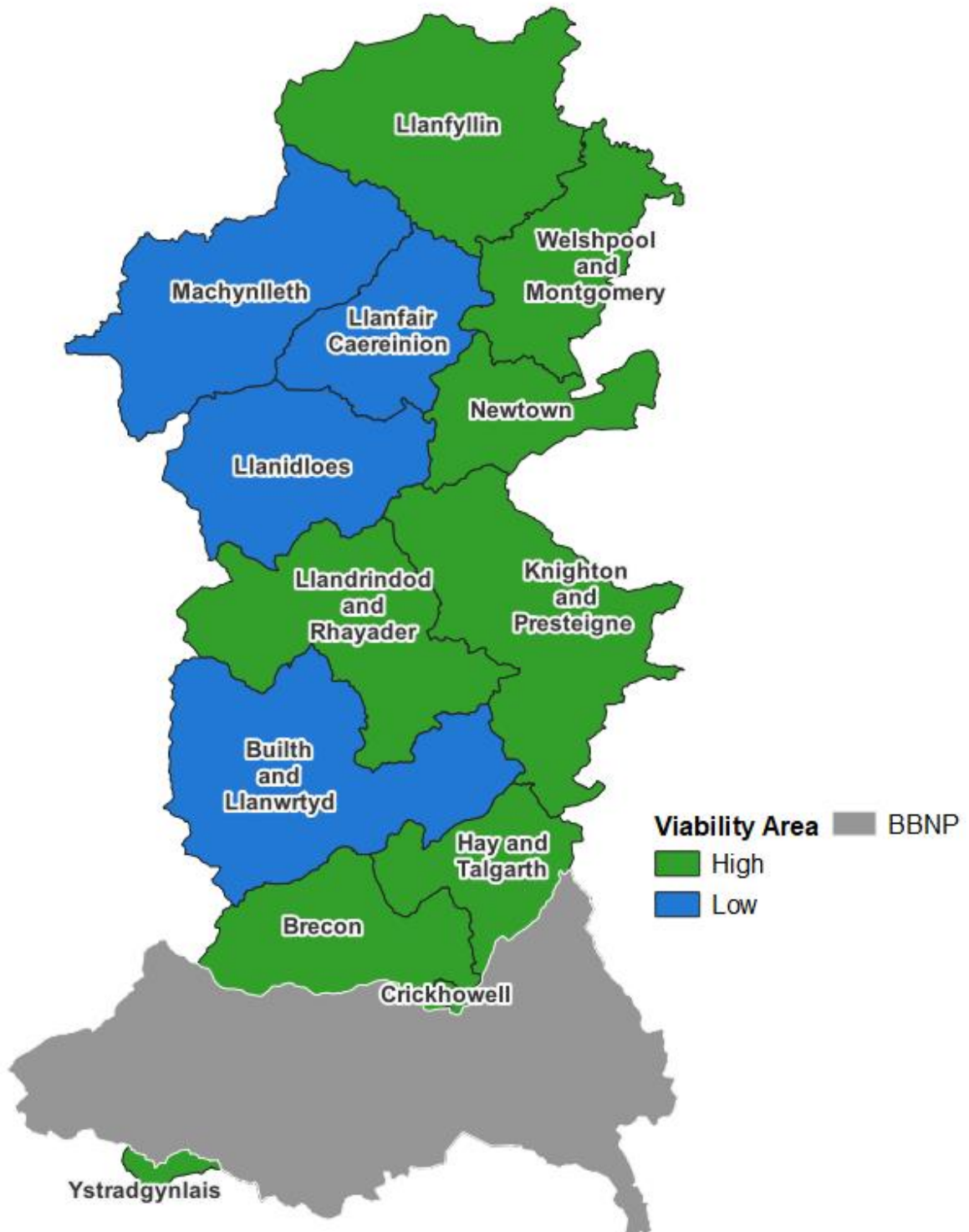
- Builth and Llanwrtyd
- Llanfair Caereinion
- Llanidloes
- Machynlleth.

3.45 The percentages of affordable housing contributions that can be expected from different sized residential sites are detailed in Table 5. These range from a 35% contribution on sites of over 100 dwellings in a High Viability Area, to a 0% contribution on all small sites of less than five dwellings. These are preliminary findings and are subject to change following further research and testing.

Table 5. Percentage of Affordable Housing Contributions that can be Expected from Different Sized Residential Sites

Size of Site	High Viability Area	Low Viability Area
Less than 5 dwellings	0%	0%
5-9 dwellings	25%	0%
10-19 dwellings	25%	15%
20-100 dwellings	20%	15%
Over 100 dwellings	35%	30%

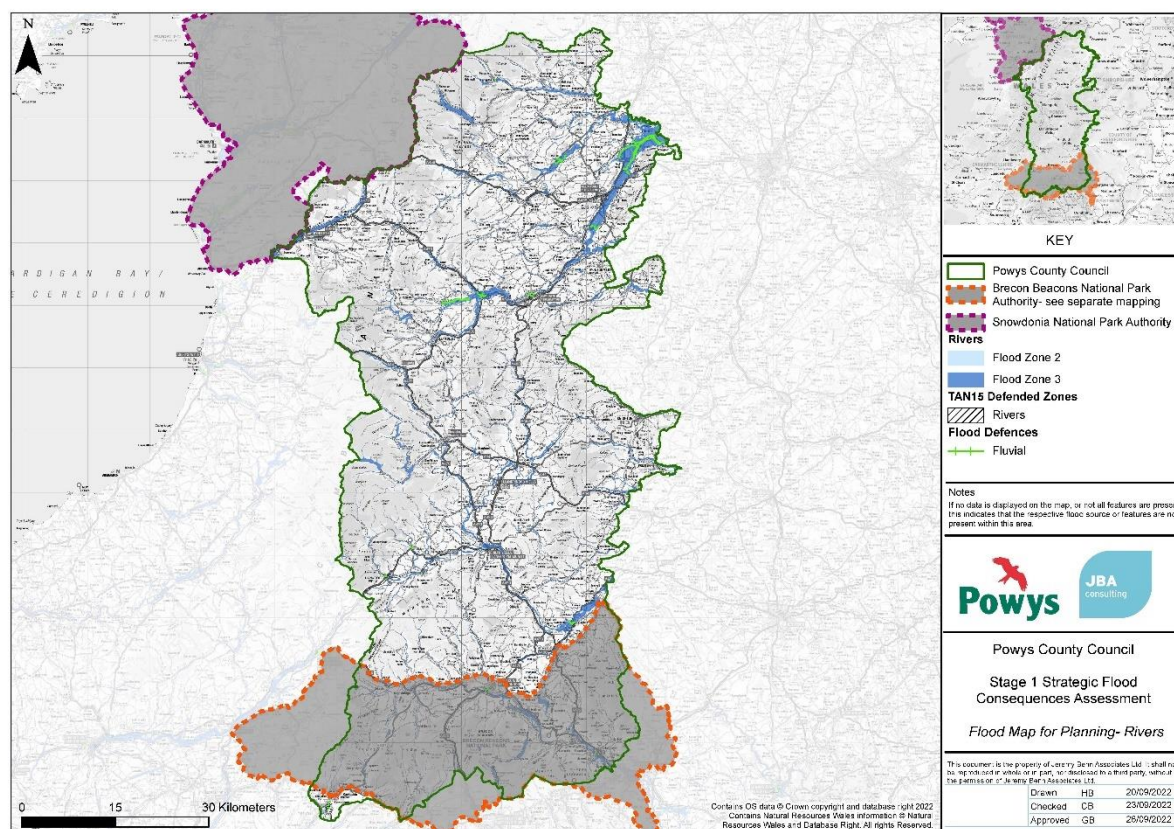
Figure 10. Map Showing which of the Housing Market Areas are High and Low Viability Areas.



Flood Risk

3.46 In accordance with Planning Policy Wales, LPAs should adopt a precautionary approach by directing development away from areas at risk of flooding from the sea or rivers. The Flood Map for Planning (FMfP) has been reproduced in the Strategic Flood Consequences Assessment (SFCA) prepared by JBA Consulting, as shown in Figure 11. This identifies that parts of the Powys LPA area are affected by river flooding, and this will have implications on the ability of certain areas to accommodate new development.

Figure 11. Flood Map for Planning – Rivers (from Mid Wales SFCA)



Source: Strategic Flood Consequences Assessment (SFCA) (2022)

3.47 Appendix C of the SFCA recognises that due to the nature of the topography in Powys, flood plains for the two largest rivers, the River Severn and River Wye, are wide and flat. This enables water to cover large areas, with areas furthest downstream located within FMfP Flood Zones 2 and 3.

3.48 The floodplain of the River Severn is noted to be the most extensive floodplain within Powys, with FMfP Flood Zones 2 and 3 forming areas within close proximity to the watercourse, and extending into areas such as Newtown, Welshpool, Llanidloes, Llandinam, Caersws and Abermule. The areas at highest fluvial flood risk are those locations in the north east of Powys, where multiple tributaries converge with the River Severn.

3.49 The River Wye is one of the River Severn's main tributaries and rises in Plynlimon in the Cambrian Mountains. The river principally flows alongside the A470 in a southerly direction, passing via settlements such as Rhayader, Newbridge on Wye, and Builth Wells. Fluvial flood risk in these reaches is fairly confined to the watercourse, with Flood Zones 2 and 3 present within close proximity to the river. Fluvial flood risk within the catchment is recognised as being particularly dominant between Glasbury and Hay on Wye.

3.50 The Plan area includes the following other Main Rivers:

- Bechan Brook
- Guilsfield Brook
- River Cain
- River Dovey
- River Honddu
- River Ithon
- River Irfon
- River Lugg
- River Tanat
- River Tawe
- River Teme
- River Vrynwy

3.51 FMfP Flood Zones 2 and 3 are present near these other Main Rivers, although their floodplains are fairly confined and remain within close proximity to the watercourse. They are considered therefore not to pose as great a risk to settlements as the Rivers Severn and Wye. However, the SFCA does state that where the River Banwy converges in the middle reach, near to Meifod, FMfP Flood Zones 2 and 3 are extensive and with high levels of fluvial flood risk.

3.52 There are flood defences found along the River Severn, River Vyrnwy, River Wye, and River Irfon that are maintained by NRW. As a result, some of these flood defences (with a standard protection of 1 in 100 years), enable parts of the fluvial flood plain to be categorised as Technical Advice Note (TAN) -15 Defended Zones. Therefore, some development maybe possible, subject to satisfying the requirements of the Justification Tests in Welsh Government's TAN 15 guidance.

