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**Adroddiad i Awdurdod  
Parc Cenedlaethol bannau  
Brycheiniog**

**Report to Brecon Beacons  
National Park Authority**

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Arolygydd a benodir gan Weinidogion Cymru

an Inspector appointed by the Welsh Ministers

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 64

**REPORT ON THE EXAMINATION INTO THE  
BRECON BEACONS NATIONAL PARK  
LOCAL DEVELOPMENT PLAN 2007 - 2022**

Plan submitted for examination on 26 October 2011

Examination hearings held between 15 January and 28 March and on 5 September 2013

Cyf ffeil/File ref: LDP-11-515464

## Summary

This report concludes that, subject to the recommended Matters Arising Changes (MACs) set out in Appendix A, the Brecon Beacons National Park Local Development Plan 2007 – 2022 (LDP) provides an appropriate basis for the planning of the National Park up to 2022. The National Park Authority (NPA) has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements. The main changes are summarised below:

- Clarification of how the concept of ‘environmental capacity’ reflects the Welsh Government’s principles of sustainability;
- Additional land allocated for housing, employment and mixed-use development;
- Sites CS136, CS137 and DBR-HOW-K not allocated due to delivery constraints;
- A reduced number of houses anticipated on some sites due to delivery constraints;
- Deletion of the 10% affordable housing requirement in the Heads of the Valleys and Rural South sub-market;
- Changes to Policy SP6 and deletion of Policy 15 to require affordable housing rather than local needs housing in Level 4 ‘Limited Growth’ Settlements;
- Changes to policies requiring higher than national standards for sustainable design so that they are consistent with national planning policy requirements;
- Increased flexibility in Policies B LP1 and K LP1 for the requirement for Lifetime Homes Standards to be applied where appropriate and where it would not jeopardise delivery;
- New employment Policies 17 and 19 to support businesses seeking to expand;
- Changes to the Hay-on-Wye Retail Centre boundary;
- The primary/core road network to be shown on the Proposals Map;
- Increased clarity for Policy 35 to show that planning obligations will be assessed on a case by case basis and prioritised in line with LDP objectives;
- Changes to policy wording to reflect national planning policy more closely; and
- Changes to the Monitoring Framework developing the targets and indicators in more detail to improve monitoring.

In conclusion, with these recommended changes, the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in LDP Wales.

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## 1 Introduction

- 1.1 Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a Local Development Plan (LDP) is to determine:
- (a) whether it satisfies the requirements of sections 62 and 63 of the Act and of regulations under section 77 and;
  - (b) whether it is sound.
- 1.2 This report contains the assessment of the Brecon Beacons National Park Local Development Plan 2007 - 2022 (LDP) in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the Act. In addition to the requirements of the Act and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, the Plan has been considered against the soundness tests in paragraph 4.35 of *Local Development Plans (LDP) Wales, 2005*. Alongside the procedural tests, these go to matters of consistency and of coherence and effectiveness.
- 1.3 Since the purpose of the examination is to determine whether the Plan is sound the changes recommended in this binding report are made only where it is concluded that there is a need to amend the Plan in the light of the legal requirements and/or the tests of soundness. The changes that are recommended are in line with the substance of the overall Plan and its policies, and do not undermine its objectives or the Sustainability Appraisal (SA) and participatory processes that have been undertaken.
- 1.4 All duly made representations and the matters raised at the Hearings have been considered. However, given the focus of the examination on soundness specific representations are referred to only where it is considered that they raise substantive issues concerning the Plan's soundness. Amendments to the Plan sought by representors are the subject of a recommended change only where it has been found that such a change is required.

### *Post-Deposit Changes*

- 1.5 Prior to submission of the LDP for examination the NPA considered the representations received and decided to make a number of Focussed Changes (FCs) to the Plan. These changes were duly advertised and the responses taken into account. At the Exploratory Meeting, the NPA agreed to undertake additional work<sup>1</sup> and proposed a series of changes to the Plan to address concerns that I had raised<sup>2</sup>. Subsequently the NPA advertised these as

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<sup>1</sup> Additional Work as agreed at the Exploratory Meeting (August 2012)

<sup>2</sup> Examination Document P/2 'Inspector's Preliminary Note 1' & Examination Document P/5 'Inspector's Preliminary Note 2'

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Additional Focussed Changes (AFCs) and the responses were considered.

- 1.6 At the Pre-Hearing Meeting the NPA confirmed that the Plan it wishes to be examined is the deposit LDP as modified by the proposed Focussed Changes (October 2011)<sup>3</sup> and the proposed Additional Focussed Changes (August 2012)<sup>4</sup> schedules. Since the changes within these schedules have been the subject of consultation and the SA assessed where necessary,<sup>5</sup> they are accepted as part of the submitted LDP. The deposit Plan as modified by the FCs and AFCs therefore formed the starting point for the examination of the Plan's soundness. This composite document is referred to hereinafter as the LDP or Plan.

### *Recommended Changes*

- 1.7 In April 2013 I issued my preliminary findings in relation to the supply of housing and employment land. This identified, in summary, that additional land for housing and employment would be required for the Plan to be sound. The NPA responded by proposing a series of changes, in addition to the changes referred to above, which seek to increase the housing and employment provision by a combination of amending existing allocations and by including some of the previously suggested 'alternative' sites. These changes, together with the associated revised SA information, were the subject of public consultation between June and July 2013. I have considered the responses to the consultations in preparing the report.
- 1.8 The recommended changes are based on the changes which the NPA has submitted in response to my preliminary findings and to other matters raised during the examination. These have been consolidated into a schedule of Matters Arising Changes (MACs) and are set out in Appendix A of this report. The MACs highlighted with bold type in the Appendix are changes or modifications that are required to ensure that the Plan is sound and I recommend these changes accordingly. These MACs are addressed in this report and are also shown in bold type.
- 1.9 The other MACs in Appendix A are not required to make the Plan sound, though they would improve the Plan's clarity, precision and presentation. However, as they are not essential to the Plan's soundness they are outside my remit. Ultimately it is a matter for the NPA to determine whether it is able to incorporate these other changes into its Plan at this stage. The changes are shown in non-bold type both in the report and in Appendix A. They are also shaded grey in the Appendix.

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<sup>3</sup> Brecon Beacons Local Development Plan: Schedule of Focussed Changes (October 2011)

<sup>4</sup> Brecon Beacons Local Development Plan: Schedule of Additional Focussed Changes (August 2012)

<sup>5</sup> As advised by Examining Local Development Plans Procedure Guidance (The Planning Inspectorate Wales)

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- 1.10 For the avoidance of doubt, the NPA is also authorised to make any necessary minor editorial changes to the Plan arising from the inclusion of the changes recommended by this report.
- 1.11 Edition 5 of Planning Policy Wales – as updated November 2012 (PPW) was published during the examination. The changes in national policy were discussed at the Hearings and do not raise issues which affect the soundness of the Plan. However, some changes to the Plan have been proposed by the NPA to maintain consistency with national policy which I recommend. The changes are included in the MAC Schedule.

## **2 Procedural Tests**

- 2.1 The LDP has been prepared in accordance with the Delivery Agreement (as revised by agreement with the Welsh Government<sup>6</sup>) and the Community Involvement Scheme (CIS) as demonstrated in the Consultation Report<sup>7</sup>. It has had regard to the National Park Management Plan (NPMP).
- 2.2 The CIS identified a number of methods of engagement and consultation for the LDP. The Consultation Report sets out what consultation methods were used up to the Deposit Plan stage. In addition, Visioning Stakeholder Workshops took place at the initial assessment stage of the LDP process to inform the objectives and development strategies of the Plan. The NPA commissioned Planning Aid Wales to train Community Councils in the LDP process and to mediate at Community Council engagement sessions at an early stage. All proposed changes made to the Deposit Plan, as outlined in the above Introduction, have been advertised and consulted on.
- 2.3 Accordingly, I am satisfied that the Plan complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 including requirements in relation to consultation, advertisement and the publication and availability of prescribed documents.
- 2.4 The Plan has been subject to SA including Strategic Environmental Assessment (SEA)<sup>8</sup>. FCs<sup>9</sup>, AFCs<sup>10</sup> and further changes<sup>11</sup> put forward by the NPA as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA.

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<sup>6</sup> Submission of agreed revised timetable to Welsh Government August 2011

<sup>7</sup> Local Development Plan Consultation Report: October 2011

<sup>8</sup> Sustainability Appraisal of Deposit LDP (incorporating SEA): November 2010

<sup>9</sup> Addendum to Sustainability Appraisal – Focussed Change Assessment: October 2011

<sup>10</sup> Additional Focussed Changes to the Deposit LDP Sustainability Appraisal Report Addendum: September 2012

<sup>11</sup> Matters Arising Schedule of Changes (version 5)

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- 2.5 In accordance with the Habitats Directive<sup>12</sup> a Habitats Regulations Assessment (HRA) of the Plan has been undertaken<sup>13</sup>. I am satisfied that the results of the HRA Screening Report show that an Appropriate Assessment is not required. It can therefore be concluded that no significant effects upon the integrity of the European sites<sup>14</sup> within the Plan area or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a result of implementing the Plan.
- 2.6 Accordingly, procedural tests P1 and P2 have been satisfied and the relevant legal requirements complied with.

### 3 The Overall Plan Strategy

#### *The Spatial Strategy*

- 3.1 The LDP vision is derived from the National Park Management Plan<sup>15</sup> which, together with national planning policy guidance and the Wales Spatial Plan (WSP)<sup>16</sup>, provides an overarching framework for the LDP and its objectives. The LDP objectives seek to translate the National Park's purposes<sup>17</sup> and the duty imposed on the NPA<sup>18</sup> in their aim and focus. In summary, the LDP seeks to ensure that the Brecon Beacons will be a place where the wildlife, natural beauty, cultural heritage and special qualities of the National Park (NP) are protected and enhanced for future generations. Everyone who lives in, works in or visits the Park will experience a prosperous and vibrant area, while the impact on the local and global environment is reduced to acceptable levels.
- 3.2 The strategic objectives of the LDP seek to enable development in keeping with the environmental capacity of the NP. The concept of the environmental capacity approach is explained in the LDP. However, an explanation of how the LDP reflects the principles of sustainable development as proposed by the NPA (**MAC-2-3 to MAC-2-8**) would provide a greater degree of clarity and consistency with national planning policy<sup>19</sup>.

