



Powys County Council

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# Powys Replacement Local Development Plan

Preferred Strategy - Initial Integrated  
Sustainability Appraisal Non-Technical Summary

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Powys County Council

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# **Powys Replacement Local Development Plan**

Preferred Strategy - Initial Integrated Sustainability Appraisal  
Non-Technical Summary

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# 1 Introduction

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- 1.1.1 Powys County Council is preparing the Replacement Local Development Plan (2022-2037)<sup>1</sup> which will replace the Adopted Local Development Plan (LDP) (2011-2026).<sup>2</sup> The Replacement Local Development Plan (hereafter referred to as 'RLDP') will set out how much new development will be accommodated in the Powys Local Planning Authority area to 2037, specifying where this growth will be located. The RLDP will also set out the policy framework for managing development proposals.
- 1.1.2 As part of plan preparation, the Council is required to carry out an Integrated Sustainability Appraisal (ISA)<sup>3</sup>, to ensure that the likely social, economic and environmental effects of the RLDP are identified, described and appraised.
- 1.1.3 The ISA brings together Sustainability Appraisal and Strategic Environmental Assessment (SEA), as well as Welsh Language Impact Assessment (WLIA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). A Habitats Regulations Assessment (HRA) is also being carried out and presented alongside the ISA. For further details on the ISA process please refer to the main Initial ISA Report.

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<sup>1</sup> Replacement Local Development Plan (2022 - 2037) - Powys County Council

<sup>2</sup> Adopted LDP (2011 - 2026) - Powys County Council

<sup>3</sup> Welsh Government (2019) The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

## 2 The Replacement Local Development Plan

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- 2.1.1 The RLDP will contain policies and proposals which will provide for the County's development needs and aspirations, whilst protecting and enhancing social, cultural and environmental assets, and will be prepared in accordance with the Welsh Government Local Development Plan (LDP) Manual (Edition 3, 2020).
- 2.1.2 Preparation of the RLDP included a series of internal engagement exercises and a public consultation (January 2024) resulting in the identification of 20 key issues and 22 objectives.
- 2.1.3 In response to the Key Issues, the following Vision has been defined for the Powys Replacement LDP.

*“By 2037, the Powys plan area will be:*

*A place of vibrant, thriving and well-connected communities including prosperous towns and villages, accommodating the sustainable growth of both new homes and jobs, and providing good access to services and employment opportunities.*

*Part of a more productive, enterprising and distinctive region that supports existing businesses, an expanded economy, and better job prospects based on innovation allied to a skilled workforce. Foundational economic sectors, including farming, tourism, and recreation and leisure, will continue their key roles and the rural economy will be resilient and diverse.*

*Benefiting from a strategic approach to Green Infrastructure, ensuring it is promoted and protected for multiple benefits to both wildlife and people, and facilitating improved ecological networks.*

*By 2037,*

*Communities across the plan area will have developed in a way which enable and support:*

- Age-balanced communities living well in places which meet social, economic, Welsh language and cultural needs.*
- Nature to flourish through net benefit for biodiversity and resilient ecosystems.*
- Adaptation to climate change and the transition towards net zero.*

*Residents will live safer, healthier, and greener lives through the provision of well-designed developments within an outstanding physical and cultural environment. The wealth of resources within the natural, built, and historic environments, including iconic landscapes, will be maintained, protected, enhanced and valued, shaping a sustainable land-use legacy for the future.”*

- 2.1.4 Further details on the Key Issues and Objectives can be found in the main Initial ISA Report.



### 3 ISA Scope and Methodology

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- 3.1.1 Preparation of the ISA Scoping Report is the first stage in the ISA, identifying issues, objectives and a framework for assessment of the likely effects of the policies and proposals of the RLDP.
- 3.1.2 The baseline information and policy context presented in the Final ISA Scoping Report (see Appendix A of the main Initial ISA Report) informed the identification of a number of key issues under each of the ISA topics. ISA objectives and guide questions were then developed to address the identified key issues and guide the appraisal of the Preferred Strategy.