3.53 The SFCA highlights that there are parts of the LPA area that are currently at high risk from flooding, with no significant protection from flood defences. Consequently, the Replacement LDP needs to direct development away from flood risk areas, particularly areas recorded as FMfP Zone 3. All development will need to comply with the latest TAN 15 advice.

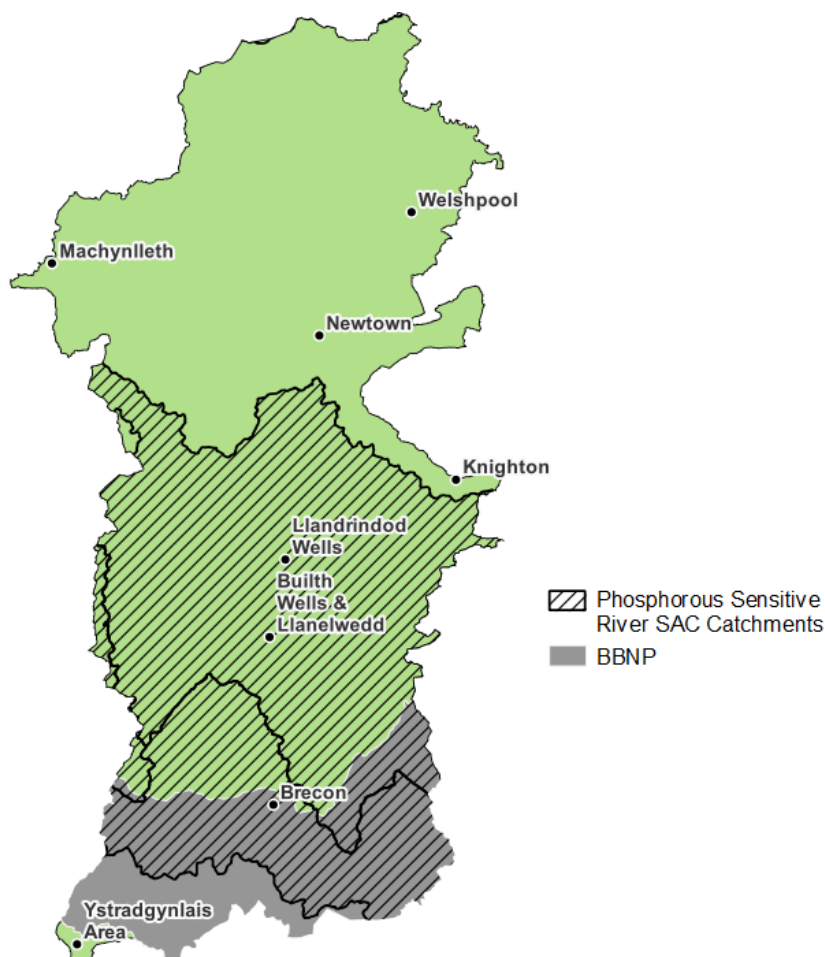
Phosphorus Sensitive River Special Area of Conservation (SAC) catchments

3.54 Figure 12 shows the areas where there are restrictions in place (2024) relating to the impacts of phosphorus on sensitive river SAC catchments in the Powys LPA area. NRW issued Interim Planning Advice in December 2020, which has been updated and kept under review, and requires new development within the affected SAC catchments to achieve nutrient / phosphate neutrality.

3.55 Within the Powys LPA area, the Tier 1 settlements within a phosphorus sensitive river SAC catchment are Llandrindod Wells and Builth Wells. These are both settlements that are subject to imminently planned improvements to their Waste Water Treatment Works (as part AMP7 2020-25) which will enable new development within these settlements to achieve phosphate neutrality. The Replacement LDP will only include site allocations where there is confidence that phosphate neutrality, in accordance with the latest NRW guidance, can be achieved within the Replacement LDP Plan period (2022-2037).

3.56 For more information on how the Replacement LDP is considering phosphorous sensitive SAC catchments please see the Phosphate Position Statement, published as part of the evidence for the Replacement LDP.

Figure 12. Phosphorous Sensitive River SAC Catchments in the Replacement LDP Area



Brownfield First and Best and Most Versatile Agricultural Land

3.57 National planning policy requires that LPAs in preparing LDPs, to consider allocating brownfield land (land that has previously been developed) over greenfield land. The Replacement LDP will seek to do this, however it needs to be established if there is enough viable and deliverable brownfield land to do so.

3.58 The call for Candidate Sites has shown that the vast majority of land that has been submitted is greenfield. Powys is a rural authority with limited opportunities for the redevelopment of brownfield land. Development boundaries will be drawn to encourage the development of brownfield sites in sustainable locations. Historically, when opportunities on brownfield land have become available these have more oftenly developed as windfall development. The benefit of brownfield sites coming forward as windfall development, rather than site allocations, being that the timing of the redevelopment can more readily coincide with the ceasing of the former use.

3.59 Whilst brownfield land will be sought for allocation where possible it needs to be acknowledged that some development of greenfield land will be required.

3.60 The location and quality of agricultural land is a further factor that will inform the spatial distribution of growth. Planning Policy Wales emphasises that the Best and Most Versatile (BMV) agricultural land, defined as Grades 1, 2 and 3a by the Agricultural Land Classification (ALC) system should be conserved, as it is a finite resource.

3.61 The spatial strategy will seek to reduce any loss of the highest quality (Grades 1, 2 and 3a) resource and locate development in areas of lower or no classification. Any areas which are proposed in higher grade land will need to meet the national policy requirements for the use of agricultural land; whereby it can only be developed if there is an overriding need for the development, and sites of previously developed land or land in lower agricultural grades are unavailable.

Welsh Language

3.62 Welsh Government aims to have a million Welsh speakers in Wales by 2050 – an increase of almost 80% on current levels. Future Wales requires Welsh language to be an embedded consideration in the spatial strategy of all development plans. Where Welsh is the everyday language of the community, development must be managed to ensure there are jobs and homes to enable the language to remain central to those communities identified.

3.63 Elsewhere development should be a positive force towards encouraging the creation of education and social infrastructure to enable the language to develop as a natural, thriving part of communities. Figure 13 identifies the Welsh language strongholds in the Replacement LDP area.

Figure 13. Welsh Language Strongholds in Powys LPA Area.



Location of Housing Land Supply

3.64 The available Housing Land Supply will form a substantial component of the housing provision in the Replacement LDP.

3.65 Included within the housing land supply are the large site (five dwellings or more) Housing Commitments. These sites will be shown on the inset maps in the Deposit Replacement LDP and will be an important delivery mechanism when it comes to addressing the needs identified in the LHMA.

3.66 The spatial options will need to take into consideration the location and tenure of the Housing Commitments and make sure that any shortfalls in the supply are addressed through site allocations and enabling policies.

3.67 However as documented in the Housing Land Supply background paper, it is not anticipated that every dwelling will result in completion during the Replacement LDP Plan period, and to account for this a non-delivery allowance has been applied when calculating the Housing Provision Figure. Table 6 shows the total number of dwelling commitments by Housing Market Area, and Table 7 the breakdown for affordable housing.

Table 6. Total Dwellings on Committed Housing Sites by Housing Market Area

Housing Market Area (excludes areas in BBNP)	Total Not Started 2024	Total Under Construction 2024	Completions 2022-2024	Total
Brecon	0	5	2	7
Builth and Llanwrtyd	148	48	18	214
Hay and Talgarth	52	30	36	118
Knighton and Presteigne	193	33	2	228
Llandrindod and Rhayader	69	189	0	258
Llanfair Caereinion	39	1	13	53
Llanfyllin	25	8	56	89
Llanidloes	188	16	49	253
Machynlleth	25	4	1	30
Newtown	105	106	91	302
Welshpool and Montgomery	405	121	110	636
Ystradgynlais	98	95	21	214
Total	1347	656	399	2402

Table 7. Total Affordable Dwellings on Committed Housing Sites by Housing Market Area

Housing Market Area (excludes areas in BBNP)	Total Not Started 2024	Total Under Construction 2024	Total Complete 2022 to 2024	Total
Brecon	0	3	0	3
Builth and Llanwrtyd	41	9	0	50
Hay and Talgarth	22	9	20	51
Knighton and Presteigne	55	9	1	65
Llandrindod and Rhayader	20	112	0	132
Llanfair Caereinion	8	0	12	20
Llanfyllin	7	2	20	29
Llanidloes	21	16	43	80
Machynlleth	16	1	0	17
Newtown	91	40	47	178
Welshpool and Montgomery	179	92	61	332
Ystradgynlais	0	14	0	14
Total	460	307	204	971

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

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

3.70 To determine the spatial location of future windfall developments that will contribute towards the housing provision of the Replacement LDP, past trends have been considered. Whilst an urban capacity study has not been undertaken, historic data demonstrates the opportunities for infill development, change of use / conversions and redevelopment within settlements that are available. The Adopted LDP included 58 settlements with development boundaries, these same settlements will form the Tier 1 to Tier 3 settlements in the

Replacement LDP. Outside of these settlements residential development is generally small scale to address specific needs or is permissible through national planning policy (e.g. barn conversions). It is not anticipated that there will be any substantial changes to this approach.

3.71 Table 8 shows the distribution of housing completions on windfall sites between 2011 and 2024, across the Housing Market Areas. This data is used together with the windfall allowance, calculated in the Housing Land Supply background paper, to project the distribution of housing completions on windfall sites across the Housing Market Areas over the remainder of the Replacement LDP plan period. Note any substantial policy changes will require these calculations to be revisited.

Table 8. Total Dwellings Projected to be Delivered on Windfall Sites by Housing Market Area between 2024 and 2037.