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<sup>12</sup> European Union Habitats Directive (92/43/EEC)

<sup>13</sup> Habitats Regulations Assessment of Deposit Local Development Plan: November 2010 & HRA Screening of Focussed Changes Report Annex: September 2011

<sup>14</sup> As defined in Planning Policy Wales (as updated November 2012) paragraph 2.4.6

<sup>15</sup> Brecon Beacons National Park Management Plan: Managing Change Together (2010 – 2015)

<sup>16</sup> 'People, Places, Futures' The Wales Spatial Plan 2008 Update

<sup>17</sup> To conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of its special qualities by the public. The Plan acknowledges the 'Sandford Principle' which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict.

<sup>18</sup> The Authority has a duty to seek to foster the economic and social wellbeing of local communities within the National Park.

<sup>19</sup> Planning Policy Wales paragraph 4.1.4 and Figure 4.1

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- 3.3 The vision and objectives of the LDP have determined the spatial strategy of the Plan. The population of the NP is geographically dispersed. Historically, settlements in the NP were largely self-contained but with increasing accessibility to private transport development became more disseminated. As facilities became more centrally provided, dependency upon the car as the main form of transport increased. It is recognised that this pattern of dispersed development is not sustainable and as such, the LDP seeks to concentrate development within those settlements with the greatest access to services, preferably within walking distance of the facilities that cater for the local population or within easy reach by public or private transport, and to limit development in the wider countryside<sup>20</sup>.
- 3.4 The spatial strategy sets out the appropriate scale and location of growth within the NP and has taken direction from the vision for central Wales in the WSP. The majority of the NP area is within the WSP central Wales region and the vision for this area is said to be of most relevance to the character of the NP and its communities<sup>21</sup>. This vision promotes high quality living and working in smaller-scale settlements set within a superb environment, providing dynamic models of rural sustainable development, moving all sectors to higher value-added activities.

#### *Distribution of Development*

- 3.5 In achieving this vision the WSP sets out a hub and cluster approach to spatial development. The Brecon Beacons cluster comprises Brecon as the Primary Key Settlement (Level 1) and Talgarth, Hay-on-Wye and Crickhowell as Key Settlements (Level 2) having an important strategic function in serving the surrounding communities. In addition to these settlements, the LDP identifies the Sennybridge and Defynnog Key Settlement comprising the two settlements of Sennybridge and Defynnog.
- 3.6 The Sennybridge and Defynnog Key Settlement is located in the Maescar Community Council area which has a population comparable with the other 3 Key Settlements. Sennybridge has a good level of services, facilities and employment opportunities as well as public transport links to Brecon which is less than 10 miles away. There are fewer local facilities in Defynnog but its proximity to Sennybridge and connectivity by road allows easy access between the settlements. There is also a bus service connecting Defynnog to Sennybridge and Brecon.

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<sup>20</sup> Scale and Location of Growth Issues Paper (September 2010)

<sup>21</sup> Scale and Location of Growth Issues Paper (September 2010)

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- 3.7 There is an identified need for market and affordable housing in the area as well as a need to ensure the future viability of these communities. Sennybridge is identified as having an important strategic role within the west of the NP, serving the wider community. Given its proximity to Sennybridge, any future development in Defynnog would help maintain the strategic importance of Sennybridge<sup>22</sup>. PPW says that local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated for new housing and employment provision<sup>23</sup>.
- 3.8 Sennybridge and Defynnog could thus be considered as having an important strategic function in serving the surrounding communities and acting as a 'hub' in line with the WSP vision for central Wales which says that "the hub and cluster approach seeks to encourage communities to work collaboratively, not competitively, to support their own needs and those of the smaller settlements and hinterlands which gravitate towards them, balancing the needs and aspirations of communities with appropriate plan-led growth and service provision".
- 3.9 Outside the Key Settlements are a number of smaller settlements and hamlets which comprise approximately 72% of the NP population<sup>24</sup>. A further 3 levels of the settlement hierarchy consist of Level 3 Settlements where the focus is on enabling housing, small scale employment opportunities or community facilities which would support the vitality and viability of the area. Level 4 'Limited Growth' Settlements are villages or hamlets where development would be limited to affordable housing to support the socio-economic viability of the community. Level 5 'Countryside' is where development would be limited to that which supports sustainable and vibrant rural communities in accordance with national planning policy. There are also 'Allocated Brownfield Sites.'
- 3.10 Crai and Pennorth are defined as Level 3 Settlements. According to the Settlement Assessment Matrix results, whilst there is a community desire for growth and the capacity to accommodate future development in these settlements, they are not considered to be sustainable locations for growth<sup>25</sup>. Community engagement highlighted a strong desire to support the future of the community by allowing some market housing and associated contribution towards affordable housing.

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<sup>22</sup> Additional Work as agreed at the Exploratory Meeting (August 2012)

<sup>23</sup> Planning Policy Wales paragraph 4.7.7

<sup>24</sup> NPA response to Inspector's Preliminary Note 1 (March 2012)

<sup>25</sup> Additional Work as agreed at the Exploratory Meeting (August 2012)

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- 3.11 Crai and Pennorth were previously classed as settlements in the Local Plan and the proposed housing numbers are low. The modest allocations would provide small scale development to enable a level of growth designed to support community vitality. This is consistent with PPW Technical Advice Note (TAN) 6: 'Planning for Sustainable Rural Communities' which recognises that the planning system has a key role to play in supporting the delivery of sustainable rural communities. Also, that new development can help to generate wealth to support local services, ensuring that communities are sustainable in the long term<sup>26</sup>.
- 3.12 The distribution proposed in the submitted LDP<sup>27</sup> was for approximately 38% of the housing provision to be in Brecon, 22% in Key Settlements and 35% in Level 3 Settlements. However, my preliminary findings identified fundamental deliverability issues regarding some of the sites allocated for housing which would affect the number of houses anticipated to be delivered<sup>28</sup> and their distribution in the settlement hierarchy. Consequently, the NPA propose changes to the Plan to allocate additional sites for housing (see Housing Provision section below).
- 3.13 Taking these changes into account, approximately 37% of the housing provision would be in the Level 1 and 2 Primary and Key Settlements (22% in Brecon and 15% in the Key Settlements) with 23% being located in Level 3 Settlements and the remainder comprising allocations and commitments outside these settlements as well as windfalls (**MAC-6-5**). The additional allocations and proposed changes would result in a reduction in percentage terms of the overall housing provision in Level 3 Settlements (from approximately 35% to 23%).
- 3.14 Whilst the level of provision outside the Level 1 and 2 Settlements would still be relatively high, the distribution of allocations would be broadly similar to that of the population<sup>29</sup>. The level of allocations proposed in Level 1 and 2 Settlements would ensure that a significant proportion of development would be in the towns in line with the strategy, whilst an appropriate level of development in the smaller settlements to support local growth would maintain the future sustainability of these communities.
- 3.15 The LDP enables communities in Level 4 Settlements to respond to local development needs and maintain their vitality and viability in line with WSP objectives. Affordable housing can be permitted within these settlements where there is an identified need (see

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<sup>26</sup> PPW TAN 6: 'Planning for Sustainable Rural Communities' paragraphs 2.1.1 and 2.2.1

<sup>27</sup> Source: NLP Housing Supply Assessment Appendix 1 (July 2012) - which uses JHLAS 1 April 2011

<sup>28</sup> Inspector's Preliminary Findings on Housing and Employment Land Provision (April 2013)

<sup>29</sup> Additional Work as agreed at the Exploratory Meeting (August 2012)

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Affordable Housing section below). This is consistent with TAN 6 which says that where development is intended to meet local needs a site may be acceptable even though it may not be accessible other than by the private car<sup>30</sup>.

#### *The Settlement Assessment Matrix*

- 3.16 A Sustainability Index was used to score each settlement according to its function and sustainability and to inform the settlement assessment process. Some representors have questioned the weighting of the Sustainability Index scores and consider them to be flawed. However, in recognition that the Sustainability Index score did not take into consideration the role and function of a place, it was not used to determine the future development of an area alone.
- 3.17 Other factors were taken into account such as the community defined need for growth to sustain settlements, the sustainability of the location to support development and the environmental capacity of the area to accommodate further growth. This information was used to inform the Settlement Assessment Matrix, which in turn defined settlements in accordance with the hierarchy. I am satisfied that the evidence shows that a logical assessment based on availability of local services and public transport provision was carried out, together with an assessment of the capacity of settlements to absorb more growth and the need to sustain local communities. This has influenced the proposed scale and distribution of development.

#### *Site Assessment Methodology*

- 3.18 The NPA developed a process of assessment where areas of possible expansion and infill were tested for development potential. This was referred to as the development boundary review. The methodology is set out in the Site Assessment Methodology (September 2010) paper. The process included assessing existing settlement boundaries using current Unitary Development Plan (UDP) proposals maps and on-site assessments of the potential for settlement expansion and/or infill. This process identified whether there were natural or other constraints to settlement expansion including the potential impact on its setting.
- 3.19 Sites identified during this phase of assessment are referred to as Development Boundary Review Sites and, together with candidate sites, were assessed in terms of effect on settlement character, the special qualities of the NP including landscape impact, general planning and other constraints such as flooding and sustainability in terms of proximity to services and facilities. Further stages of the assessment of potential allocations considered stakeholder and

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<sup>30</sup> PPW TAN 6: 'Planning for Sustainable Rural Communities' paragraph 2.2.3

community feedback and deliverability including accessibility, drainage and ecology. The final phase of assessment included conformity with the Preferred Spatial Strategy and incorporated SA/SEA appraisal.

- 3.20 The evidence shows that a logical and considered approach has been taken to the allocation of residential sites and to defining settlement boundaries. The methodology employed has been examined at settlement and site-specific level and I am generally satisfied that it has been applied consistently. Several factors have been taken into account including the purposes of the NP, the settlement character and its capacity to accommodate new housing growth, accessibility, environmental and other constraints, proximity to facilities and services and the need to sustain local communities. Additional housing and employment sites are proposed to be allocated and the NPA has considered the search sequence and criteria set out in PPW<sup>31</sup>. As explained below, the changes would support delivery of the strategy.
- 3.21 Changes to paragraph 3.16.3.3 as proposed in **MAC-3-1** would provide clarity that sites in zone C2 should not be allocated for highly vulnerable development in accordance with the advice set out in TAN 15: 'Flood Risk and Development.'