Table 3-1 – ISA Framework

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
<b>Population &amp; Communities</b>	ISA Objective 1: To provide good quality homes and community infrastructure to meet identified needs	<ul style="list-style-type: none"> <li>■ Meet the identified housing needs, including affordable and specialist requirements?</li> <li>■ Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community?</li> <li>■ Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> <li>■ Promote the development of a range of high quality, accessible community facilities, including specialist services?</li> </ul>	<ul style="list-style-type: none"> <li>■ A Wales of cohesive communities</li> <li>■ A healthier Wales</li> <li>■ A more equal Wales</li> </ul>
<b>Economy &amp; Employment</b>	ISA Objective 2: To create and support a strong, diverse and resilient economy and workforce	<ul style="list-style-type: none"> <li>■ Provide sufficient land for businesses to grow?</li> <li>■ Support the creation of accessible new jobs and training opportunities?</li> <li>■ Ensure the capacity of educational facilities keep pace with population growth?</li> <li>■ Enhance the vitality and resilience of communities?</li> <li>■ Safeguard existing employment areas?</li> <li>■ Create opportunities for and promote sustainable tourism, sensitively capitalising on environmental, cultural, heritage and leisure assets?</li> <li>■ Create opportunities for enhancements to the rural economy and rural diversification (including agriculture, forestry, small and medium sized</li> </ul>	<ul style="list-style-type: none"> <li>■ A prosperous Wales</li> <li>■ A resilient Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> </ul>



ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
		employers (SMEs), micro businesses and the development of digital connectivity)?	
<b>Equality, Diversity &amp; inclusion</b>	ISA Objective 3: To reduce poverty and inequality; tackle social exclusion and promote community cohesion	<ul style="list-style-type: none"> <li>■ Assist with providing employment and training opportunities for those most in need?</li> <li>■ Help to tackle poverty and inequality to support well-being?</li> <li>■ Address directly and indirectly areas suffering deprivation and/or decline?</li> <li>■ Help to provide better education opportunities and attainment?</li> </ul>	<ul style="list-style-type: none"> <li>■ A healthier Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> </ul>
<b>The Welsh Language</b>	ISA Objective 4: To protect, promote and enhance the Welsh language and culture	<ul style="list-style-type: none"> <li>■ Affect the number who can speak Welsh and/or opportunities for persons to use the Welsh language daily (both positive and/or adverse effects)?</li> <li>■ Affect the sustainability of Welsh speaking communities (both positive and/or adverse effects)?</li> <li>■ Affect Welsh medium education and Welsh learners of all ages, including adults (both positive and/or adverse effects)?</li> <li>■ Affect services available in Welsh (both positive and/or adverse effects)? (e.g. health and social services, transport, housing, digital, youth, infrastructure, environment, local government etc.)</li> </ul>	<ul style="list-style-type: none"> <li>■ A Wales of vibrant culture and thriving Welsh Language</li> <li>■ A Wales of cohesive communities</li> </ul>

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
<b>Health &amp; Well-Being</b>	ISA Objective 5: To improve the health and well-being of all sectors of society	<ul style="list-style-type: none"> <li>■ Contribute towards an improvement in access to health and social care services especially in isolated/rural areas?</li> <li>■ Contribute towards a reduction in health inequalities amongst different groups in the community including specifically children and older people?</li> <li>■ Contribute towards healthy lifestyles and promote well-being including walking and cycling?</li> <li>■ Contribute towards improving access to natural green space, wildlife, open space including opportunities for play, leisure and recreation?</li> <li>■ Contribute towards an increase in green infrastructure?</li> <li>■ Ensure new development is designed to reduce crime and the fear of crime?</li> </ul>	<ul style="list-style-type: none"> <li>■ A prosperous Wales</li> <li>■ A resilient Wales</li> <li>■ A healthier Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> </ul>
<b>Land Use, Soils &amp; Geology</b>	ISA Objective 6: To make the best use of previously developed land and existing buildings and protect higher grade agricultural land	<ul style="list-style-type: none"> <li>■ Create opportunities to develop previously developed land where this will have no adverse impacts on Open Mosaic Habitats?</li> <li>■ Protect the Best and Most Versatile land from development?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A healthier Wales</li> </ul>
<b>Water</b>	ISA Objective 7: To conserve, protect and	<ul style="list-style-type: none"> <li>■ Reduce water consumption?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A healthier Wales</li> </ul>