Housing Market Area (excludes areas in BBNP)	Windfall Completions* 2011-2024	% of Windfall Completions	Replacement LDP Windfall Allowance per year	Projected Windfall Completions (over remaining 13 years)**
Brecon	51	2.60%	3	38
Builth and Llanwrtyd	124	6.33%	7	92
Crickhowell	6	0.31%	<0	4
Hay and Talgarth	133	6.79%	8	99
Knighton and Presteigne	196	10.01%	12	146
Llandrindod and Rhayader	227	11.59%	14	169
Llanfair Caereinion	96	4.90%	6	71
Llanfyllin	149	7.61%	9	111
Llanidloes	143	7.30%	9	106
Machynlleth	90	4.60%	5	67
Newtown	286	14.61%	17	212
Welshpool and Montgomery	395	20.17%	24	293
Ystradgynlais	62	3.17%	4	46
Total	1958	100%	118	1454

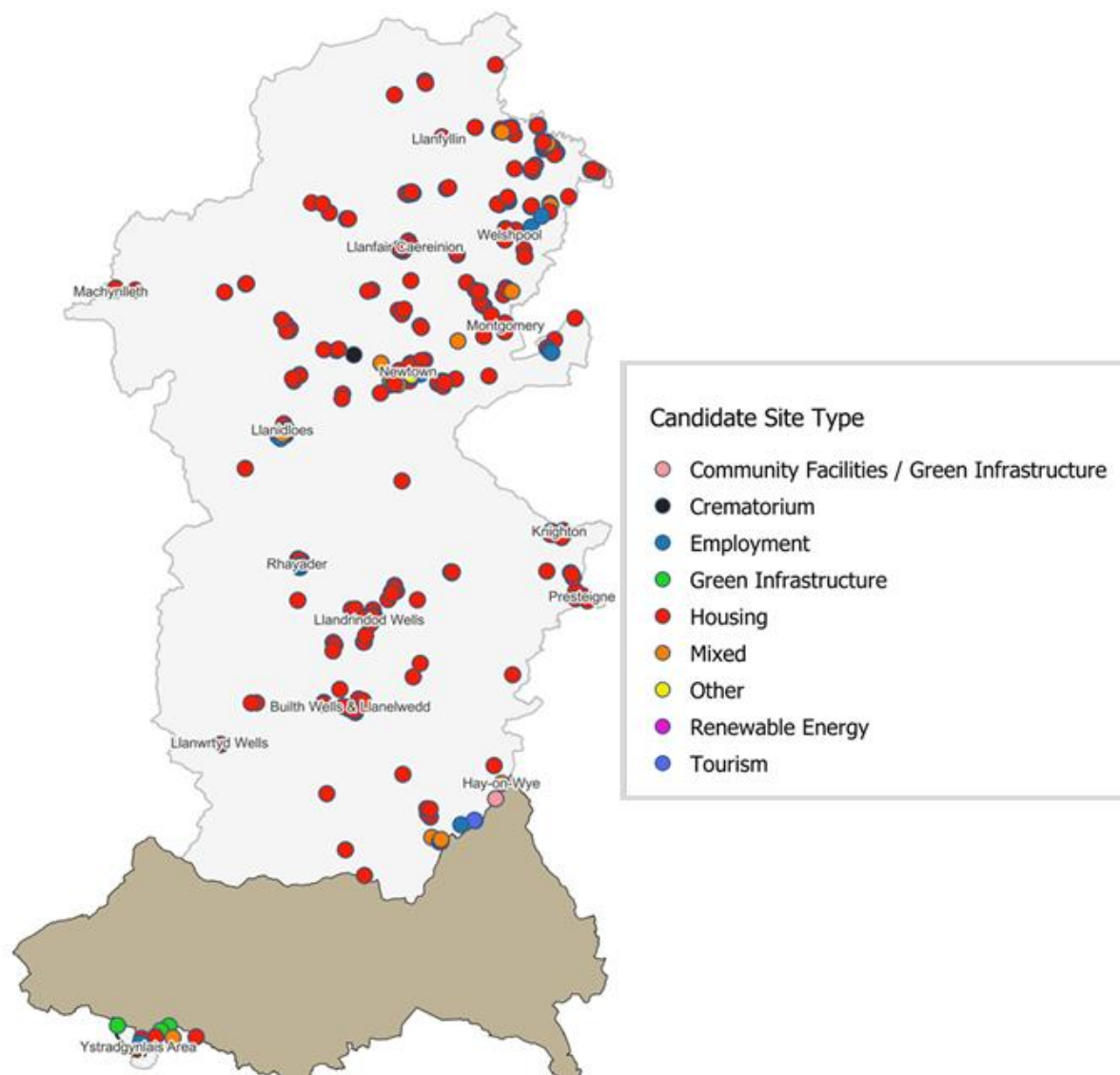
* Completion data for the 2014-2015 monitoring period has been excluded from the dataset and totals. This is due to issues with the way data was collated in that monitoring period, resulting in inconsistencies. ** Calculated as per methodology in Housing Land Supply paper.

Candidate Sites

3.72 A call for Candidate Sites was undertaken November / December 2022, this resulted in 300 submissions.

3.73 As can be seen in Figure 14, submissions were made across the plan area with concentrations in the Bro Hafren and Heart of Wales Regional Growth Area clusters. The majority of sites 258 (86%) were submitted for residential development, with 11 (4%) for employment uses and a further 23 (8%) for consideration for mixed use proposals.

Figure 14. Distribution of Candidate Sites Submitted for Consideration in the Replacement LDP (2022)



3.74 From the 300 candidate sites submitted, 212 have passed the initial site filter as detailed in the Candidate Site Assessment Methodology. The 212 sites will be assessed against the detailed site assessment criteria in the Candidate Site Assessment Methodology and against the Preferred Strategy. During the Preferred Strategy consultation there will be a further opportunity for Candidate Sites to be submitted.

Stakeholder Feedback at Engagement Events

3.75 Two in person workshops were held to discuss potential Spatial Options for The Replacement LDP. The first was in Llandrindod Wells on the 11th March 2024 and the second in Newtown on the 13th March 2024.

3.76 The Three Spatial Options presented for discussion were:

- **Affordable Housing Led** - Based on distributing growth solely to areas with affordable housing need as per the LHMA and from data collated on the number of people joining social housing waiting lists each year.
- **Population Apportionment Led** - The Population Apportionment Option distributes 'new provision' across the 13 Housing Market Areas based on the total percentage of the population in the Housing Market Areas.
- **Regional Growth Area Led** - The Regional Growth Area Led option focuses the majority of 'new provision' to the Regional Growth Areas, whilst still addressing housing need, identified in the LHMA.

3.77 Further information regarding the three options is included within Section 4.

Stakeholder Feedback for: Affordable Housing Led Strategic Option

Participants felt the benefits were:

- Guaranteed 100% affordable dwellings on new allocations.
- Possibility of allowing more younger people to remain in their communities, more so than the Regional Growth option.

Participants felt the disadvantages were:

- **Deliverability** – Dependent on method of delivery, participants expected that it would fall on the Local Housing Authority / Register Social Landlords to deliver, which would be a risk depending on the amount of grant funding to be made available by Welsh Government.
- **Location of sites** – that the location of need may not always be appropriate for the location of affordable dwellings, i.e. sites where car ownership is largely essential, as public transport cannot be relied upon, or simply isn't there at all.
- **Low need in some areas** - Even if affordable need is low in some areas according to LHMA, there may still be very low need for affordable or open market housing in these areas that would not be addressed.
- **LHMA dependent** - some areas of high need according to social housing waiting lists, will have no new allocated sites, as either the need is not recognised in the LHMA, or the Housing Land Supply shows that provision has already been met.
- **Viability** – Participants questioned how this strategy would work against viability evidence. For example, South West Powys has no requirement for affordable housing contributions in the Adopted LDP (2011-2026) due to lack of viability to develop sites in the area.

- **Social** – Participants were concerned that this approach may lead to unbalanced social structure / mix of housing tenures which might prove unhealthy, particularly on larger sites.
- **Less land available** - Participants were concerned that an affordable housing led strategy might lead to less land coming forward, with landowners withholding land that might achieve lower value than open market housing land.

Further comments from participants:

- In the defined Rural Areas or in areas where planning technical constraints exists e.g., Welshpool, it might be that a community led affordable housing solution on infill sites might be able to contribute to the supply of affordable housing.
- Reality is that there may be a need to allow a small percentage of market houses on exception sites to cross subsidise development to support growth.
- There is a need to demonstrate affordable housing allocations where they are needed BUT it will still be a necessity to accommodate local needs affordable housing to meet rural sustainability needs.
- Consideration needs to be given to up to date housing waiting lists not just the need identified in the LHMA.

Stakeholder Feedback for: Population Apportionment Led Strategic Option

Participants felt the benefits were:

- The option is reflective towards where people want to live.
- That this option would result in a more even spread of new homes being provided across more communities than the other two options.
- That this option has the potential to allow more younger people to remain in their communities, more so than the Regional Growth Area spatial option.

Participants felt the disadvantages were:

- That it was unlikely that there would be even growth across all areas.
- That the option may not necessarily take into account of where the housing demand will be. It was considered that there are Housing Market Areas with a higher or lower than average percentage of the population in housing need.

Further comments from participants:

- The Population Apportionment Led spatial option should take differences in population and household composition into account. A population with more younger people is likely to need more homes than an older population. Questioned whether it takes into consideration migration from bordering counties.

Stakeholder Feedback for: Regional Growth Area Led Strategic Option

Participants felt the benefits were:

- More likely to be a higher housing demand in the Regional Growth Areas than in other areas across the County.
- Housing Growth would be more aligned to employment growth in the Regional Growth Areas.

Participants felt the disadvantages were:

- Some areas of Powys not in growth areas may have housing need, but that need might not be fully accommodated within this growth led option.

Further comments from participants:

- Regional Growth Area Led spatial option is a policy choice. It seems logical for distribution of growth to match the policy.

Stakeholder Feedback: Preference

3.78 Participants were asked to detail their preferred spatial option. The following comments were received:

Comment: “Probably needs to be a happy medium between the Population Apportionment and Regional Growth Area options. For housing and employment, the growth option can work for the Newtown / Welshpool area. Newtown has a younger population, there are diverse employment opportunities and there are transport links with North Wales / West Midlands / Northwest England. Where would the growth in Llanidloes / Rhayader / Llandrindod Wells / Builth Wells come from?”

Comment: “Preference for Regional Growth Area option. Maximise or concentrate development opportunities to provide synergy of infrastructure provision and public service provision to produce an economically sustainable core of population in an area. Basically, provision of connectivity and services will be more economically and environmentally sustainable if considered as a prior provision”.

Comment: “I am content about focusing / concentrating growth in identified Regional Growth Areas, but this must be overlaid with strong and coherent proposals for lower tier settlements to allow for modest organic growth of a mix of open market and affordable exception sites”.

Comment: “I favour the affordable housing led option but may not fully appreciate what constraints there are”.

Replacement LDP Growth Options

3.79 In determining the Spatial Options, consideration needs to be given to how much growth the Replacement LDP is seeking to deliver. The Growth Options background paper concludes with a recommendation that the Replacement LDP has a Dwelling Requirement Figure of 3,975 dwellings, to be delivered over the Replacement LDP plan period. To deliver the 3,975 new dwellings, a 21% flexibility allowance has been applied to give the Replacement LDP a Housing Provision Figure of 4,810 dwellings. The components making up the housing provision are detailed in Table 9 and it is worth noting that new allocated sites make up 28% of the provision.