#### *Settlement Boundaries*

- 3.22 Settlement boundaries are defined for the Primary and Key Settlements (Policy S LP2) and shown on the Proposals Map. Within Level 4 'Limited Growth' Settlements the extent of the village nucleus is shown on the Proposals Map and defined as the "settlement extent." The defined settlement extent shows areas where development will be enabled to support community sustainability in accordance with Policy LGS LP2. A revision to the Proposals Map key to refer to "Limited Growth Settlement Extent (Level 4)" instead of "Limited Growth Settlement Boundary (Level 4)" as proposed (**MAC-PM-K**) would improve clarity and ensure that the Proposals Map is consistent with Policies LGS LP1 and LGS LP2.

#### *Relevant Plans, Policies and Strategies in Adjoining Areas*

- 3.23 There are 9 constituent Unitary Authorities (UAs) within the NP boundary. Some of the constituent UAs have adopted LDPs in place. Monmouthshire County Council (MCC) has submitted its LDP for examination. There are no strategic settlements in the NP proposed by MCC, although there are strategic sites proposed near Abergavenny at the edge of the NP. Carmarthenshire County Council has submitted its LDP for examination. The settlements in that part

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<sup>31</sup> Planning Policy Wales paragraphs 9.2.9 and 9.2.10

of the NP are not proposed as strategic settlements in Carmarthenshire's Deposit LDP. When the LDP was submitted for examination, Powys County Council (PCC) was at an early stage in preparing its Deposit LDP. The NPA also consulted with Herefordshire Council and all other Unitary Authorities within and adjoining the Brecon Beacons NP.

- 3.24 The NPA instigated a series of meetings with constituent UAs to discuss emerging strategies at a local level but these were cancelled largely due to the differences in timescales for each LDP. On-going dialogue has thus generally been on an ad-hoc basis. However, the NPA is a member of several regional forums where cross boundary issues are discussed. Whilst some representors emphasise that there has been a lack of meaningful engagement between the NPA and its constituent UAs, there is little to suggest that where cross boundary issues are relevant, the LDP is not compatible with the development plans or strategies prepared by neighbouring authorities.

### *Conclusion*

- 3.25 The spatial strategy and proposed distribution of growth is based on an appropriate assessment of the capacity of settlements to accommodate development, the availability of local services and facilities and the need to support the future sustainability of communities. It has also had regard to other relevant plans and strategies relating to the area and to adjoining areas. Subject to the changes proposed, the spatial strategy has a sound basis and is consistent with national planning policy and the WSP. It satisfies the consistency, coherence and effectiveness tests of soundness.

### Recommendation

- 3.26 That in order to make the Plan sound the following changes are required:

**MAC-2-3, MAC-2-4, MAC-2-5, MAC-2-6, MAC-2-7, MAC-2-8, MAC-3-1, MAC-6-5, MAC-PM-K**

- 3.27 The following minor changes are not required to make the Plan sound, though they would improve the Plan's clarity and precision:

MAC-2-1, MAC-2-2, MAC-4-3, MAC-4-4, MAC-4-5

## **4 Housing Provision**

### *The Level of Housing Growth*

- 4.1 The identified housing requirement in the NP is 1,990 dwellings between 2007 and 2022. This figure is consistent with the Welsh

Government's (WG) 2008-based population and household projections and formed the starting point for assessing the NP's housing requirement, in accordance with national planning policy<sup>32</sup>. In recognition of the statutory obligations which define the purposes and duty of the NPA, the Plan seeks to enable a level of development that is capable of being delivered without unacceptable impact on the NP's special qualities.

- 4.2 The NPA has analysed a range of housing, economic and demographic forecasts, trends and factors to provide the most reliable basis upon which to assess the LDP's future housing requirement<sup>33</sup>. The analysis of the different scenarios indicates that there is a potential housing demand during the Plan period of between approximately 900 dwellings under the zero-net migration scenario and 3,000 dwellings under the projected economic growth scenario.
- 4.3 In reaching a final housing requirement figure the assessment recognises that migration will continue to be an important factor which has a significant impact upon the demographic profile of the area. The evidence shows that whilst the levels of natural change associated with all of the scenarios are negative (i.e. the number of deaths exceeding the number of births) changes in household composition, household formation and occupancy rates will result in a requirement for additional houses. If residential development was restricted then the result would not necessarily be a reduction in net in-migration but an exacerbation of affordability problems as the demand/supply balance would increase house prices.
- 4.4 The requirement of 1,990 dwellings over the LDP period has been assessed as being deliverable in the context of the area's existing infrastructure capacity and environmental considerations in relation to its NP status. It would provide a balance between some growth to help reduce potential affordability issues and conserving the area's natural beauty, wildlife and cultural heritage in line with the NP's statutory purpose and duty. The LDP provision for housing has been tested and is supported by a robust evidence base and it is considered that this figure is in line with the projections. The Plan's proposed level of housing growth is thus soundly based.

#### *Five-year Supply of Land for Housing*

- 4.5 The Plan is a long-term strategy but it must also provide short-term delivery. It is important to focus on delivery in order to achieve the objectives of the LDP, particularly as it has less than 10 years left to run. PPW is clear that Local Planning Authorities must ensure that

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<sup>32</sup> Planning Policy Wales paragraph 9.2.2

<sup>33</sup> Assessment of Future Need for Housing: NLP (July 2012)

sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing. This means that sites must be free, or readily freed, from planning, physical or ownership constraints, and economically feasible for development<sup>34</sup>.

- 4.6 In the submitted Plan, Policy SP5 (as amended by AFC-6-9) identifies a supply of land to provide an estimated 1,996 dwellings over the Plan period. It became apparent during the hearing sessions of the examination that the situation had changed in relation to the anticipated housing supply since preparation of the deposit plan<sup>35</sup> and again since the later housing supply assessment had been undertaken<sup>36</sup>. Some sites which were proposed to be allocated for housing had subsequently been the subject of detailed or outline planning applications and/or had received planning permission which provided a more accurate or likely level of housing to be provided. More significantly, it became evident that there were considerable constraints or barriers to delivery of some housing sites which had not been anticipated.
- 4.7 Each of these factors had an effect on the housing supply figure, including the 5-year housing land supply, and in the absence of any consensus between participants, it became difficult to agree the basis and starting point for the examination. At my request, the NPA and Home Builders Federation (HBF) prepared a Statement of Common Ground (SoCG) to set out the key points of agreement regarding land supply from a base date of 1 April 2012. The SoCG considered the housing supply for the 5-year period 2012-2017 and for the balance of the Plan period to 2022. It was agreed that this would form the starting point for the examination of the Plan's housing supply.
- 4.8 The SoCG provided two alternative estimates of the likely 5-year housing land supply. The weight to be accorded to this evidence is less than a completed Joint Housing Land Availability Study (JHLAS), but it provides the NPA's own estimate of the sources of housing supply over the next 5 years. Using a rigid application of the PPW TAN 1: 'Joint Housing Land Availability Studies' methodology, the SoCG indicates that there would be a land supply of 5.3 years immediately upon adoption of the Plan<sup>37</sup>.
- 4.9 For JHLAS purposes, for sites to be genuinely available, they must be allocated in an adopted development plan or have a valid planning permission. These are baseline requirements but other

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<sup>34</sup> Planning Policy Wales paragraph 9.2.3.

<sup>35</sup> October 2011

<sup>36</sup> Housing Supply Assessment: NLP (July 2012)

<sup>37</sup> Housing Land Supply Statement of Common Ground (March 2013) and Inspector's Preliminary Findings on Housing and Employment Land Provision (April 2013)

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considerations in TAN 1<sup>38</sup> include how long sites have been in the 5-year land supply. Also, sites should have the necessary infrastructure available within the 5-year period and there should be a reasonable prospect of sites being sold for development where they are not already owned by developers.

- 4.10 As outlined in my Preliminary Findings, the 'JHLAS' exercise undertaken for the SoCG can only provide an insight. The NPA identifies land which it considers will meet housing requirements for the next 5 years. The SoCG identifies several sites where there is disagreement over whether they should form part of the 5-year supply and the number of dwellings likely to be delivered in the first 5 years following adoption of the Plan. In some cases, there is disagreement whether the sites can be delivered at all over the Plan period. In my view, not all the sites listed would be deliverable in 5 years, though the majority could be delivered over the Plan period.
- 4.11 Turning first to the 5-year land supply, as outlined in my Preliminary Findings, I consider that the Dan-y-Bryn and Lancaster Drive site, Gilwern (CS102) should remain in the 5-year land supply. There is some dispute about when an application is likely to be submitted, with the worst case scenario put forward by HBF that a decision would be made by April 2014. If this was the case and the developer was willing to contribute towards the necessary upgrade to the sewerage treatment works then it is feasible that development could commence by 2015. It is generally agreed that the build rate on a single site is between 30-40 dwellings pa (40 in a good market area). As such, if development started in 2015 and continued – even at the lower rate – then most of the 112 could be delivered within 5 years.
- 4.12 If a developer does not contribute to the sewerage upgrade then Dwr Cymru Welsh Water (DCWW) says that the necessary improvements would need to be the subject of an Asset Management Plan submission for the period 2015-20. According to HBF's evidence this could add a couple more years to the anticipated timescale. Also, that once the site gets underway it is anticipated that there will be a slow build rate. There is little substantive evidence why there would be a slow build rate, particularly if the necessary infrastructure is put in place. I am thus satisfied that there is a reasonable prospect of this site (112 units) being developed within 5 years following adoption of the Plan.
- 4.13 For the reasons given<sup>39</sup>, the site above the Televillage in Crickhowell (DBR-CR-A) should not fall within the 5-year land supply. Given the site's topography and taking into account the views of infrastructure providers, the Highways Authority and the landowner in relation to

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<sup>38</sup> PPW TAN 1: 'Joint Housing Land Availability Studies' paragraph 7.3.3 – 7.4.1

<sup>39</sup> Inspector's Preliminary Findings on Housing and Employment Land Provision (April 2013)

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highways and drainage issues, and in the absence of evidence to the contrary, I place little reliance on the site delivering 40 dwellings and consider that 20 units would be a more realistic prospect in the longer-term.