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
	enhance water quality and water resources	<ul style="list-style-type: none"> <li>▪ Ensure an adequate supply of water can be provided considering current and future projections of water availability and water use?</li> <li>▪ Be delivered without causing deterioration in water quality in rivers and streams?</li> <li>▪ Lead to an improvement in water quality in the SAC river catchments?</li> <li>▪ Reduce the potential for agricultural practices to contribute towards nutrient-based pollution of waterbodies and courses?</li> </ul>	
<b>Air</b>	ISA Objective 8: To minimise or reduce the sources and effects of air pollution	<ul style="list-style-type: none"> <li>▪ Reduce the need to travel?</li> <li>▪ Encourage journeys to be made by sustainable means (active travel or public transport)?</li> <li>▪ Avoid any adverse effects on air quality and for people exposed to poor air quality?</li> <li>▪ Improve air quality in areas identified as of concern?</li> <li>▪ Promote and facilitate the use of electric vehicles?</li> <li>▪ Promote and facilitate enhancements to green infrastructure networks to facilitate increased absorption and dissipation of NOx and other pollutants?</li> </ul>	<ul style="list-style-type: none"> <li>▪ A resilient Wales</li> <li>▪ A healthier Wales</li> <li>▪ A more equal Wales</li> <li>▪ A globally responsible Wales</li> </ul>
<b>Waste &amp; Resource Use</b>	ISA Objective 9: To minimise waste generation, encourage re-use and recycling	<ul style="list-style-type: none"> <li>▪ Promote the remediation of contaminated land and prevention of further contamination?</li> <li>▪ Create opportunities to increase the proportion of waste recycling and re-use?</li> </ul>	<ul style="list-style-type: none"> <li>▪ resilient Wales</li> <li>▪ A healthier Wales</li> <li>▪ A globally responsible Wales</li> </ul>

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
	and promote efficient use of mineral resources	<ul style="list-style-type: none"> <li>■ Promote opportunities to use recycled and secondary materials in construction?</li> <li>■ Promote the use of locally sourced sustainable materials?</li> <li>■ Safeguard mineral resources?</li> </ul>	
<b>Climate Change (adaptation)</b>	ISA Objective 10: To support the resilience of Powys to the potential effects of climate change, including flooding and other extreme events	<ul style="list-style-type: none"> <li>■ Avoid development in areas at risk of flooding, taking into account the likely future effects of climate change?</li> <li>■ Increase resilience of the built and natural environment to the effects of climate change?</li> <li>■ Ensure that the potential risks associated with climate change are considered in new developments?</li> <li>■ Improve and extend green infrastructure networks to support climate change adaptation?</li> <li>■ Sustainably manage water run-off, reducing surface water runoff?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> <li>■ A globally responsible Wales</li> </ul>
<b>Climate Change (mitigation)</b>	ISA Objective 11: To reduce the contribution to climate change from greenhouse gas emissions	<ul style="list-style-type: none"> <li>■ Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>■ Reduce energy consumption from non-renewable sources?</li> <li>■ Generate energy from low or zero carbon sources?</li> <li>■ Reduce the need to travel or the number of journeys made?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> <li>■ A globally responsible Wales</li> </ul>

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
		<ul style="list-style-type: none"> <li>■ Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>■ Ensure that development does not contribute towards further increases in high energy use and unsustainable travel?</li> <li>■ Improve the provision of nature-based solutions to adapt and mitigate climate change?</li> </ul>	
<b>Transport &amp; Movement</b>	ISA Objective 12: To promote sustainable transport use and reduce the need to travel	<ul style="list-style-type: none"> <li>■ Reduce the need to travel through sustainable patterns of land use and development?</li> <li>■ Encourage modal shift to more sustainable forms of travel?</li> <li>■ Enable transport infrastructure improvements?</li> <li>■ Support the uptake of low carbon transport?</li> <li>■ Contribute towards the electric vehicle (EV) charging network?</li> <li>■ Facilitate working from home and remote working?</li> <li>■ Provide improvements to and/or reduce congestion on the existing highway network?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> <li>■ A Wales of vibrant culture and thriving Welsh Language</li> <li>■ A globally responsible Wales</li> </ul>
<b>Historic Environment</b>	ISA Objective 13: To preserve and enhance the Powys' heritage resource, including built and archaeological assets	<ul style="list-style-type: none"> <li>■ Conserve and enhance the significance of buildings and structures of architectural, historic and cultural interest, both designated and non-designated, and their setting?</li> <li>■ Conserve and enhance the special interest, character and appearance of Conservation Areas and their settings?</li> </ul>	<ul style="list-style-type: none"> <li>■ A resilient Wales</li> <li>■ A more equal Wales</li> <li>■ A Wales of cohesive communities</li> <li>■ A Wales of vibrant culture and thriving Welsh Language</li> </ul>