Table 9. Components of Housing Supply in Replacement LDP

	Small Sites	Large Sites*	Total
Completions (1st April 2022 – 31st March 2024)	195	408	603
Potential Housing Commitments (large sites) under construction	N/A	656	656
Potential Housing Commitments (large sites) Not Started minus non-delivery allowance (44%)	N/A	754	754
New Housing Allocations	N/A	1,343	1,343
Projected Units on Windfall Sites (13 years remaining)	1,014	440	1,454
Total Housing Provision	1,209	3,601	4,810

* Large sites are sites with five dwellings or more.

3.80 With regards to employment land, the Growth Options background paper recommends provision is made for 40 hectares of Class B employment land. The 40 hectares provision consists of 8.16 hectares in the committed supply and a further 31.84 hectares on new employment allocations.

4. Consideration of Spatial Options

4.1 All of the spatial options being considered as the Preferred Strategy for the Replacement LDP must be realistic according to the Development Plans Manual (Edition 3). The manual requires spatial options to be 'genuine, reasonable, reflect the evidence and the plan's issues/objectives, meet the evidenced needs of the area, be deliverable within the plan period, conform to national policy, complement regional or local initiatives and to be flexible and sustainable.' LPAs are required to consider the appropriateness of options previously considered, including new alternatives.

4.2 All of the evidence discussed in previous sections of this paper need to be taken into consideration in the drafting of the spatial options. However, there are four elements of particular importance when it comes to considering which options are realistic, these are:

- **Housing Need** - for both Affordable and General Market Homes as evidenced in the Local Housing Market Assessment (LHMA).
- **The Housing Land Supply** – completions and large site Housing Commitments form 42% of the housing provision, with 30% being provided through projected windfalls.
- **National Planning Policy** - Regional Growth Areas, Clusters, Rural Areas and the Sustainable Settlement Hierarchy.
- **Location of Employment Need** – as evidenced in the Employment Needs Assessment

4.3 Understanding the spatial context of these four elements and how they interact with each other is crucial when determining whether a spatial option is able to deliver on the Replacement LDP's objectives, meet the evidenced needs of the area, be deliverable within the plan period, conform to national policy, as well as being able to complement regional / local initiatives and able to be flexible and sustainable.

4.4 In addition to the four elements, all evidence detailed in Section 3, together with the regional context, stakeholder input and local aspirations have also been given detailed consideration when determining the spatial options.

4.5 There are other key planning policy issues that must be incorporated into whatever strategy option is chosen. These have not been referred to in the spatial options analysis but will be an integral part of any strategy. These include:

- Utilise previously developed land before greenfield sites in the first instance.
- Address climate change through mitigation and adaptation.
- Promote placemaking principles.
- Promote sustainable transport and modal shift.
- Maximise opportunities for green infrastructure enhancement.
- Respond to the nature emergency through biodiversity net benefit.

4.6 The four spatial options being considered are:

- Continuation of The Adopted LDP (2011-2026) Spatial Strategy
- Affordable Housing Led
- Population Apportionment Led (dispersed growth)
- Regional Growth Area Led (focussed growth)

Continuation of The Adopted LDP (2011-2026) Spatial Strategy

4.7 The Spatial Strategy of the Adopted Powys LDP (2011-2026) aimed to promote proportionate growth to reinforce the network of market towns and villages within Powys. The strategy sought to distribute growth pro-rata according to a settlement's existing population/size and the services/facilities available. This approach enabled the highest proportion of growth to be distributed to what was considered by the Adopted LDP to be the most sustainable locations, the Towns and Large Villages, whilst protecting important strategic resources and assets. A key element of the Adopted LDP's Spatial Strategy was the settlement hierarchy which consisted of:

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

4.8 Figure 15 details the key diagram for the Adopted LDP and shows the distribution of the Towns, Large Villages and Small Villages across the plan area.

4.9 The level of housing growth apportioned to each Town and Large Village took into consideration the presence of Housing Commitments, with the remaining provision being met through housing land allocations. Deviations from the baseline pro-rata housing growth figure took place where the Towns or Large Villages were constrained, had limited land available or had seen significant historical development. In a similar way to housing growth, the Adopted LDP distributed employment growth in accordance with the settlement hierarchy to ensure that Towns and Large Villages were to be the focus for such development.

4.10 Each Town and Large Village had a development boundary, with new housing growth in Small Villages being controlled by a policy approach (instead of a development boundary) restricting new housing development to small infill sites only.

4.11 The Review Report and ongoing Annual Monitoring Reports have highlighted that housing development permitted, since the adoption of the LDP, has generally been in accordance with the spatial strategy when looking at cumulative targets. However, with regards to employment land the Annual Monitoring Framework sets out, in monitoring indicator AMR19, a target of:

“Percentage of net employment land permitted by tier of hierarchy per annum to accord with the following distribution:

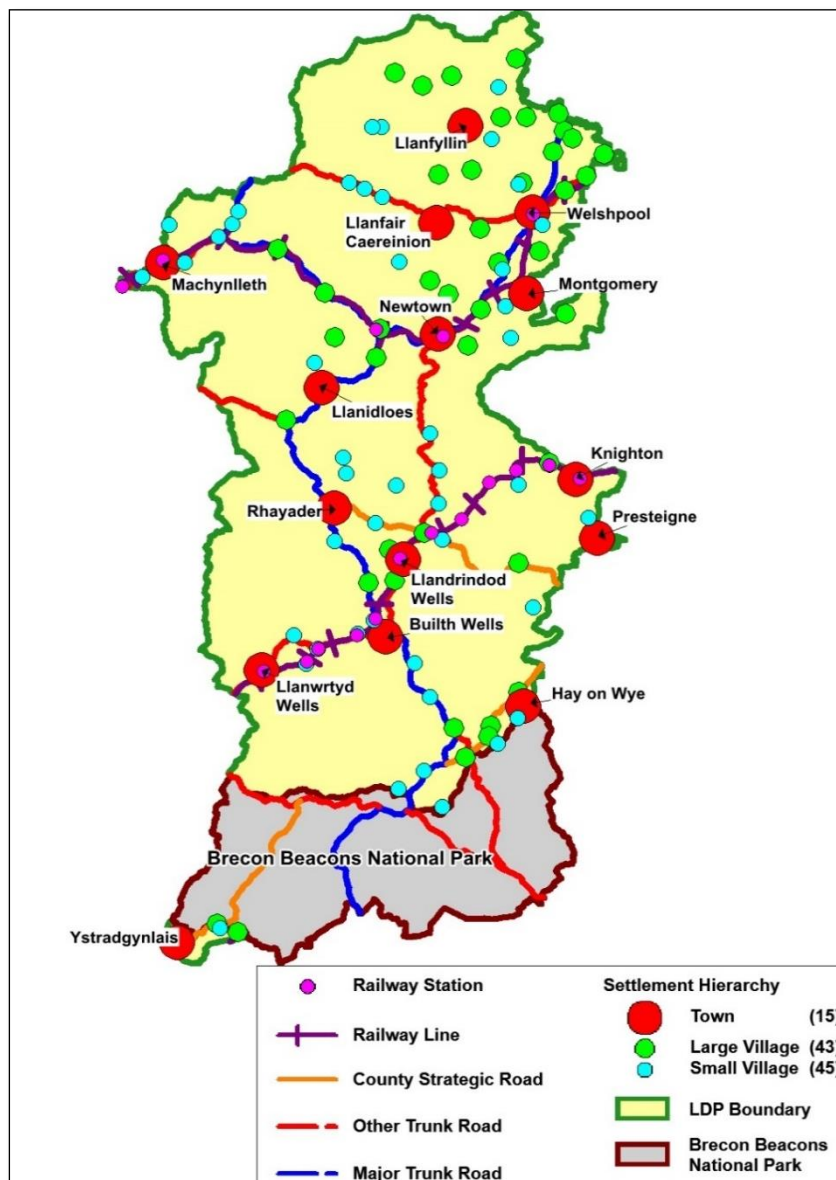
- **Towns – at least 50% of total employment growth permitted.**
- **Large Villages – no more than 20% of total employment growth permitted.**
- **Sites located outside the settlement hierarchy – no more than 30% of total employment growth.”**

4.12 The 2023 Annual Monitoring Report noted that with regards to the distribution of employment growth across the settlement hierarchy the trigger point for the monitoring indicator (AMR19) had been reached. This meant that the proportion of employment land permitted in the lower tiers of the settlement hierarchy exceeded the target for more than two consecutive years. The monitoring report recommended that the Replacement LDP, should reconsider the targets and the spatial strategy with regards to employment growth.

4.13 Part of the reason for the targets set out in monitoring indicator AMR19, being exceeded are down to the Adopted LDP strategy not recognising the functional relationships between settlements. Due to limited capacity within the towns, employment allocations were

made in neighbouring lower tier settlements that had a functional relationship (including sustainable transport opportunities) with the Towns themselves. These allocations have subsequently received planning permission and been developed, contributing towards the reasons why the trigger point for monitoring indicator AMR19 has been reached.

Figure 15. Adopted LDP Key Diagram



Source: Adopted Powys LDP (2011-2026)

4.14 The evidence supporting the settlement hierarchy has been reviewed within the Settlement and Small Settlement Assessment background papers that support the Replacement LDP. The revised settlement assessment is based on there being a greater emphasis placed on reducing the need to travel and for there to be access to sustainable transport opportunities. This is further evidenced in the Integrated Planning and Transport Strategy background paper. The functional relationship between settlements has also been reconsidered; recognising the role that clusters can have in the distribution of growth and the application of placemaking principles, whilst reflecting the diversity of the LDP area, meeting the needs of local communities and utilising the concept of living locally in a rural authority.

4.15 Continuation of the Adopted LDP strategy would not be compatible with Future Wales policies, would not enable growth to be focused in to the Regional Growth Areas and could restrict the needs identified in the LHMA and the Employment Needs Assessment from being met. Reviewing the strategy and the settlement hierarchy, will enable the Replacement LDP to be more aligned to updated Welsh Government and Future Wales requirements and allows for the needs of residents, businesses and communities to be met.

4.16 However, it is worthwhile to establish what elements of the Adopted LDP spatial strategy have worked and should be included within the Replacement LDP and what has not worked and needs to be changed.

Analysis

4.17 To assess the Adopted LDP strategy some of the key elements are analysed below. However, it should be remembered that the overall strategy is much wider than simply the spatial element and therefore the performance of the strategy should be looked at as a whole which can be viewed in the Annual Monitoring Reports and the Review Report.