- 4.14 Site CS137 in Hay Road, Talgarth has been allocated for mixed-use for over 5 years and is in two separate ownerships surrounded by industrial uses and the nearby cattle market. As my Preliminary Findings states, in the absence of any firm evidence that the landowners intend to bring this site forward for development, the length of time that it has been available and its constraints, I do not consider it likely to deliver 23 dwellings over the Plan period. TAN 6<sup>40</sup> says that planning authorities should “ensure that any sites identified for development are effectively available and likely to be brought forward for development by the owner.” Also, “Sites that have not been developed between the development plan adoption and review dates should be reassessed.”
- 4.15 As a result of evidence provided during the examination, the NPA amended the boundary of site CS136 in Hay-on-Wye to preclude the two dental practices in operation on this site. Evidence from the Highways Authority is that access to site CS136 or DBR-HOW-K would only be possible if both surgeries vacated. There is no evidence that they will do so and in the opinion of the Highways Authority a satisfactory access from the side of the dental surgeries to serve the sites could not be achieved. From my own site inspection, I am not persuaded that an acceptable access to either of these sites could be achieved as indicated on the NPA's revised Plan. The sites are unlikely to come forward for development during the LDP period.
- 4.16 Included in the 5-year land supply 'commitments' category is the former E-Mag Factory site in Brynmawr (COM-BRM-A). Outline planning permission has been granted for 94 units but there is significant doubt whether the development will be delivered as the site lies within the proposed route of the dualling of the A465. As referred to in my Preliminary Findings, it is unlikely that the scheme would be developed until the position with the site is formally established. As such, the site cannot be guaranteed to be available for housing in the next 5 years, or indeed over the Plan period.
- 4.17 Taking the above considerations into account and working from the SoCG, my Preliminary Findings provides an estimate of the 5-year land supply (which includes a contribution of 110 units from small sites, explained below). This translates to a 5.1 year land supply if site COM-BRM-A is included or 4.6 years without it. My Preliminary Findings concluded that if a minimum 5-year supply of housing was

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<sup>40</sup> PPW TAN 6: 'Planning for Sustainable Rural Communities' paragraph 2.2.4

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to be achieved without relying on delivery of this site, additional land for approximately 100 dwellings would need to be allocated which would be deliverable within the first 5 years on adoption of the Plan.

- 4.18 In response to my Preliminary Findings, the NPA propose changes to the sites allocated in the submitted Plan, including allocating additional land for housing which is capable of being delivered within the first 5 years. These proposed changes are discussed in more detail below, but the NPA's estimated trajectory of the housing land supply is 5.9 years (**MAC-A-1a**). The weight which may be accorded to this evidence is limited as the housing supply estimates have not been tested through a JHLAS process. However, it provides a useful indication of the sources of supply within that period and will assist subsequent monitoring. The proposed changes are thus considered necessary if a minimum 5-year land supply is to be assured in line with PPW.

#### *Housing Land Supply for Rest of LDP Period*

- 4.19 My Preliminary Findings paper refers to the number of units likely to be delivered on the site north of Camden Crescent, Brecon (DBR-BR-A). This site is anticipated to be delivered beyond the first 5 years, during the rest of the LDP period. In response to concerns raised by the Highways Authority regarding topographical constraints, supporting information submitted by the promoter included a suggested road layout which would achieve an appropriate gradient.
- 4.20 As a consequence, the number of dwellings would be reduced from the 58 anticipated in the submitted Plan to 38. Whilst achieving the required gradient for the road layout would need to be addressed through the design of the scheme, current indications are that this site could be delivered. For these reasons, and as set out in my Preliminary Findings, I consider that a figure of 38 units is more likely to be achieved.
- 4.21 At the final Hearing, I was informed that this site is now the subject of an application for Village Green status. This is being challenged by the landowner and is the subject of separate legislation. The outcome is unlikely to be confirmed for some time and it would not be appropriate to exclude it from the Plan at this stage. The site is anticipated to be delivered during the rest of LDP period and the Monitoring Framework would enable regular monitoring of the rate of delivery. It would also indicate when sites were not delivering dwellings as anticipated which would trigger a review of the Plan.

#### *Contribution from Small Sites*

- 4.22 The NPA allowance for unallocated small sites coming forward is based upon a past completion rate (2001-2011) of 43 dwellings per

annum (pa). As explained in my Preliminary Findings, if the latest available JHLAS<sup>41</sup> is used to inform the small sites allowance this would equate to a total annual allowance of approximately 22 pa, almost half of that anticipated. The 43 pa estimated is based on an average of relatively erratic delivery rates since 2005 ranging from 17 to 171 pa. Furthermore, the average rate of completions of small sites has been much lower than 43 pa in the early years of the Plan period (since 2007 the average has been 23 pa).

- 4.23 This figure thus anticipates a significant uplift, but the number of small site completions since 2000 are generally declining year on year and there is nothing to suggest that this will significantly reverse. Whilst the economy and market conditions may improve, it would not necessarily be soon enough to make a material difference to the number of windfalls coming forward, considering that less than 10 years remain of the Plan period. For the reasons given, I consider that a more realistic estimate from this source is 220 dwellings from 2012 and for the remainder of the Plan period<sup>42</sup>, as put forward by HBF in the SoCG and based on the latest JHLAS and past completion data.

#### *Contribution from Windfalls and School Sites*

- 4.24 In the SoCG, the NPA has made an allowance for 150 dwellings within the LDP housing supply for windfall sites (though not within the 5-year land supply). As outlined in my Preliminary Findings, the anticipated windfall figure is consistent with evidence submitted to date which says that the 150 figure derives from the past windfall completion rate of 15 per annum (pa) from 2001 to 2011. In respect of delivery via large sites, provision of housing from this source has declined (in 2010-2011 there was only one dwelling completed on a large windfall site). However, the LDP is anticipating 15 pa based on a pro-rata figure of 92 over 2001-2007. Windfall completions over the last 4 years (2007-2011) also average 15 pa. I am thus satisfied that the anticipated delivery rate from windfall sites is achievable.
- 4.25 The NPA propose to include an additional windfall allowance from former school sites that they consider Powys County Council is likely to bring forward for residential development. An estimated 107 dwellings are anticipated to be delivered on school sites that have already closed or are due to close in the NP. There is no guarantee that all of the anticipated schools will close, that they will come forward for housing or that the number of houses anticipated will be delivered. Nonetheless, as stated in my Preliminary Findings, based on the available evidence and to allow greater flexibility over the longer term, an allowance can be made for windfalls from this source.

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<sup>41</sup> JHLAS 2011 (published June 2012)

<sup>42</sup> Housing Land Supply SoCG considers housing supply for the 5 year period 2012-17 and for the balance of the plan period to 2022

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However, 35 units have been deducted from the total of 107 proposed in light of information that indicates the delivery of a new school in Hay-on-Wye is likely to be delayed<sup>43</sup>.

- 4.26 As explained in my Preliminary Findings, the NPA’s proposed land supply, as set out in the SoCG<sup>44</sup>, would rely on over 30% of the housing provision to be met via non-allocated sites i.e. windfalls and small sites. Such a high reliance on the development of unidentified sites in a NP where the availability of land for housing is more strictly controlled would not provide certainty in the housing land supply. There would also be less control in respect of the geographical distribution of housing which could perpetuate more development outside of the Primary and Key Settlements. This could have implications for achieving the Plan’s objectives in terms of sustainable development and for delivering the spatial strategy.

*The Proposed Changes and the Implications for Housing Delivery*

- 4.27 As set out in my Preliminary Findings and explained above, the table below provides the NPA’s estimated land supply and my own estimate:

	<b>BBNPA</b>	<b>Inspector</b>
Completions	251	251
Under construction	66	66
Allocations	802	715
Commitments	420	326 (not including site COM-BRM-A)
Small sites	430	220
Windfalls	150	150
School sites	107	72
<b>TOTAL</b>	<b>2,226</b>	<b>1,800</b>

- 4.28 Based on my assessment, there is a potential shortfall of approximately 190 dwellings which would have implications for the ability of the Plan to deliver sufficient housing to meet the identified requirement of 1,990 dwellings. Furthermore, my Preliminary Findings identified that there is insufficient housing proposed in the Key Settlements (Level 2) to support delivery of the LDP’s spatial strategy, in particular in Crickhowell, Hay-on-Wye and Talgarth.

<sup>43</sup> Powys County Council Cabinet Report on Hay-on-Wye Developer Proposal (19 March 2013)

<sup>44</sup> SoCG LDP Land Supply table which shows that out of a total of 2226 units, 430 units would come from small sites, 150 units from windfalls and 107 units from school sites

- 4.29 The evidence shows that there is an increasingly aged population in Crickhowell. The Plan recognises that there is a high need for affordable, intermediate and accessible dwellings to meet the needs of retaining younger people and providing future accommodation for the older generation. Providing a range of homes in terms of size, tenure, accessibility and affordability is a priority for Crickhowell as is the need to support the vitality and viability of its retail centre.
- 4.30 The Hay Assessment<sup>45</sup> says that Hay-on-Wye is the second most sustainable location for development in the NP. It provides most services required for the town to be self-sufficient as well as the ability to serve as a key service-centre for smaller outlying settlements. Identified issues for the LDP to address include ensuring that future development maintains and strengthens the important strategic role Hay-on-Wye has. House prices and second/holiday home ownership is high. The Plan seeks to ensure that a range of house types and tenure options are provided.
- 4.31 Talgarth ranks as the third largest settlement and is one of the most sustainable locations for growth in terms of it being able to provide for a good range of day-to-day needs of its residents within the town itself<sup>46</sup>. Yet it has seen remarkable decline and experiences a higher level of deprivation than the rest of the Powys area in the NP. The Plan seeks to actively enable development that contributes to community vitality and to focus on providing innovative approaches to employment provision.
- 4.32 In the Sustainability Index, Sennybridge scored lower as a sustainable location than the other Key Settlements. The area's limited ability to accommodate development is also a factor in its original designation as a Level 4A Settlement. As outlined above, Sennybridge and Defynnog were reclassified together to form a Key Settlement (Level 2) in light of their important strategic function in serving the surrounding western communities and acting as a 'hub' in line with the WSP. Given its location, functionality, intended role and the proposed level of development within this Key Settlement, I did not identify it as such a high priority for identifying additional land for housing in my Preliminary Findings.
- 4.33 In response to these findings, the NPA proposes to allocate additional sites for housing, employment and mixed-use development. The Plan would provide for 2,045 dwellings over the Plan period. The proposed allocations are described in more detail below, but include additional sites for housing in or near to the Key Settlements of Crickhowell, Hay-on-Wye and Talgarth. In addition, sites CS136,

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<sup>45</sup> Part One Report 'Hay Assessment' (May 2009)

<sup>46</sup> Key Settlement Issues Paper: Talgarth (September 2009)

CS137 and DBR-HOW-K are not proposed to be allocated in light of my concerns regarding deliverability. Changes are also put forward to reduce the number of dwellings anticipated to be delivered on some of the proposed allocations in line with my findings and as outlined above.