ISA Topic	ISA Objective	Guide questions ( <i>Will the policy or proposal ...</i> )	Supporting National Well-Being Goals
		<ul style="list-style-type: none"> <li>▪ Ensure that Welsh place names are recognised as integral features of the cultural and historic landscape of Wales?</li> <li>▪ Conserve and enhance archaeological remains, and archaeologically sensitive areas?</li> </ul>	
<b>Biodiversity, Green Infrastructure &amp; Geodiversity</b>	ISA Objective 14: To conserve and enhance biodiversity and geodiversity and promote improvements to the multifunctional green infrastructure network	<ul style="list-style-type: none"> <li>▪ Minimise impacts on biodiversity and provide net benefits where possible?</li> <li>▪ Protect and enhance ecological networks, including those that cross administrative boundaries?</li> <li>▪ Protect geologically valuable sites, including their setting?</li> </ul>	<ul style="list-style-type: none"> <li>▪ A Resilient Wales</li> <li>▪ A Healthier Wales</li> <li>▪ A Globally Responsible Wales</li> </ul>
<b>Landscape &amp; Townscape</b>	ISA Objective 15: To protect the quality and diversity of designated and local landscapes and townscapes	<ul style="list-style-type: none"> <li>▪ Ensure that Powys' valued landscapes and townscapes are conserved and enhanced?</li> <li>▪ Ensure that Welsh place names are recognised as integral features of the cultural and historic landscape of Wales?</li> <li>▪ Ensure that design quality is considered as part of all development activity?</li> </ul>	<ul style="list-style-type: none"> <li>▪ A Prosperous Wales</li> <li>▪ A Resilient Wales</li> <li>▪ A Healthier Wales; A More Equal Wales</li> <li>▪ A Wales of Cohesive Communities</li> <li>▪ A Wales of Vibrant Culture and Thriving Welsh Language</li> <li>▪ A Globally Responsible Wales</li> </ul>

## 4 ISA of Vision and Objectives

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- 4.1.1 A compatibility assessment of the RLDP's vision and objectives against the ISA Objectives was carried out. The findings of this showed that the ISA Objectives are broadly supported by the RLDP vision and one or more of the RLDP Objectives and vice versa, which suggests that they are compatible and mutually reinforcing.
- 4.1.2 Overall, positive relationships are identified, particularly in respect of the provision of housing, economic development, health and wellbeing, sustainable development, biodiversity and landscape protection, these reflecting some of fundamental intentions of the delivery of the RLDP.
- 4.1.3 There are various uncertainties identified relating to the compatibility of economic development with sustainable development aspirations, particularly in respect of the promotion of sustainable transport and climate change mitigation measures, reflecting the potential challenges associated with the transition to a low-carbon society. The detail of policy and its implementation will be important in resolving such uncertainties.
- 4.1.4 No negative relationships have been identified, suggesting that both the ISA and the RLDP are largely in alignment in their consideration of the range and intent of objectives.

## 5 ISA of Strategic Options

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- 5.1.1 A number of different options were explored in terms of the amount of housing and employment to be delivered and how it could be distributed across Powys during the plan period. These options and the appraisal of them through the ISA informed the development of the Preferred Strategy.
- 5.1.2 Three growth options were identified (high, medium and low) and these explored different levels of housing and employment growth that could be delivered during the plan period. The ISA found that of the three options for growth in Powys, the higher-growth option performed more strongly, reflecting the opportunity to meet demands for housing, reduction of disadvantage and potentially the reinforcement of Welsh language and culture through enabling locals to find housing. The lower- and middle-growth options, whilst performing positively against many of the ISA Objectives, cumulatively are less positive by virtue of providing fewer opportunities to achieve the wider benefits likely to be associated with the higher-growth option. In all cases, whilst there are a range of uncertainties identified (with, for example biodiversity impacts which reflects the influence of local circumstances), no negative effects were identified. This reflects that the need for housing and employment is relatively low once existing developments are taken into consideration.
- 5.1.3 Four options for the distribution of housing and employment growth across Powys were explored and these are:
- **Continuation of the Powys Adopted LDP (2011-2026) Strategy** - promotes 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.
  - **Affordable Housing Led** - in which all 'new' housing allocations are for affordable housing, distributed in accordance with the recognised need across each Local Housing Market Area (LHMA)).
  - **Population Apportionment (Dispersed Growth)** - in which 'new' housing is distributed across the LHMA's in proportion to the population in each LHMA.
  - **Regional Growth Area Led (Focused Growth)** - in which the majority of 'new' housing is distributed to settlements in Regional Growth Area Clusters (RGAs), with lower levels of growth enabled within settlements in Local Clusters whilst development in other parts of the plan area will be proportionate and appropriate to meet identified needs and support sustainable rural communities.
- 5.1.4 The ISA found that the Regional Growth Area Led option demonstrates the greatest potential alignment with the ISA objectives as a whole, which reflects the opportunity to match demand for housing and its supply, delivery of associated employment growth and realising opportunities for the sustainable travel. The option presents significant positive effects in respect of delivering housing growth (Population & Communities), enhancing economic opportunity (Economy & Employment), improving health & well-being (Health &