Pro-Rata Apportionment

4.18 The pro-rata apportionment element to the distribution of growth is considered to have worked well in that it meant every Town and Large Village was entitled to a share of the growth, enabling communities to meet local housing needs. However, it does not take into consideration the fact that some communities may have greater housing needs than others, or the fact that some areas of Powys have a greater proportion of settlements than others. Continuation of this element of the strategy as it is, would not enable the needs of Housing Market Areas identified in the LHMA to be met.

4.19 With regards to alignment with Future Wales, continuation of the Pro-Rata Apportionment approach would need further investigation to determine to what extent growth would be focused into Regional Growth Areas.

Settlement Hierarchy

4.20 It is considered that the use of a settlement hierarchy has worked well with regards to directing development to sustainable locations. However, the position of settlements within the hierarchy needs to be reviewed to give greater weight to settlements that can facilitate a reduction in the need to travel and which provide access to sustainable transport opportunities. Furthermore, the relationship between settlements needs to be given consideration to reflect the role and function of groups of settlements that cluster together to collectively meet the needs of residents with regards to housing, employment opportunities and service provision.

Development Boundaries

4.21 The use of development boundaries for the Towns and Large Villages has worked well, encouraging the redevelopment of previously developed land within settlements and protecting the wider landscape and open countryside.

Policy Approach

4.22 The Adopted LDP included a policy approach, instead of the use of development boundaries, for the permitting of development in the lower tiers of the settlement hierarchy. With regards to Small Villages, the Adopted LDP policy enabled small scale infill sites for open market housing and affordable homes through exception site policies, subject to

environmental and infrastructure capacity constraints. This approach is considered to have worked well.

4.23 Rural Settlements are not named within the Adopted LDP but defined by a set of characteristics. Within these settlements limited development for single affordable dwellings is permissible where well integrated into the settlement and acceptable in terms of any environmental and infrastructure capacity constraints. Whilst the principle of this policy has worked well and has enabled the needs of rural communities to be addressed, the use of a set of characteristics to define settlements has proven to be more problematic. Therefore, continuation of this element of the strategy would need to be amended to make sure that settlements are named and are identified on the proposal maps.

Allocations

4.24 The Adopted LDP included a Dwelling Requirement Figure of 4,500 dwellings. According to the latest Annual Monitoring Report (2024) a total of 3,073 of the 4,500 dwellings have been delivered, representing 68% of the target. With two years of the plan period remaining, it is unlikely that the Dwelling Requirement Figure will be met.

4.25 The components of the Housing Provision Figure of 5,588 in the Adopted LDP are:

- Completions plus Housing Commitments = 1,394 (25%)
- Allocated Sites = 2,984 (53%)
- Development on Windfall Sites = 1,210 (22%)

4.26 The success of growth strategy in the Adopted LDP was therefore heavily dependent on the delivery of the allocated sites. However, the Annual Monitoring Reports have consistently reported the lack of delivery on the allocated housing sites. At the 1st April 2024, only 184 dwellings had been completed on the allocated sites out of the 2,984 dwellings provided for, meaning only 6% of what was anticipated had been delivered.

4.27 The actual components of the completions that delivered the 3,073 dwellings (2011-2024) are:

- Completions (up to 2015) and Housing Commitments = 1,161 (38%)
- Allocated Sites = 184 (6%)
- Development on Windfall Sites = 1,728 (56%)

4.28 It is recognised that the limitations to development in the phosphorous sensitive River SAC catchments may have prevented some of the allocated sites from progressing, along with the introduction of the Flood Map for Planning. It will be imperative to the success of the Replacement LDP strategy that such constraints are fully recognised and factored into decisions regarding the location and phasing of allocations.

4.29 Allocated sites that have not received planning permission will not be included in the Replacement LDP, unless they have been submitted as a candidate site and scored appropriately in the Candidate Site Assessment Methodology. Sites will need to accord with the Preferred Strategy and comprehensively demonstrate that any barriers to deliverability have been overcome.

Summary

4.30 In summary it is recognised that for the Replacement LDP to align with Future Wales and National planning policy and to address the needs identified in the LHMA, continuation

of the spatial strategy in the Adopted LDP is not considered a preferable option. However, there are some elements of the Adopted LDP Spatial Strategy such as the use of development boundaries and the use of policies for lower tier settlements, that are working well and should be continued.

Affordable Housing Led Spatial Option

4.31 The Affordable Housing Led spatial option concentrates on addressing the need for affordable dwellings across the Housing Market Areas identified in the LHMA (2022-2037). However, concerns have been raised by Powys County Council Housing Officers, that the results coming from the 'Higher Variant' household projection scenario in the LHMA, are not reflective of the true need for affordable housing in Powys. This is based on the number of people annually joining housing waiting lists for social housing. To address this, further calculations have been made based on the number of people joining social housing waiting lists over the past few years and projecting these numbers forward. This spatial option considers both data sources.

The Key Elements of this Strategy are:

- Development located primarily to address affordable housing needs across the plan area and at the local Housing Market Area level.
- Lower levels of overall growth.
- Dispersed growth across the Replacement LDP area to communities in most need of affordable housing.
- Growth distributed across each Housing Market Area in accordance with the Settlement Hierarchy directing development towards the higher tier settlements whilst taking into consideration social housing waiting lists at the settlement level.

Details:

4.32 This spatial option would prioritise the delivery of affordable housing in areas of recognised need, across the Replacement LDP plan area. The strategy would support the aims of Future Wales and accord with Policy 7 – Delivering Affordable Homes, where in response to local and regional needs, LPAs should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.

4.33 Table 10 compares the total affordable housing need from the LHMA for each Housing Market Area, with the number of affordable dwellings in the housing land supply. The housing land supply includes affordable housing completions since the start of the Plan period (2022) and the number of affordable dwellings under construction, or not started on the Replacement LDP Committed Housing sites. Comparison between the affordable housing need for each Housing Market Area and the housing land supply enables the shortfall that would need to be addressed through the Replacement LDP to be calculated. It is anticipated that the shortfall would be addressed through both site-specific allocations and a policy approach.

4.34 Table 11 is similar but the affordable housing need is a total of the need identified in the LHMA with a further calculation based on the past number of people joining social housing waiting lists and projecting these numbers forward for each Housing Market Area.

Table 10. Total Affordable Housing Need Identified in the LHMA (2022-2027) Compared to Housing Land Supply to Identify the Shortfall to be Addressed.

Housing Market Area (excludes areas in BBNP)	Total Affordable Housing Need - LHMA	Affordable Housing Completions (2022-2024)	Housing Commitments – Affordable Dwellings (Not Started / Under Construction)	Shortfall between Affordable Housing Need and Supply (Completions plus Housing Commitments)
Brecon	33	3	3	27
Builth and Llanwrtyd	71	0	50	21
Crickhowell	3	0	0	3
Hay and Talgarth	45	21	31	0
Knighton and Presteigne	98	1	64	33
Llandrindod and Rhayader	74	2	132	0
Llanfair Caereinion	67	13	8	46
Llanfyllin	87	21	9	57
Llanidloes	48	47	37	0
Machynlleth	62	0	17	45
Newtown	121	48	131	0
Welshpool and Montgomery	214	65	271	0
Ystradgynlais	110	0	14	96
Powys LPA Area	1036	221	767	328

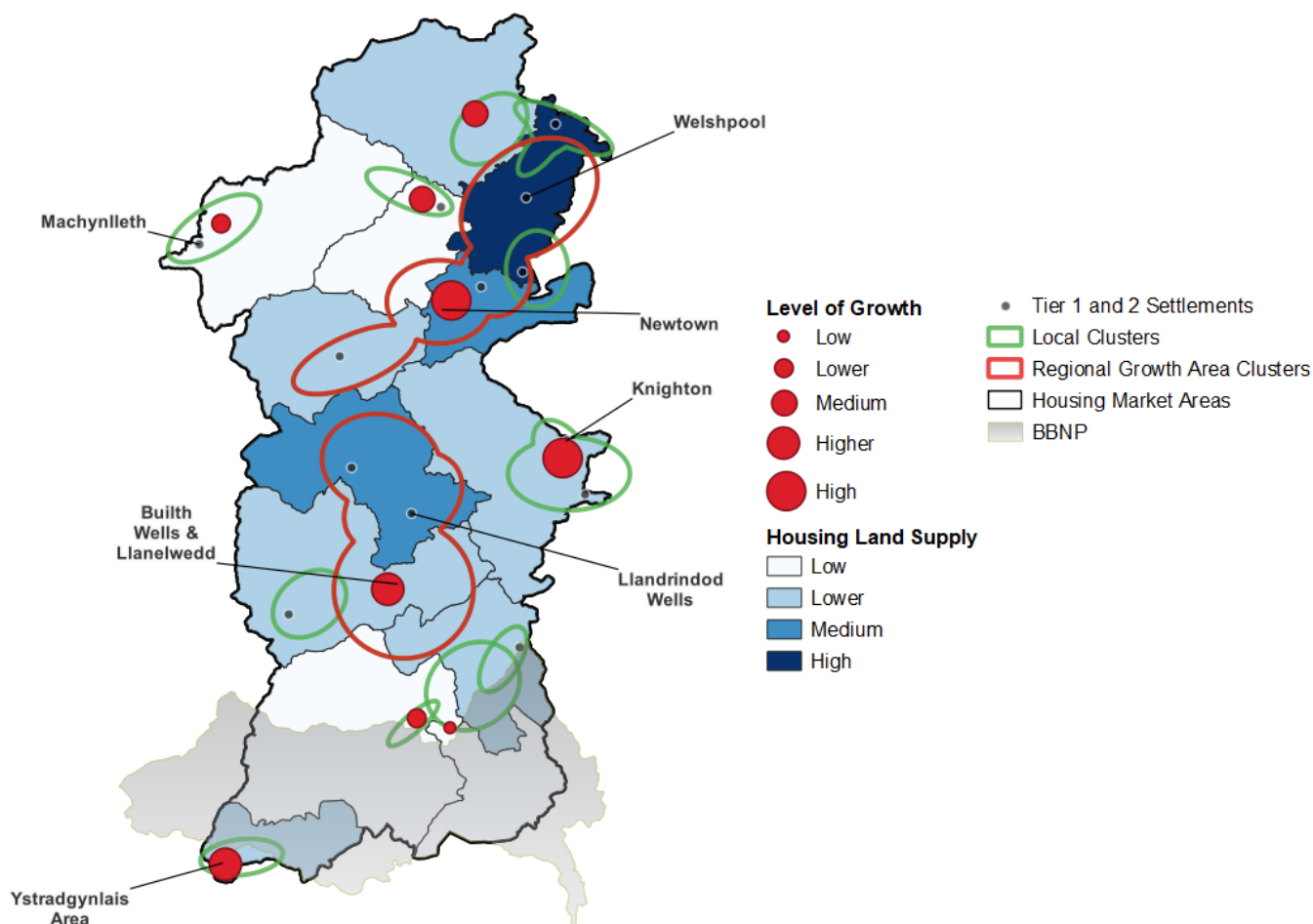
Table 11. Total Affordable Housing Need Identified in the LHMA (2022-2027) and from Further Calculations of Numbers Joining Social Housing Waiting Lists, Compared to Housing Land Supply to Identify the Shortfall to be Addressed.