- 4.34 The changes are shown in **MAC-6-4** and **MAC-6-5** together with corresponding changes to tables in the Appendix in **MAC-A-1**, **MAC-A-2** and **MAC-A-3** and to the Proposals Map and Inset Maps shown in **MAC-PM-1**, **MAC-PM-2**, **MAC-PM-3**, **MAC-PM-4**, **MAC-PM-5**, **MAC-PM-6**, **MAC-PM-7**, **MAC-PM-8**, **MAC-PM-9**, **MAC-PM-11**, **MAC-PM-12**, **MAC-PM-13**, **MAC-PM-14**, **MAC-PM-15**, **MAC-PM-16**, **MAC-PM-19** and **MAC-PM-20**.
- 4.35 Allocating additional sites as proposed would reduce such a high reliance upon windfalls coming forward (from over 30% of the total housing provision to approximately 21%). This would reduce reliance on this uncertain source of supply and provide more certainty that the housing requirement would be met. Moreover, there would be more flexibility and choice in terms of sites which would aid delivery and more control over the housing distribution throughout the NP.
- 4.36 There would also be more sites allocated for housing development in the Key Settlements in line with LDP objectives and the spatial strategy. As set out in my Preliminary Findings, the LDP relies predominantly on contributions from market housing to provide affordable housing, so additional allocations in the Key Settlements would also increase the provision of affordable housing (see below).

#### *Housing Distribution, Delivery and Site Allocations*

- 4.37 A number of representors have proposed alternative sites to those allocated in the Plan, most notably for housing development. There are likely to be a number of ways that the Authority can meet the needs of its community, each of which may be valid. Some may consider that the allocations in the Plan do not present the best solution, but my remit is only to recommend changes where required to make the Plan sound. The NPA has selected additional sites it proposes to allocate as well as other changes to address the shortfall identified (**MAC-6-2**, **MAC-6-3**, **MAC-6-4** and **MAC-6-5**)<sup>47</sup>. These changes are recommended together with the necessary consequential changes to the Proposals Map and Appendices arising as a result.
- 4.38 Some representors contend that other sites are equally, if not more suitable than the ones selected. However, provided that the additional sites are sound it would not be necessary or appropriate to impose replacements which the NPA does not support. Furthermore,

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<sup>47</sup> Inspector's Preliminary Findings on Housing and Employment Land Provision (April 2013)

in light of my conclusions regarding supply and demand it is not necessary to allocate more land for housing. My conclusions have thus determined how far I have needed to consider in detail other sites for allocation.

- 4.39 It is not the purpose of a development plan examination to consider detailed matters that are capable of being resolved through good design or the provision of infrastructure that can be provided without threatening viability and delivery. Appendix 2 of the Plan identifies specific development constraints and matters to be taken into account for each site allocated (as updated in **MAC-A-4**). Consideration of site-specific matters in the following paragraphs is therefore limited to those issues which relate to delivery or raise other significant issues of soundness.

a) *The Primary Key Settlement (Level 1)*

- 4.40 Proportionately more housing is proposed within Brecon, the Primary Key Settlement, consistent with its size and importance within the NP and its identification as a Primary Key Settlement in the WSP. Given the concentration of facilities, services and employment the apportionment of corresponding housing growth is appropriate.

*Site Opposite High School, Brecon (CS132)*

- 4.41 This mixed-use site forms the largest allocation in the Plan, and is anticipated to provide 137 dwellings. Of these, 30 are anticipated to be delivered within 5 years of adoption of the LDP with the rest expected to be delivered over the rest of the Plan period. Part of the site (0.5 ha) would be allocated for employment. Current indications are that this site could be developed as planned. Delivery of housing on mixed-use sites would be monitored.

*Site North of Camden Crescent, Brecon (DBR-BR-A)*

- 4.42 As referred to above, it is anticipated that 38 dwellings could be delivered on this site over the LDP period subject to the design of an appropriate road layout and pending the outcome of the application for Village Green status.

*Site North of Cradoc Close, Brecon (DBR-BR-B)*

- 4.43 It is anticipated that 33 dwellings will be delivered on this site. In response to concerns raised by the Highways Authority and others regarding land ownership, it was confirmed during the Hearings that Powys County Council, the landowners of this site are also the owners of the adjacent plot of land. As such, the Highways Authority is satisfied that there is adequate road frontage from which to gain access. Whilst there are suggestions that part of the site is used for

informal recreation purposes, there is little to suggest that the loss of this space would pose an insurmountable barrier to development.

- 4.44 DCWW has said that improvements to the Brecon waste water treatment works (WWTW) will need to be made prior to development of these sites (although 30 could be accommodated on site CS132<sup>48</sup>). However, excluding these 30 dwellings, development is expected beyond the first 5 years following adoption of the Plan. This would allow time for the improvements to be made, though developers could contribute towards the necessary upgrade.
- 4.45 Designation as a NP does not preclude new development and I have neither seen nor read anything to suggest that these sites or other sites allocated in Brecon could not be developed in a manner sympathetic to the area's status and in accordance with the NP's statutory purposes. Considerations such as impacts on landscape, archaeology and scheduled monuments are detailed matters which could be addressed at the planning application stage.

*b) Key Settlements (Level 2)*

- 4.46 The LDP recognises the strategic role that Level 2 Key Settlements fulfil in serving both their resident population and surrounding settlements, providing links to larger service areas outside of the NP boundary, in line with the WSP. Whilst the Key Settlements are identified as being the most sustainable settlements outside Brecon, there are significant constraints upon the levels of new development they can accommodate. The main constraints identified relate to the extent of areas at risk of flooding. There are also topographical constraints, particularly in Crickhowell and Hay-on-Wye.

*Land adjacent to Llangenny Lane, Crickhowell (CS141 and SALT 061)*

- 4.47 The site is one of the additional sites proposed to be allocated and it is expected that it would provide 20 dwellings within the first 5 years following adoption of the Plan. The Highways Authority raises no objections and current indications are that the site can be delivered. It would represent a logical extension to the town and considerations such as the visual impact on landscape and the setting of the town and boundary treatment could be addressed at the detailed application stage through sensitive design which responds to the historic character of the settlement.

*Land opposite The Meadows, Hay-on-Wye (DBR-HOW-A)*

- 4.48 This site forms part of a larger parcel of land and was proposed to provide 20 dwellings in the submitted Plan. In order to address the

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<sup>48</sup> Housing Land Supply Statement of Common Ground (March 2013)



identified housing shortfall in the Key Settlements, the NPA propose to allocate the whole of the site to provide approximately 62 dwellings. It is anticipated that these dwellings would be delivered within the first 5 years following adoption of the Plan.

- 4.49 The number of dwellings initially anticipated to be delivered by the NPA (MACs version 4) was 78, based on delivering approximately 30 dwellings per hectare (dph) in line with Policy 41 'Dwelling Density.' However, the promoter's Transport Assessment (TA) was based upon an anticipated 62 dwellings. The 62 figure also took account of matters such as landscaping, provision of open space and an easement to the culvert. The NPA has reduced the anticipated number of dwellings to be delivered on this site to 62 based on the evidence, though the actual number of units would be subject to detailed design considerations which would be more appropriately addressed and considered at the planning application stage.
- 4.50 It is proposed that access to the site would be provided directly off Gypsy Castle Lane. The TA<sup>49</sup> considered the existing traffic on Gypsy Castle Lane. It also analysed the capacity of the proposed site access with the projected additional traffic generated by 62 dwellings as well as future traffic growth. Automated Traffic Count (ATC) surveys, positioned on the western and eastern approaches of Gypsy Castle Lane, were undertaken for a period of 7 days. The level of traffic that could be generated by the development was calculated using the 'Trip Rate Information Computer System' (TRICS) database.
- 4.51 The assessment showed that the site could generate a maximum of 36 two-way vehicle movements during the busiest afternoon (PM) peak period. The surveyed peak hour traffic flows were used to undertake capacity analysis for the proposed site access junction in order to assess a worst case scenario projected from 2013 to 2023. The results showed that the proposed junction would operate within capacity with minimal queuing and delays both during the AM and PM peak periods for the future year 2023.
- 4.52 The statement submitted by the Highways Authority<sup>50</sup> raised objections that the location of the ATC surveys did not register traffic from 3 existing residential estates east of the site travelling in an easterly direction along Gypsy Castle Lane towards the town centre. Also, the TA anticipates that 80% of all vehicle trips from the site will be added to Gypsy Castle Lane movements towards the town centre but no reference is made to the presence of on-street parking which narrows the 6 m single lane carriageway to 4 m or less whereupon it is bounded by a solid stone wall with no overhang or rubbing strip to provide a buffer.