Well-Being) and enhancing green infrastructure provision (Biodiversity, Green Infrastructure & Geodiversity) and sustainable transport provision (Transport & Movement)) through investment opportunities. Equally, innovation in technologies such as decentralised heating networks, benefitting Powys' climate change response (Climate Change mitigation) and making best use of previously developed land (Land Use, Soils & Geology) are more likely under concentrated growth scenarios.

- 5.1.5 The Adopted LDP strategy, Affordable Housing Led and Population Apportionment Led spatial options bring compromises and some likely negative effects, against various ISA Objectives, notably in respect of fewer opportunities for the use of previously developed land (Land Use, Soils & Geology). In addition, there are likely to be negative effects in respect of the delivery of housing choices which meet the needs of all (Population & Communities) and economic development (Economy & Employment) (in the case of affordable housing-led option).
- 5.1.6 Two Spatial Options for employment were also identified for consideration as follows:
- **Commercial Market Areas** - distributed acknowledging location of existing employment sites as per Adopted LDP (Existing employment sites will be safeguarded; Adopted LDP policy allowing extensions to existing sites to be incorporated into RLDP).
  - **Market-led** - distributed as per Market Demand.
- 5.1.7 The ISA found that the distribution options for employment favour a Commercial Market Area-led strategy (using four identified market areas of A483 Spine North, Rural West, Central Powys and Border Areas) informed by the distribution of employment sites close to or within higher tier settlements in the Adopted LDP. This is in contrast to an unfettered market-led approach, reflecting the greater likelihood of providing a balanced response to identified need. A Market Led approach could result in unintended consequences associated with development not reflecting a wide range of considerations, such as the need to provide a broad range of employment opportunities near to where people live (Economy & Employment and Equality, Diversity & Inclusion) and lessened opportunities for the mitigation of negative effects such as traffic emissions (Air).

## 6 ISA of the Preferred Strategy including Strategic Policies

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- 6.1.1 The appraisal found that the Preferred Strategy (including Strategic Policies) performed positively against the majority of ISA objectives. In particular against the population and communities and economy and employment ISA objectives with significant long-term positive effects, through the delivery of new homes, employment opportunities and associated community infrastructure to meet the needs of communities. Additionally, minor positive effects were identified for the Welsh Language ISA objective as the Preferred Strategy seeks to deliver proportionate levels of new homes and employment opportunities within Welsh language strongholds in the north-west and south-west of Powys, seeking to support the Welsh language where it is an integral part of the social fabric.
- 6.1.2 Neutral effects were identified for ISA objectives relating to the quality of air and water. While the scale and broad distribution of growth is not considered likely to have a negative effect, the Preferred Strategy is not considered likely to result in a positive effect at this stage.
- 6.1.3 There is an element of uncertainty for all ISA objectives given the strategic nature of the Preferred Strategy and that the precise location of development is not known at this stage. This is particularly the case for the ISA objectives relating to the historic environment, biodiversity, green infrastructure and geodiversity, as the nature and scale of effects will be dependent on the precise location, scale and design of development.



## 7 Next Steps

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- 7.1.1 This Non-Technical Summary and the Initial ISA Report will accompany the Preferred Strategy Document for public consultation from 19<sup>th</sup> August to 7<sup>th</sup> October 2024. Any comments received will be taken into account as part of the iterative plan-making and ISA process.
- 7.1.2 The representations received along with further ISA work, including the appraisal of candidate sites, will inform the development of the Deposit Plan. An updated Non-Technical Summary and ISA Report will accompany the Deposit Plan on public consultation.



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