Housing Market Area (excludes areas in BBNP)	Total Affordable Housing Need - LHMA	Affordable Housing Completions (2022-2024)	Housing Commitments – Affordable Dwellings (Not Started / Under Construction)	Shortfall between Affordable Housing Need and Supply (Completions plus Housing Commitments)
Brecon	59	3	3	53
Builth and Llanwrtyd	154	0	50	104
Crickhowell	4	0	0	4
Hay and Talgarth	48	21	31	0
Knighton and Presteigne	191	1	64	126
Llandrindod and Rhayader	94	2	132	0
Llanfair Caereinion	89	13	8	68
Llanfyllin	113	21	9	83
Llanidloes	63	47	37	0
Machynlleth	62	0	17	45
Newtown	615	48	131	436
Welshpool and Montgomery	280	65	271	0
Ystradgynlais	119	0	14	105
Powys LPA Area	1,894	221	767	1024

Source: Annexe C Table 3 LHMA - Estimated net change of common housing register, taking into account additional new need calculated by the LHMA Tool for the 2018-based household projection higher variant, 2022-2027, by housing market area, Powys Planning Authority area.

4.35 Figure 16 shows how growth would be distributed across the Replacement LDP area for the Affordable Housing Led spatial option. As with all of the spatial options, consideration needs to be given to the distribution of the housing land supply which will make up a significant component of the housing provision in the Replacement LDP, and this is represented by the blue shading for each Housing Market Area. The size of the red circles is indicative of the level of growth for each Housing Market Area, with growth being distributed through the Settlement Hierarchy and Clusters as appropriate.

Figure 16. Affordable Housing Led Spatial Option



4.36 The key advantages and disadvantages of this strategic option are as follows:

Advantages:

- Addresses affordable housing need.
- Contributes towards national and local priorities for sustainable rural communities, addressing rural depopulation and demographic challenges.
- Low growth option so any potential adverse impacts of development would be reduced.
- Contributes towards the aims of Future Wales with regards to the provision of Affordable Housing.

Disadvantages:

- Limited flexibility to respond to changing needs across the Plan area.
- Issues with viability and delivery, three out of the four Housing Market Areas with the most need (taking into consideration housing land supply) are in Low Viability Areas.
- Delivery is heavily reliant on the Local Housing Authority and Registered Social Landlords who have limited funding and different priorities.
- Lack of land and higher tiered settlements in some Housing Market Areas in proportion to the level of growth that would be required.
- Some Housing Market Areas, Tier 1 and 2 Settlements and parts of Regional Growth Areas would receive no growth (contrary to Future Wales).
- Most stakeholders raised concerns over this approach.
- Growth does not align with the Commercial Market Areas and where the need is for new employment sites.
- Does not address the need for open market housing, meaning the Replacement LDP would be reliant on what is in the housing land supply to meet this need.
- Some Housing Market Areas would receive a disproportionate amount of growth compared to their population and number of settlements.
- Higher levels of growth would go to the Welsh Language Strongholds compared to elsewhere.
- Level of growth is not planned in a way which would promote the Welsh Language at the community level in the Welsh Language Strongholds.
- Will not enable the Replacement LDP to address demographic challenges including the facilitation of inward migration.

The Population Apportionment Led (Dispersed Growth) Spatial Option

4.37 The Population Apportionment spatial option is a dispersed spatial option, that distributes growth across the 13 Housing Market Areas based on the total percentage of the population within each Housing Market Area.

The Key Elements of this Strategy are:

- Development is dispersed across the Replacement LDP area using Housing Market Areas, in a way that reflects the density and distribution of the population.
- For each Housing Market Area, the level of overall provision (housing land supply plus growth) is greater than the total housing need (both Open Market and Affordable dwellings) identified for the plan period in the LHMA - addressing identified needs.
- Employment growth will be distributed to Commercial Market Areas, using the same proportions as the housing growth, to enable a balance between new jobs and homes.
- Growth is distributed across each Housing Market Area in accordance with the Settlement Hierarchy focusing development to higher tier settlements and clusters where possible.

Details:

4.38 Table 12 shows the total and percentage of the population located within each of the Housing Market Areas. Feedback from the stakeholder engagement events suggested the percentage households per Housing Market Area should also be considered, therefore these have also been included in Table 12.

4.39 To determine the level of growth to be distributed across the Housing Market Areas, the 1,343 dwellings to be provided for (Section 3) on new allocated sites is apportioned using the percentages calculated in Table 12. The results determine the number of dwellings to be provided for on allocated sites for each Housing Market Area. Checks have been made to make sure that the total provision figure (housing land supply plus growth) for each Housing Market Area is equal to, or more than, the total housing need figure identified in the LHMA.

4.40 In general, this approach concentrates the highest levels of growth to those Housing Market Areas with the greatest population density. Areas of higher population density are typically able to support a greater range of services, meeting the needs of residents and reducing the need to travel. However, this strategic option also recognises that some growth is needed within less populated areas / more rural communities, to address local needs and to support the rural economy.

4.41 Employment growth is spatially aligned to the levels of housing growth, using the Commercial Market Areas, which overlap the higher population density areas of the Housing Market Areas.

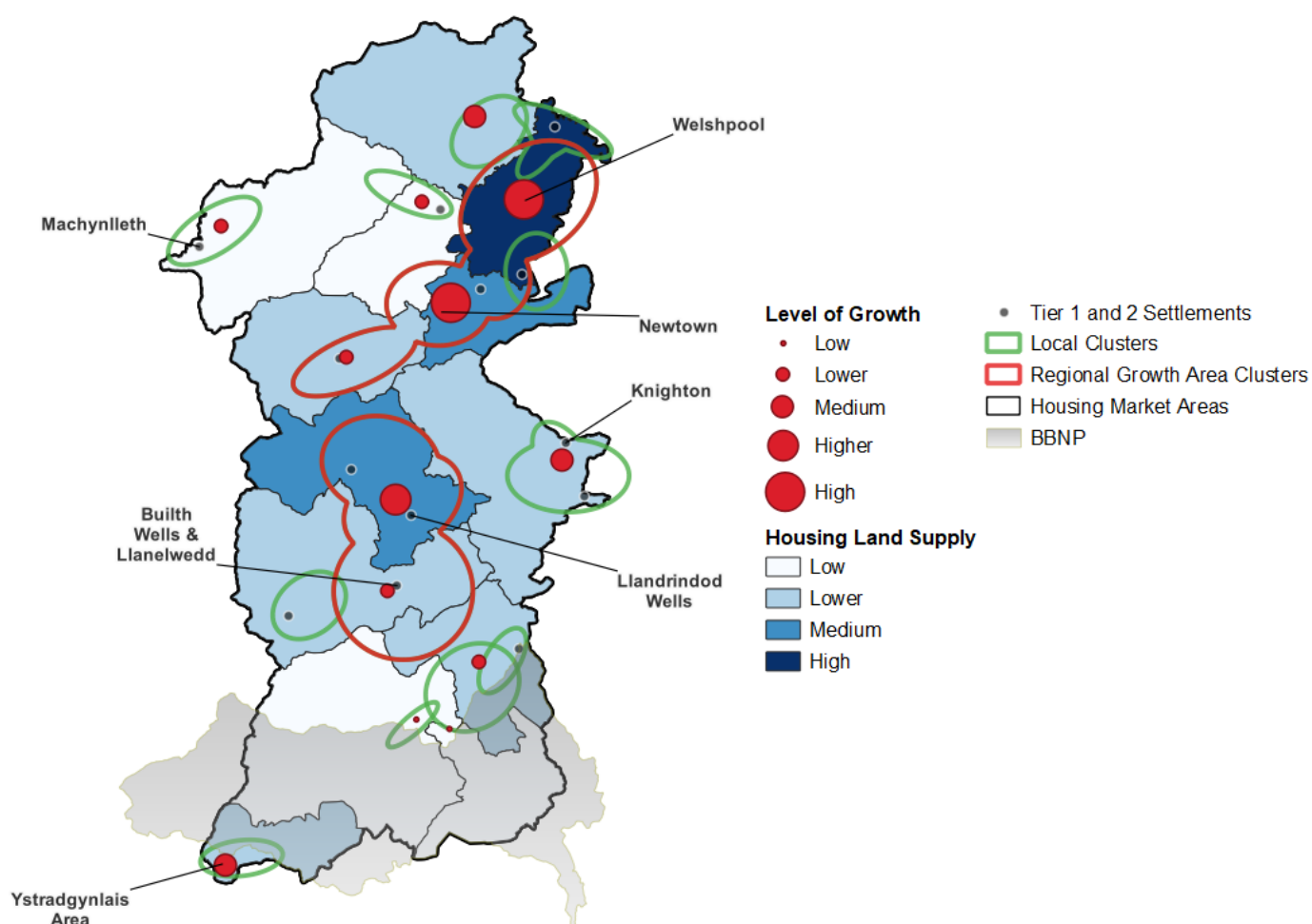
Table 12. Percentage of population and Households in each Housing Market Area (excluding areas within the BBNP)

Housing Market Area (excludes areas in BBNP)	Population in Powys LPA (2020 midyear estimates)	% of Total Population	Households in Powys LPA (Census 2021)	% of Total Households
Brecon	2,312	2%	1,012	2%
Builth Wells and Llanwrtyd Wells	6,697	6%	3,143	6%
Crickhowell	348	<1%	154	<1%
Hay on Wye and Talgarth	4,044	4%	1,860	4%
Knighton and Presteigne	9,636	9%	4,512	9%
Llandrindod Wells and Rhayader	12,767	12%	6,106	12%
Llanfair Caereinion	6,216	6%	2,684	5%
Llanfyllin	9,187	8%	4,056	8%
Llanidloes	6,573	6%	3,005	6%

Housing Market Area (excludes areas in BBNP)	Population in Powys LPA (2020 midyear estimates)	% of Total Population	Households in Powys LPA (Census 2021)	% of Total Households
Machynlleth	6,315	6%	2,806	6%
Newtown	16,967	16%	7,623	15%
Welshpool and Montgomery	18,438	17%	8,251	17%
Ystradgynlais	8,986	8%	4,631	8%

4.42 Figure 17 details the Population Apportionment Led spatial option. As with the affordable housing led spatial option, the size of the red circles is indicative of the levels of growth specific to each Housing Market Area, with growth being addressed through the Settlement Hierarchy and Clusters as appropriate.