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<sup>49</sup> TPA Technical Note in respect of Gypsy Castle Lane, Hay-on-Wye (January 2013)

<sup>50</sup> Hearing Session 14 Additional Statement by Alison Brown, Powys County Council

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- 4.53 In response, the promoter provided clarification regarding projected traffic movements associated with the proposed allocation for 62 houses<sup>51</sup>. The TRICS data results from the TA indicate that a total two-way trip generation of 34 vehicles at weekday AM peak hour and 36 vehicles at weekday PM peak hour would be anticipated from a residential development of 62 dwellings. This would equate to approximately one vehicle every 2 minutes based on peak hour distribution. No technical evidence has been submitted by the Highways Authority to contradict these findings.
- 4.54 The predicted 80 -20% directional split in the TA was confirmed to be a robust assessment in terms of development related trips heading east towards the town centre. However, these assessments make no allowance for reductions. A reduction for affordable housing could be applied as it is associated with lower trip rates than market housing. It is also estimated that the implementation of a travel plan could reduce trips generated by approximately 5 – 15%.
- 4.55 Traffic calming measures in the form of priority build outs are in place in the vicinity of the site along Gypsy Castle Lane. It is acknowledged that on-street parking is prevalent but this is on the wider sections of road and at the narrowed section towards the Church, two cars can still pass. The operation of the route from the proposed site junction towards the town centre has been observed at peak periods and is said to operate efficiently with significant spare capacity. Given the technically uncontested evidence of the existing low levels of traffic on Gypsy Castle Lane and the low levels of trips anticipated to be generated by the proposed allocation, the indications are that the existing highway network could accommodate the additional traffic without a detrimental impact upon highway safety.
- 4.56 However, TPA confirm that an independent Road Safety Audit would be provided as part of any future planning application which would form the basis of any appropriate and necessary improvements to the local highway/pedestrian/cycle network. Any specific matters related to junction design, site layout, implementation of a travel plan, traffic management measures during the annual Hay Festival or highway works to mitigate any impact on the wider transport network would be more appropriately considered as part of any future planning application.
- 4.57 The site is in a sustainable location with pedestrian footways provided to the east along Gypsy Castle Lane and the Meadows. It is accessible via public transport with bus stops located along Brecon Road to the south of the site. Pedestrians and cyclists could access the site from Gypsy Castle Lane and the TA says that secondary

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<sup>51</sup> Letter to Inspector from TPA (October 2013)

pedestrian and cycle access points could be provided via the existing public footpaths at the western and eastern boundaries of the site. The surveys indicate that vehicular speeds and volumes of traffic are low which would promote cycling.

- 4.58 DCWW considers that there would be no insurmountable water, waste water or sewerage constraints to development and current indications are that the site can be delivered.

*Land adjoining Brecon Pharmaceuticals, Hay-on-Wye (SALT 059)*

- 4.59 The site is one of the additional sites proposed to be allocated and it is expected that it would provide 5 dwellings within the first 5 years following adoption of the Plan. There are no technical highways objections to the allocation of the site and current indications are that the site could be delivered.

*Extension to site T9, Talgarth (SALT 037, 048 and 055)*

- 4.60 This site is proposed for mixed-use development and it is anticipated that it would provide 15 dwellings within the first 5 years following adoption of the Plan. It is one of the additional sites proposed to be allocated and would comprise housing and approximately 1.56 ha for the development of a new primary school. DCWW says that improvements to Talgarth WWTW would be required and these works are currently scheduled to be completed by 31<sup>st</sup> March 2015. There are no objections to the allocation from the Highways Authority and detailed design considerations could be addressed at the planning application stage. Current indications are that the site could be delivered.

*Land at Castle Farm, Sennybridge (SALT 002 and 092)*

- 4.61 The site was proposed to be allocated for housing in the submitted LDP. By the time of the Hearings, it was confirmed that outline planning permission for residential development had been granted for this site. As I explained at the Hearing, development could therefore go ahead irrespective of the proposed allocation. The number of dwellings was not specified under the outline application. A figure of 42 units for this site was included in the SoCG<sup>52</sup> as a commitment in the Plan, based on a delivery rate of 30 dph in line with Policy 41 'Dwelling Density'. The actual number of units delivered would be subject to detailed design considerations which would be more appropriately considered as part of the reserved matters application which has now been submitted to the NPA.

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<sup>52</sup> Housing Land Supply Statement of Common Ground (March 2013)

c) Level 3 Settlements

- 4.62 Level 3 Settlements have been identified as being capable of accommodating appropriately-scaled development with the focus on enabling residential development, small scale employment opportunities and community facilities which would support the area. Due to physical and environmental constraints in the Key Settlements, a higher proportion of development has been cascaded down to the next settlement tier than might be expected. However, this is generally consistent with the prevailing dispersed settlement pattern, and the settlements have been identified as sustainable locations that have the capacity to accommodate future growth. Whilst the detailed settlement assessment did not identify Crai and Pennorth as sustainable locations for growth, as outlined above, the proposed allocations would provide small scale development to enable a level of growth designed to support community vitality.
- 4.63 As stated, the proposed changes would result in a reduction in percentage terms of the overall housing provision in Level 3 Settlements (from approximately 35% to 22%). I am satisfied that the evidence shows that a logical assessment based on availability of local services and public transport provision was carried out, together with an assessment of the environmental capacity of settlements to absorb more growth. This has influenced the proposed scale and distribution of development. Growth within each settlement tier will be monitored annually to ensure that no settlement exceeds its expected growth and that the distribution of new housing accords with the strategy.

*Land at Maesmawr Farm, Talybont-on-Usk (CS127)*

- 4.64 The site is proposed to be allocated for 57 dwellings. These are anticipated to be delivered beyond the first 5 years following adoption of the Plan. DCWW has advised that the Talybont-on-Usk WWTW has limited capacity and only 20 new dwellings could be accommodated, though developers could contribute towards the necessary sewerage improvements. Current indications are that the site could be delivered. Considerations such as impact on landscape and archaeology, improvements to the junction and contamination could all be addressed at the detailed application stage.

*Land at Ty Clyd, Govilon (CS39/69/70/88/89/99)*

- 4.65 It is proposed to deliver 93 dwellings on this site which are anticipated to be delivered beyond the first 5 years following adoption of the Plan. DCWW says that the Aberbaiden WWTW is hydraulically overloaded and improvements are necessary to accommodate the planned growth identified in the Plan. DCWW advises that costs associated with the upgrade would be high, though developers could

contribute towards the necessary works. The Highways Authority says that access to the site could be obtained. Detailed matters such as highways improvements/extensions of traffic calming measures could be considered at the planning application stage. Current indications are that the site could be delivered.

d) Level 4 Limited Growth Settlements

4.66 In Level 4 Settlements, future development will be permitted for affordable housing or where there is evidence to support that it is for some other genuine need in the locality in accordance with national planning policy. In line with the strategy, there are no sites proposed to be allocated in Level 4 Settlements. The 4% contribution to the housing supply anticipated in these settlements would comprise of dwellings that are either completed, committed or under construction.

e) Allocated Brownfield Sites

4.67 The anticipated contribution to the housing supply from outside the settlements is approximately 10% of the total, of which 8% will be provided on two large previously developed sites. The number of dwellings proposed to be allocated in open countryside has thus risen as a result of the allocation of these additional sites. However, it is still a small contribution towards the overall provision. This is in line with PPW which says that in rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole<sup>53</sup>.

4.68 The two previously developed sites proposed to be allocated are the former Army Camp at Cwrt-y-Gollen (CyG), Glangrwyney and the former Mid Wales Hospital (MWH), Talgarth. They will be allocated for mixed-use development, including residential and employment use. Whilst these sites are in open countryside, they are near to Key Settlements. The nearest settlement to the CyG site is the Level 4 settlement of Glangrwyney which is identified as being a sustainable location for growth<sup>54</sup>. It is also located approximately 2 km east of Crickhowell town centre. The WSP cites Crickhowell as an example of a settlement being very closely linked with adjoining settlements to the south. The MWH site is located outside the Talgarth settlement boundary but within approximately 1 km of the town centre.

4.69 PPW promotes preference for re-use of previously developed land and buildings, wherever possible avoiding development on greenfield sites. It says that many previously developed sites in built up areas

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<sup>53</sup> Planning Policy Wales paragraph 4.7.7

<sup>54</sup> Detailed Settlement Assessment Matrix Results in the Additional Work agreed at the Exploratory Meeting (August 2012)

may be considered suitable for development because their re-use will promote sustainability objectives. This includes sites in and around existing settlements where there is vacant or under-used land, commercial property or housing. PPW also recognises that in most rural areas the opportunities for reducing car use and increasing the use of public transport, walking and cycling are more limited. It also makes allowance for sites for employment in rural locations to be developed at the edge of settlements<sup>55</sup>.

- 4.70 Taking into consideration the statutory purposes of the NP, it is understandable that general market housing opportunities are more limited, particularly given the dispersed nature of settlements and the environmental constraints identified, specifically in the Key Settlements. It is thus reasonable to take account of previously-developed sites outside the Key Settlements in order to avoid allocating additional greenfield sites. The sites were allocated for development in the approved UDP<sup>56</sup>. Furthermore, in the absence of positive proposals to address the scale and complexity of redevelopment of these sites, they are likely to decline further which would exacerbate the detrimental visual impact on the surrounding area and special qualities of the NP.
- 4.71 PPW says that if the re-use of previously developed sites is to be achieved local authorities and other stakeholders will need to be more proactive. Local authorities should work with landowners to ensure that suitable sites are brought forward and to secure a coherent approach to renewal<sup>57</sup>. The Plan requires development briefs to be produced for mixed-use sites in Primary and Key Settlements. However, these sites are outside the settlements. It would be appropriate to require development briefs to ensure the cohesive development of these large-scale previously developed sites in the context of a NP. Proposed changes to Policy SP12 'Economic Wellbeing' and supporting text (**MAC-7-1 and MAC-7-11**) would clarify that development briefs would be required.
- 4.72 These additional allocations in open countryside are considered necessary in light of the identified need for market and affordable housing and employment development (explained in the Economic Wellbeing section below) and having regard to LDP objectives in respect of fostering sustainable communities as well as the wider planning policy objectives of minimising land-take and avoiding greenfield development.

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<sup>55</sup> Planning Policy Wales paragraph 4.4.3, 4.9.2, 7.3.2 and 9.2.9

<sup>56</sup> The Unitary Development Plan was approved for development control purposes but not formally adopted

<sup>57</sup> Planning Policy Wales paragraph 4.9.3

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*Cwrt-y-Gollen Former Army Camp, Glangrwyney (CS66 and SALT 050)*

- 4.73 The mixed-use site is anticipated to provide 70 dwellings which would be delivered in the first 5 years following adoption of the Plan. The site is also allocated for employment use (1.4 ha), community facilities and open space. The WSP recognises that the Central Wales Area has significant overlaps with other areas. Crickhowell is cited as being very closely linked with adjoining settlements to the south. The site is well located in relation to Abergavenny (approximately 4 miles) which is identified as a Primary Key Settlement in the WSP and there is a bus route linking the site to Abergavenny, Brecon and Crickhowell.
- 4.74 Subject to appropriate turning arrangements into the site from the A40 trunk road and the development layout meeting the appropriate adoptable highway standards, there is no objection to the allocation of this site by the Highways Authority. Part of the site is at risk from flooding, though no development is planned on this part of the site and there is no objection from Natural Resources Wales (NRW) in terms of flooding.
- 4.75 DCWW says that water supply and sewerage issues could be addressed. The Crickhowell WWTW may require upgrading which would need to be addressed either by DCWW or by contributions from the developer. These and other considerations such as internal road layout, impact on landscape and protected trees, contamination, archaeology and ecology would be more appropriately considered at the planning application stage. Current indications are that this site could be delivered. An outline planning application for development of this site has been submitted to the NPA.

*Former Mid Wales Hospital, Talgarth (CS111, SALT 032, 036, 047 and 062)*

- 4.76 The mixed-use site is anticipated to provide 93 dwellings, 3,500 sq m of employment and/or medical use as well as community use over the Plan period. The LDP seeks to support proposals that contribute to the wider regeneration of Talgarth. The site is not in an isolated rural area. It is within walking and cycling distance (approximately 1 km) of the town centre which has a good range of services and facilities and there are regular bus services to Hereford and other town centres. The site promoter's TA<sup>58</sup> showed that the site is a 10 to 15 minute walk from the town centre and this is in line with my own assessment.
- 4.77 The TA acknowledged that local topography may deter some people from cycling to/from the site, as some parts of the route exceed a 5% gradient. However, overall the average gradient is less than 5%

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<sup>58</sup> Former Hospital Site, Transport Assessment (February 2012)

and there would be scope to promote cycling between the site and the town. The TA formed part of a previous refused planning application for a higher number of dwellings than that anticipated to be delivered in the Plan and other proposals including a care home. It concluded that redevelopment of the site would generate fewer trips and have less of an impact on the local road network than the former hospital use. Also, that it would not have a materially adverse impact on the efficiency or safety of the highway network.

- 4.78 The Highways Authority says that any redevelopment would be considered positively if the traffic flows generated do not exceed those of the former use of the site. It considers that the scale of development being proposed by the allocation of the site for 93 dwellings and employment use would offer a reduction in traffic generated to the previous planning application and raises no objection. I have considered representations that a lower figure of 57 units, based on maintaining the majority of the original buildings, would be more appropriate. However, there are no structural surveys or robust evidence before me as to how that figure was derived and whether such a scheme would be viable.
- 4.79 The NPA is satisfied that up to 93 could be accommodated on the site. Based on the evidence before me I see no physical constraints to delivery of this number and consider 93 dwellings to be an appropriate indicative number to include in the Plan. However, the actual number of units delivered would be subject to detailed design considerations which would be more appropriately addressed and considered at the planning application stage.
- 4.80 DCWW says that water supply and sewerage issues would need to be addressed. Improvements to Talgarth WWTW would be required and these are scheduled for completion by 31<sup>st</sup> March 2015. These and other considerations such as site layout, impact on landscape, contamination and ecology would be more appropriately considered at the planning application stage. Current indications are that the site could be delivered.

### *Flexibility*

- 4.81 Many factors can affect the development of land. Ideally, there should be some flexibility to provide for unforeseen circumstances and to deal with the failure of sites listed in the LDP to come forward. Soundness test CE4 requires LDPs to be reasonably flexible to enable them to deal with changing circumstances. Although addressing policies aimed at the phasing of development, PPW<sup>59</sup> requires LDPs to be flexible, particularly where the development of unidentified (windfall) sites may fall short of the assumptions in the Plan.

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<sup>59</sup> PPW paragraph 2.5.2



- 4.82 Planning for more than the minimum number of houses required provides a safeguard should these windfalls not come forward at the rate expected and would ensure that the Plan is reasonably flexible. A contingency would also provide a safeguard against unforeseen problems affecting the delivery of allocated sites. It has generally been accepted that a 10% contingency would usually provide the required level of flexibility but more or less may be acceptable depending on the circumstances of each case.
- 4.83 Reductions in the anticipated number of dwellings that can be delivered on some allocated sites and a reduction of the proposed contribution from small windfall sites, as outlined above, would erode the flexibility allowance of 10.5%<sup>60</sup>. However, this flexibility allowance has been subject to change throughout the examination and in Hearing sessions the NPA acknowledged that it came out of the process rather than being planned and justified.
- 4.84 The proposed changes would result in a flexibility allowance of approximately 3% (shown in **MAC-A-1a**). Whilst this is less than the 10% usually considered necessary to provide the required level of flexibility, the possibility that the sites in the Plan may not deliver as anticipated has to be balanced against the impact of allocating additional land in the sensitive landscape of the NP.
- 4.85 The additional allocations would reduce the reliance on development coming forward via windfalls. The Plan has no phasing policy which means that the allocated sites can come forward at any time. The NPA has also reduced the number of dwellings anticipated to come forward on some sites to a more realistic level, in line with my Preliminary Findings.
- 4.86 There will be sufficient land allocated to ensure the delivery of 1,990 homes within the Plan period, a 5 year supply of housing land and some flexibility to ensure that if there is slippage the housing industry will have the potential to deliver sufficient homes to meet the identified requirement. The NPA has shown that the additional allocations can be delivered and there is greater confidence, in my view, that the Plan can provide the number of houses required.
- 4.87 The Monitoring Framework would enable regular monitoring of the rate of small sites and windfalls coming forward. It would also indicate when sites were not coming forward and delivering dwellings as anticipated which would trigger a review of the Plan. I am thus satisfied that the adopted LDP would be sufficiently flexible.

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<sup>60</sup> Housing Land Supply Statement of Common Ground (March 2013)

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### *Conclusion*

- 4.88 Subject to the changes referred to, the Plan makes satisfactory provision for the delivery of housing in a manner consistent with the development strategy and appropriate to the environmental capacity of the NP. The Plan is thus sound in respect of its general housing provisions and I conclude that the Plan is sound without inclusion of any of the other alternative sites suggested by representors. Consequently there is no need for me to consider these sites further.

### **Recommendation**

- 4.89 That in order to make the Plan sound the following changes are required:

**MAC-6-2, MAC-6-3, MAC-6-4, MAC-6-5, MAC-7-1, MAC-7-11, MAC-A-1a, MAC-A-1, MAC-A-2, MAC-A-3, MAC-A-4, MAC-PM-1, MAC-PM-2, MAC-PM-3, MAC-PM-4, MAC-PM-5, MAC-PM-6, MAC-PM-7, MAC-PM-8, MAC-PM-9, MAC-PM-11, MAC-PM-12, MAC-PM-13, MAC-PM-14, MAC-PM-15, MAC-PM-16, MAC-PM-19, MAC-PM-20**

## **5 Affordable Housing Provision**

### *Affordable Housing Need*

- 5.1 The shortage of affordable housing available to rent or buy is a main area of concern for communities in the NP. Difficulties in accessing the housing market are exacerbated by the significant percentage of second and holiday home ownership. The LDP recognises that the NPA is responsible for developing, implementing and monitoring policies to enable the provision of affordable housing in the NP. However, the NPA is not a Housing Authority and is reliant upon data provided by 9 constituent UAs. Each of these has different sources of evidence with varying methodologies and base dates covering areas which may or may not take into account the NP boundary. This is also the case for the Local Housing Market Assessments (LHMA)<sup>61</sup>.
- 5.2 With the exception of the Powys LHMA, there are no figures indicating the affordable housing need within the NP area of any of the UAs. As such, the NP analysed the most reliable data for each of the other unitary areas and measured it against alternative methodologies. It worked with the Rural Housing Enablers and constituent UAs to agree the housing need for the Plan period. Subsequent to this, and in response to representations received on the deposit LDP, the affordable housing need figure was amended as set out in the

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<sup>61</sup> Affordable Housing Issues Paper (November 2010)

evidence base<sup>62</sup>. The resulting identified need for affordable housing in the NP over the Plan period is for 1,248 dwellings. There are no serious challenges to this figure and the NPA's approach to assessing affordable housing need is considered to be sufficiently robust.

- 5.3 PPW advises that new development should incorporate a reasonable mix and balance of house types and sizes and it is important that authorities have an appreciation of the demand for different types of housing (i.e. intermediate and social rented) in relation to supply so that they are well informed in negotiating the required appropriate mix of dwellings<sup>63</sup>. Proposed changes (**MAC-6-8**) to the affordable housing section of the Plan would provide additional clarity that the mix and tenure of schemes to be provided would be commensurate with the needs identified in the area. It would also confirm that tenure-neutral schemes would be promoted to facilitate flexibility between tenures of owner occupation and renting.

#### *Provision of Affordable Housing*

- 5.4 The provision of additional affordable dwellings as part of an increased housing requirement would be a tangible benefit that would contribute to meeting the high identified need for affordable dwellings. Policy SP6 'Affordable Housing' and the supporting text have been amended to reflect that the LDP will provide for 475 affordable dwellings (**MAC-6-9 and MAC-6-10**). This is a significant increase from the 269 affordable houses anticipated to be delivered in the submitted Plan.
- 5.5 The provision of affordable housing to meet identified needs is a key objective of national policy. The NPA has considered ways in which the Plan might realistically increase affordable housing delivery, given the shortfall in the number of affordable housing units expected to be delivered compared to the level of need identified. The NPA recognises that opportunities to provide affordable housing need to be maximised.
- 5.6 National planning policy guidance<sup>64</sup> says that the authority-wide affordable housing target should take account of the anticipated levels of finance available, including public subsidy, and the level of developer contribution that can realistically be sought. Housing sites in the NP are generally small and the contribution of affordable homes has to come from a greater number of smaller sites. This, together with the environmental and topographical constraints to development, will have an impact on the capacity to deliver and the level of developer contribution that can be attained. The viability of

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<sup>62</sup> Affordable Housing Issues Paper Addendum 2: Updated Calculation of Affordable Housing Need (April 2011)

<sup>63</sup> Planning Policy Wales paragraph 9.2.15

<sup>64</sup> PPW TAN 2: 'Planning and Affordable Housing' paragraph 9.1

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developing potential sites and the anticipated future level of financial assistance in building new affordable homes has also been taken into account.