Figure 17. Population Apportionment Led Spatial Option



4.43 The key advantages and disadvantages of Population Apportionment Led (dispersed growth) spatial option are as follows:

Advantages:

- Addresses overall housing need from LHMA.
- Contributes towards national and local priorities for sustainable rural communities, addressing rural depopulation and demographic challenges.
- Concentrates the higher levels of growth to higher population density Housing Market Areas, sustaining services and infrastructure improvements.
- Alignment between employment and housing.
- Some of the higher growth Housing Market Areas coincide with the Regional Growth Areas.

Disadvantages:

- Some Housing Market Areas (e.g. Llanfyllin) due to their extensive nature have a higher population, than smaller Housing Market Areas with a greater population density (e.g. Ystradgynlais). As a result, unsustainable level of development could be targeted to areas with limited services and facilities, whilst more sustainable locations with adequate services and facilities lose out.
- The ability to deliver infrastructure improvements may be more difficult than in a more focussed growth scenario.
- Not all settlements within the Regional Growth Areas would receive growth reflective of the settlement's role in the Mid Wales Region.
- Some Housing Market Areas are more constrained than others (e.g. Phosphorus sensitive River SAC catchments and flooding) and may not be able to facilitate growth.
- Level of growth is not planned in a way which would promote the Welsh Language at the community level in the Welsh Language Strongholds.

The Regional Growth Area Led (Focussed Growth) Spatial Option

4.44 The Regional Growth Area spatial option is a focussed growth spatial option that directs the largest proportions of growth to the Regional Growth Areas. Lower levels of growth are enabled in other parts of the Plan area, in accordance with the settlement hierarchy, local aspirations and identified needs.

The Key Elements of this Strategy are:

- The majority of development is focussed into the Regional Growth Area Clusters.
- Development outside of Regional Growth Area Clusters is distributed to address identified needs, to coincide with any employment growth and to reflect a Tier 1 settlement's role within Powys.
- Employment growth will be distributed to Commercial Market Areas, with higher levels of growth going to Commercial Market Areas that are within the Regional Growth Areas.
- Growth is distributed in accordance with the Settlement Hierarchy focusing on higher tier settlements and clusters where possible.

- Housing Market Areas outside of the Regional Growth Areas, that are constrained and have limited opportunities for development, will receive limited growth restricted to the levels needed to address needs identified in the LHMA.

Details:

4.45 The Regional Growth Area led spatial option gives priority to focusing development within the Regional Growth Areas as required in Future Wales. Development in the settlements, clusters and Housing Market Areas outside of the Regional Growth Area clusters, is at levels that support local aspirations, the Welsh Language and local needs.

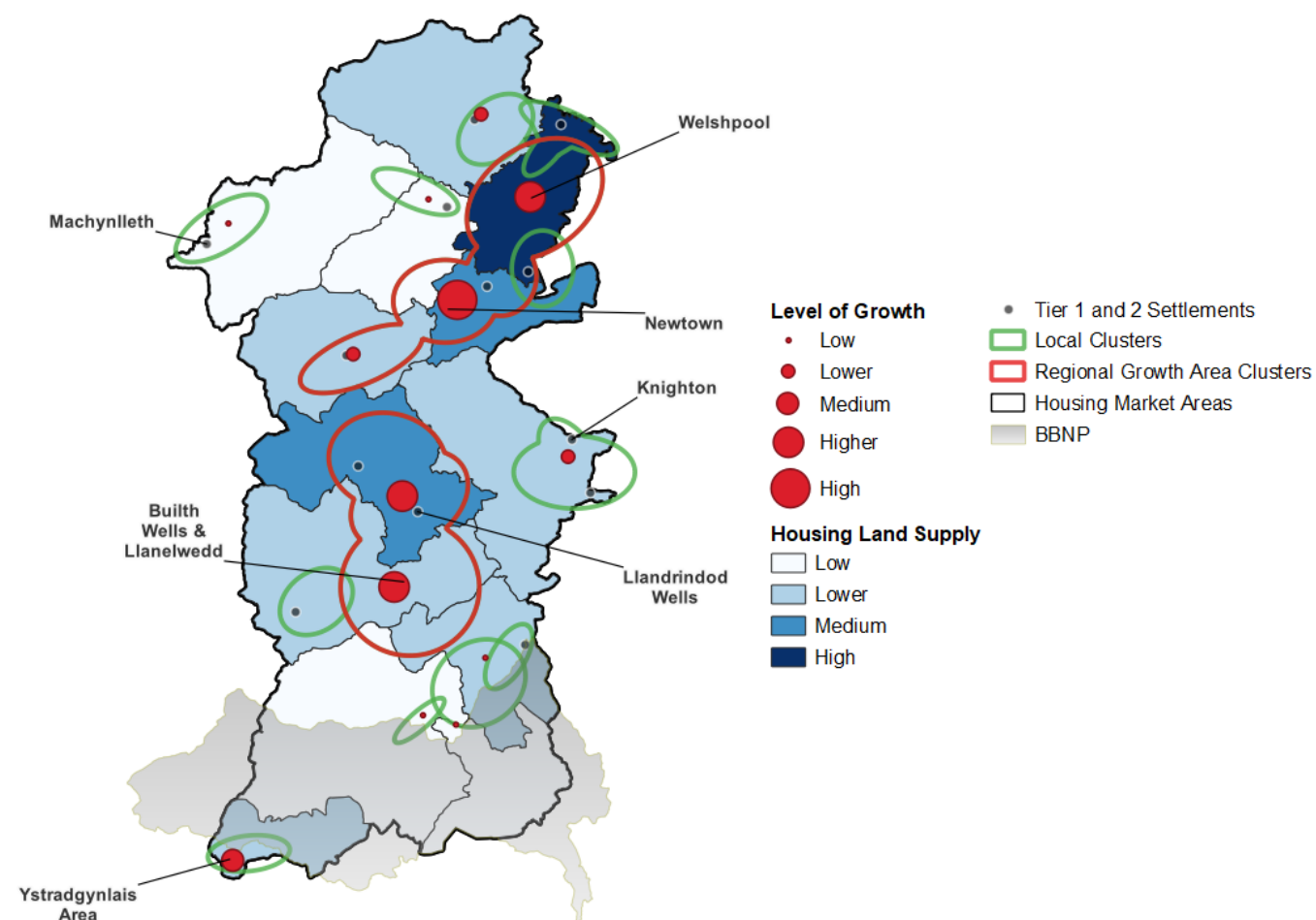
4.46 This spatial option gives priority to making sure development is directed to sustainable locations in the first instance, whilst making sure that an adequate supply of land will be available to address all needs identified in the LHMA (for both Open Market and Affordable dwellings). Where higher tiered settlements are constrained within Housing Market Areas this is reflected in the level of growth received. This option includes an element of flexibility that enables additional growth to be distributed to areas where social housing waiting lists are showing high levels of need that is not reflected in the LHMA.

4.47 Tier 1 and Tier 2 settlements within the Regional Growth Areas include for Bro Hafren - Welshpool, Newtown, Llanidloes and for the Heart of Wales - Llandrindod Wells, Builth Wells and Rhayader. Where these settlements are unable to accommodate the levels of growth required due to environmental constraints, infrastructure capacity and a lack of available land, it will be directed to other settlements within the cluster where a functional relationship has been demonstrated, in accordance with the settlement hierarchy.

4.48 Employment growth will be aligned to housing growth and focussed in to the Commercial Market Areas, with priority being given to those within the Regional Growth Areas. These include the A483 Spine North, Central Powys and part of the Rural West.

4.49 Figure 18 details the Regional Growth Area Led spatial option. As with the previous spatial options, the size of red circles is indicative of the levels of growth specific to each Housing Market Area, with growth being addressed through the Settlement Hierarchy and Clusters as appropriate.

Figure 18. Regional Growth Area Led Spatial Option



Advantages:

- Addresses all levels of need identified in the LHMA.
- Concentrates higher levels of growth to the Regional Growth Areas, sustaining services and infrastructure improvements.
- Alignment between employment and housing.
- Reduces the need to travel and focuses development where there are a range of sustainable transport opportunities.
- Support the aims and objectives of Future Wales.
- Levels of growth within the Welsh Language Strongholds can be planned sensitively to prevent negative impacts on the Welsh Language and to encourage the language to thrive.
- Stakeholders on the whole were supportive of this option.
- Includes flexibility to avoid constrained areas and to address any additional identified needs.

Disadvantages:

- Potential to overlook good sites outside of the Regional Growth Areas.
- Focussing increased development on a smaller number of settlements will place pressure on services and facilities in these areas.
- Limited ability to address the challenges facing rural communities relating to depopulation and demographics.

5. Integrated Sustainability Appraisal (ISA)

5.1 The Replacement LDP and proposals are subject to an Integrated Sustainability Appraisal (ISA). As part of the process of preparing the emerging Preferred Strategy, the Spatial Options were appraised against each of the ISA environmental, social and economic topics. The following provides a summary of the assessment. Further details are set out in the Initial ISA.

5.2 The ISA considered that the Regional Growth Area led option demonstrated the greatest potential alignment with the ISA objectives as a whole. Analysis of the Regional Growth Area led option concluded that it presented the most opportunity out of the four options when it came to matching demand for housing and its supply, delivering associated employment growth and realising opportunities for sustainable travel. The Regional Growth Area led option presented significant positive effects in respect of delivering housing growth (ISA Objective 1), enhancing economic opportunity (ISA Objective 2), improving health and well-being (ISA Objective 5) and enhancing green infrastructure provision (ISA Objective 14) and sustainable transport provision (ISA Objective 12) through investment opportunities. Equally, innovation in technologies such as decentralised heating networks, benefitting Powys' climate change response (ISA Objective 11) and making best use of previously developed land (ISA Objective 6) are considered to be more likely under concentrated growth scenarios.

5.3 The Adopted LDP (2011-2026), Affordable Housing Led and Population Apportionment led spatial options were considered by the ISA to bring compromises and some likely negative effects, when assessed against the various ISA Objectives. Most notable was the recognition that there would be less opportunities to make use of previously developed land (ISA Objective 6). In addition, it was considered that there could be negative effects in respect of the delivery of housing choices which meet the needs of all (ISA Objective 1) and economic development (ISA Objective 2) (in the case of the affordable housing-led option).

6. Recommended Spatial Strategy Option

6.1 It is important that the Preferred Strategy for the Replacement LDP aligns with Future Wales, Planning Policy Wales and Llŵbr Newydd, whilst addressing needs locally, particularly those associated with an ageing population and identified in the LHMA. It is also important that the Preferred Strategy addresses the aspirations and requirements of Powys residents, businesses and stakeholders, whilst providing the means to deliver on regional priorities such as the Mid Wales Growth Deal.

6.2 It is considered that the Regional Growth Area (focussed growth) spatial option is the best option to be taken forward as the Preferred Strategy for the Replacement LDP. This is the option that best aligns with Future Wales, Planning Policy Wales, Llŵbr Newydd, and stakeholder feedback. It will enable the delivery of the Replacement LDPs identified Vision and Objectives and recognises the Powys LPA area's role in the Mid Wales region.

6.3 The Regional Growth Area spatial option focuses the majority of growth (65% of new housing allocations) to the Regional Growth Areas whilst making sure that needs identified in the LHMA across the 13 Housing Market Areas are met. This focussed growth approach will include sufficient flexibility to avoid development being located in areas constrained by phosphates and flooding, support development in the Welsh speaking strongholds in a way that will encourage the Welsh language to thrive and enable newly arising needs such as those arising from social housing waiting lists or for specialist housing to be addressed.

6.4 The Regional Growth Area spatial option will be delivered using the sustainable settlement hierarchy and the identification of Regional Growth Area Clusters and Local Clusters. The 'Clusters' promote the concept of 'Living Locally', where new development can be located within walking / cycling distance or have a short journey via public transport to key everyday services. This in turn will reduce the need to travel and car usage, promote physical activity and the health and well-being of residents.

6.5 Settlements not included within the 'Clusters' are classified as being in Rural Areas. Development in these areas will be smaller in scale and distributed to the higher tiers of the settlement hierarchy. The focus will be on achieving sustainable rural communities, addressing identified needs, supporting the rural economy and promoting the development of sustainable linkages within and between rural settlements. Some small-scale development in these settlements may also help to support the Welsh Language by allowing local people to remain within their communities.

6.6 Table 13 shows how housing growth facilitated through allocated sites will be distributed between the Clusters and the Rural Areas, together with the components of the housing land supply. From Table 13 it can be seen that 65% of new allocated sites will be located within the Regional Growth Area Clusters. However, factoring in the housing land supply it can be anticipated that 55% of housing development will take place within the Regional Growth Area Clusters during the Replacement LDP plan period (2022-2037).

Table 13. Percentage Distribution of Development between Regional Growth Area Clusters, Local Clusters and Rural Areas.

	Regional Growth Area Clusters	Local Clusters	Rural Areas
Completions (2022 – 2024)	50%	22%	28%
Housing Commitments (Large Sites) - Units Not Started and Under Construction	58%	37%	5%
Projected units on Windfall Sites	45%	20%	35%
Units on Allocated Housing Sites	65%	25%	10%
% Distribution of Total (Target)	>55%	>25%	<20%

6.7 Employment Growth will be distributed across the Commercial Market Areas, with priority being given to those within / overlapping the Regional Growth Area Clusters and balancing the proportions of growth with the distribution of housing sites, whilst responding to needs arising from the Mid Wales Growth Deal.

6.8 Concentrating the majority of growth into the Regional Growth Area Clusters and Local Clusters will increase the viability of services and provide a focus for infrastructure improvements. This strategic option will also deliver on the Replacement LDP objectives relating to the climate and nature emergencies, reducing the need for unsustainable travel, and safeguard the Powys landscape and environment.

6.9 Table 14 sets out how the housing provision components will collectively deliver the Regional Growth Area strategic option. Table 15 does the same for the employment components. All employment growth will be directed to either Regional Growth Area clusters or Local Clusters, outside of these in the Rural Areas there will be a policy approach that permits development reflective of the requirements of a sustainable rural economy.

Table 14. Subdivision of Housing Provision Components to Deliver the Regional Growth Area Strategic Option.

	Regional Growth Area Clusters	Local Clusters	Rural Areas	Total
Completions (2022 – 2024)	301	133	169	603
Housing Commitments (Large Sites) - Units Under Construction	429	207	20	656
Housing Commitments (Large Sites) - Units Not Started (minus 44% Non-delivery allowance)	402	306	46	754
Projected units on Windfall Sites	654	291	509	1,454
Units on Allocated Housing Sites	873	336	134	1,343
Total Housing Provision	2,659	1,273	878	4,810
% Distribution of Total	55%	27%	18%	

* Large sites are sites with five dwellings or more.

Table 15. Subdivision of Employment Provision Components to Deliver the Regional Growth Area Strategic Option.

	Regional Growth Area Clusters	Local Clusters	Total
Committed Supply	5.8	2.36	8.16
Allocated Sites	18.5	13.5	32
Total	24.3	15.86	40.16
% Distribution of Total	60%	40%	

Appendix 1 – Assessment Against Future Wales Policies

The table below details the levels of alignment of the different spatial options with the policies set out in Future Wales.

- High = Strategy would strongly accord with Future Wales policy.
- Medium = Strategy would accord with some elements of Future Wales policy.
- Neutral = Strategy would have a neutral effect on Future Wales policy / policy not assessed.
- Low = Strategy would conflict with some elements of Future Wales Policy.
- Conflict = Strategy would strongly conflict with Future Wales Policy.

Future Wales Policy	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
1. Where Wales will grow	Medium	Medium	Medium	High
2. Shaping Urban Growth and Regeneration – Strategic Placemaking	High	High	High	High
3. Supporting Urban Growth and Regeneration – Public Sector Leadership	High	High	High	High
4. Supporting Rural Communities	Medium	Medium	High	High
5. Supporting the Rural Economy	Medium	Medium	High	Medium

Future Wales Policy	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
6. Town Centre First	Medium	Neutral	Medium	High
7. Delivering Affordable Homes	Low	High	Medium	High
8. Flooding	Low	Neutral	Neutral	High
9. Resilient Ecological Networks and Green Infrastructure	Low	Medium	Medium	High
10. International Connectivity	Neutral	Neutral	Neutral	Neutral
11. National Connectivity	Low	Medium	Medium	High
12. Regional Connectivity	Low	Medium	Medium	High
13. Supporting Digital Communications	Neutral	Neutral	Neutral	Neutral
14. Planning in Mobile Action Zones	Neutral	Neutral	Neutral	Neutral
15. National Forest	Neutral	Neutral	Neutral	Neutral
16. Heat Networks	Low	Low	Low	Medium

Future Wales Policy	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
17. Renewable and Low Carbon Energy and Associated Infrastructure	Neutral	Neutral	Neutral	Neutral
18. Renewable and Low Carbon Energy Developments of National Significance	Neutral	Neutral	Neutral	Neutral
19. Strategic Policies for Regional Planning	Medium	High	High	High
25. Regional Growth Areas – Mid Wales	Low	Medium	Medium	High
26. Growing the Mid Wales Economy	Neutral	Low	High	High
27. Movement in Mid Wales	Neutral	Neutral	Medium	High

Appendix 2 – Assessment Against Replacement LDP Objectives

The table below details the levels of alignment of the different spatial options with the Replacement LDP Objectives.

- High = Strategy would support the achievement of the Objective.
- Medium = Strategy would support the achievement of some elements of the Objective.
- Neutral = Strategy would have a neutral effect in delivering the Objective / not assessed.
- Low = Strategy would reduce the Replacement LDPs ability to achieve the objective.
- Conflict = Strategy would strongly conflict with the Objective.

Objective	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
Objective 1 – Climate Change	Neutral	Medium	Medium	Medium
Objective 2 – Nature Recovery	Medium	Medium	Medium	Medium
Objective 3 – Natural, Historic, and Built Environments	Medium	Medium	Medium	Medium
Objective 4 – Mineral Resources	Medium	Medium	Medium	Medium
Objective 5 – Sustainable Travel	Low	Medium	Medium	High
Objective 6 – Placemaking	Low	Medium	Medium	High
Objective 7 – Sustainable Growth	Low	Medium	Medium	High

Objective	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
Objective 8 – Health and Well-being	Low	Medium	High	High
Objective 9 – Sustainable Settlements and Communities	Medium	High	High	High
Objective 10 – Meeting Future Needs	Medium	Medium	High	High
Objective 11 – Welsh Language	Medium	Neutral	Medium	High
Objective 12 – Housing Needs	Neutral	Neutral	High	High
Objective 13 – Community Facilities and Assets	Medium	Neutral	High	High
Objective 14 – Vibrant Economy	Neutral	Neutral	High	High
Objective 15 – Economic Development	Neutral	Neutral	High	High
Objective 16 – Mid Wales Growth Deal	Low	Low	High	High
Objective 17 - Tourism	Neutral	Neutral	Neutral	Neutral

Objective	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
Objective 18 – Town Centres	High	Neutral	Medium	High
Objective 19 – Infrastructure, Utility and Service Provision Required for New Development	Neutral	Low	Medium	High
Objective 20 – Provision of Infrastructure and Digital Connectivity Projects	Neutral	Low	Medium	High
Objective 21 – Energy and Decarbonisation	Neutral	Neutral	Neutral	Medium
Objective 22 – Waste	Neutral	Neutral	Neutral	Neutral

Appendix 3 – Assessment Against National Sustainable Placemaking Outcomes

The table below details the levels of alignment of the different spatial options with the National Sustainable Placemaking Outcomes.

- High = Strategy would support the achievement of the Outcome.
- Medium = Strategy would support the achievement of some elements of the Outcome.
- Neutral = Strategy would have a neutral effect in delivering the Outcome / not assessed.
- Low = Strategy would reduce the Replacement LDPs ability to achieve the Outcome.
- Conflict = Strategy would strongly conflict with the Outcome.

Outcome	Adopted LDP	Affordable Housing Led	Population Apportionment Led	Regional Growth Area Led
Creating and Sustaining Communities	High	Low	High	High
Making Best Use of Resources	Medium	High	Medium	High
Maximising Environmental Protection and Limiting Environmental Impact	High	High	High	High
Facilitating Accessible and Healthy Environments	Medium	Medium	Medium	High
Growing Our Economy in a Sustainable Manner	Medium	Low	Medium	High