- 5.7 It is anticipated that 230 affordable homes will be provided from allocated sites and the remainder provided from non-allocated sites. Proposed changes to Policy SP6, Policy 13 'Affordable Housing Contributions' and the supporting text would clarify that affordable housing contributions would be required on the two mixed-use sites proposed to be allocated outside the Key Settlements (**MAC-6-7**, **MAC-6-10**, **MAC-6-11** and **MAC-3-13**).
- 5.8 A significant proportion of the anticipated affordable housing would still be provided via windfalls as a result of the proposed changes. However, as outlined above there is less of a reliance on this uncertain source of supply and the proportion of affordable homes anticipated via allocated sites would rise substantially. Furthermore, the evidence shows that windfalls are being delivered, particularly in the Brecon, Rural Hinterland, Abergavenny, Hay and Crickhowell sub-market areas<sup>65</sup>.
- 5.9 Under the submitted LDP policies, the actual amount of affordable housing provision sought would be 30% in the Abergavenny, Hay and Crickhowell sub-market, 20% in the Brecon, Carmarthenshire and Rural Hinterland sub-market and 10% in the Heads of Valleys and Rural South sub-market as set out in Policy 13. In seeking to meet the identified affordable housing need, the Plan relies heavily on such contributions. The evidence suggests that allocating sites specifically for delivery of 100% affordable housing would not be viable when the availability of Social Housing Grant (SHG) is so constrained<sup>66</sup>.
- 5.10 The Development Appraisal Toolkit (DAT) was used to evaluate Residual Values (RVs) for comparison with Existing Use Values (EUUV) of land as a basis for determining the viability of the affordable housing contribution targets to be included in Policy 13. The Affordable Housing Viability Study (AHVS)<sup>67</sup> concludes that developer contributions would deliver affordable housing in those market areas where 30% and 20% targets are proposed whilst still achieving positive residual land values. The AHVS update<sup>68</sup> shows that RVs have fallen only marginally in the higher value areas (between 1% and 3% dependent on scenario). In the middle market locations, RVs have fallen by between 5% and 11%.

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<sup>65</sup> NPA Small Site Analysis - Housing (February 2013)

<sup>66</sup> Affordable Housing Issues Paper Addendum 1: Deliverability of 100% Affordable Housing Sites and Dr Golland Viability Study Final Report (August 2010)

<sup>67</sup> Dr Golland Affordable Housing Viability Study Final Report (August 2010)

<sup>68</sup> Dr Golland Affordable Housing Viability Study Update (November 2012)

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- 5.11 At the top end of the market RVs still hold up well with a 30% affordable housing contribution, providing significant land owner returns (in the highest value areas residual value is in excess of £1.5 m per ha even despite minor falls in house prices). In the middle market RVs are over £500,000 per ha with either a 20% or 30% affordable housing contribution. In most cases this would be well above EUV. The overall conclusion is that on the basis of the updated RVs, the policy positions should be held.
- 5.12 However, whilst the AHVS recommends a 10% target in the Heads of Valleys and Rural South sub-market, it recognises that in those areas without 100% SHG, RVs are negative, even with no affordable housing contribution. The AHVS update says that in the lowest sub-market RVs have fallen the most and that the impact has compounded an already negative residual value. Also that “the most difficult policy target is arguably the current 10% affordable housing which applies at the lower end. On the face of the figures, this will be delivered only where sites realise house prices significantly above the average for the sub-market”.
- 5.13 The study update says that there will be areas where prices are significantly higher than the average and where contributions towards affordable housing would be viable. However, there is no evidence to substantiate this. Indeed the study's calculations suggest that, if affordable housing is proposed to be delivered without subsidy, RVs would be negative in the Heads of Valleys and Rural South sub-market at all development densities. The evidence thus suggests that residential development in the Heads of Valleys and Rural South sub-market would not be viable if it included any affordable housing element. Proposed changes to Policy 13 (**MAC-6-13**) to remove the 10% affordable housing requirement from these areas are thus necessary to satisfy the coherence and effectiveness tests of soundness. Very few affordable dwellings and only a small affordable housing contribution was anticipated to be delivered in this sub-market<sup>69</sup>. The changes have been taken into account in calculating the Plan's overall affordable housing provision.
- 5.14 The AHVS includes sensitivity testing for the application of Code 4 Sustainable Homes sustainability requirements on the assumption that these may add costs of £5,000 per dwelling but would not increase sales values or rents. The same figures are used for sensitivity testing where other contributions under section 106 of the Town and Country Planning Act 1990 (S106) or Community Infrastructure Levy (CIL) contributions increased from the £5,000 per dwelling assumed elsewhere in the AHVS to £10,000 per dwelling. The results showed that the strongest and mid market locations could

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<sup>69</sup> Affordable Housing Issues Paper (November 2010)

bear the increased costs whilst still leaving sufficient RV incentive for the landowner to release land.

- 5.15 When the same sensitivity testing was run for the AHVS update, the results suggested that additional costs of £5,000 per dwelling for Code 4 Sustainable Homes requirements would reduce RVs by 13 % in both the strongest and mid market areas (assuming a 30% and 20% affordable housing contribution respectively). However, it was shown that in these sub-markets, RVs should be able to assimilate these increases without significant impact to viability.
- 5.16 The study also looked at the potential impact of additional costs associated with the provision of fire sprinklers and an update to Part L of the Building Regulations in Wales which were foreseen to come into force in 2013. Whilst these costs were unknown at the time of the examination, it was agreed at the Hearing that taken together, they were likely to add approximately £7,000 per unit (though of course costs would vary according to the type and size of the dwelling and the type of sprinkler system employed). The NPA carried out an additional sensitivity analysis using the same baseline and key results from the 2012 AHVS update to take into account these, and other potential additional costs<sup>70</sup>. The scenarios tested the proposed affordable housing policy targets, £10,000 per unit for S106/CIL contributions, £7,000 per unit for fire sprinklers/Part L requirements and £10,000 per unit for 'additional' costs. These scenarios were tested individually and cumulatively.
- 5.17 The analysis showed that when the proposed policy targets for affordable housing - together with the different scenarios referred to above - were tested, even for the 'worst case scenario' taking all these cumulative costs together, RVs were shown to be well above EUV and would still provide a healthy profit margin for the developer (based on 20% equivalent profit on gross development value) and a substantial return to the landowner.
- 5.18 In July 2013 a Ministerial statement "Stimulating Home Building in Wales" confirmed that proposed amendments to Part L of the Building Regulations would seek to achieve 8% reductions in greenhouse gas emissions as opposed to the 40% previously consulted on. Also, the requirement for fire sprinklers would only apply to high risk properties until 2016. The statement indicates that this would have a close to cost neutral effect on building costs. Whilst it is not known what the likely cost of achieving the 8% target reductions required would be, the WG consider that it is likely to be lower than the £7,000 per unit used for the sensitivity testing. This further supports the policy position for affordable housing proposed in the Plan. The

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<sup>70</sup> Dr Golland Viability Paper following Rearranged Housing Session (February 2013)

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NPA says that the statement demonstrates that such matters should be assessed at the planning application stage.

- 5.19 Construction costs incorporated in the DAT assessments are those published by the Building Cost Information Service (BCIS) of the RICS and stated to include a 15% on-cost for regular site works. Some representors have referred to additional costs that may affect the viability of affordable housing provision, some frequently encountered, such as off-site access or drainage works, and others to be regarded as abnormal, such as asbestos removal, contamination or remediation. Such extraordinary costs would need to be taken into account at an appropriate stage and factored into the viability assessment. However, they remain subject to variation from site to site. On the evidence in this case, these costs are therefore best taken into account in negotiation on specific development proposals with the policy target percentages as a starting point.
- 5.20 The degree to which uplift in RV over EUV represents viability and whether this would offer sufficient incentive to landowners to release land at a price developers are willing to pay was debated at the Hearings. There was very little by way of contradictory or comparable evidence to the residual land values used in the AHVS and no clear contradictory evidence in relation to anticipated development land prices. I agree with representations that for a scheme to be viable there must be a reasonable developer and landowner return. In practice, this 'return' and scheme viability is relative to individual circumstances. With the exception of the 10% target in the Valleys and Rural South sub-market, the range of affordable housing contributions tested represent realistic targets, accepting that in many cases site-specific negotiations would be necessary.
- 5.21 The NPA prepared a draft Supplementary Planning Guidance (SPG) on delivery of Policy 13 of the LDP. This was consulted on in parallel with the LDP in accordance with planning policy guidance<sup>71</sup>. SPG is not subject to examination, though it was discussed at the Hearings. It is anticipated that once it has complied with the accepted procedures for SPG, it would provide additional information and clarity to assist delivery of Policy 13. The target for its adoption is by the end of 2014 which is included in the Monitoring Framework.
- 5.22 Subject to the proposed changes, the evidence base provides a robust and coherent justification for the affordable housing targets in the LDP. These targets are indicative and the level of affordable housing required in each case will depend on detailed site-specific assessments. Furthermore, the monitoring provisions would provide

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<sup>71</sup> LDP Manual paragraph 7.3.5

the necessary flexibility to enable the Plan to respond to any significant change in local market conditions.

#### *Flexibility and Contingency*

- 5.23 Policy 14 'Enabling Affordable Housing Exception Sites' includes support for 100% affordable housing on sites immediately adjoining housing development boundaries as an exception to policy. The Plan recognises that exception sites coming forward will provide additional flexibility as they have not been counted towards the overall affordable housing target and this will be monitored. Proposed changes to the title of Policy 14 and to the wording of Policy SP6 (**MAC-6-10** and **MAC-6-14**) to refer to 'exception sites' would be in line with PPW<sup>72</sup>.
- 5.24 The proposed changes would increase the number of sites to be allocated for housing. Policy 13 as amended by **MAC-6-13** includes the flexibility to negotiate on a site-by-site basis and for a commuted sum payment where it can be demonstrated that on-site provision would be unviable. Monitoring would ensure that there is an even distribution of such housing within the settlements which accords with the strategy. These changes would improve the Plan's coherence and effectiveness, and overall the strategy is considered sufficiently flexible to deal with future changes.

#### *Local Needs Housing in Level 4*

- 5.25 Policy 15 'Local Needs Housing within Limited Growth Settlements' and Policy SP6 of the submitted LDP proposed to enable either affordable housing or local needs housing in Level 4 'Limited Growth' Settlements where it can be proven that there is not a need for affordable housing in the area. Little evidence was submitted to support the need for this type of housing and it would be unlikely that it could be demonstrated that there was not a need for affordable housing, given the identified requirement.
- 5.26 PPW refers to local housing needs for market housing<sup>73</sup>. However, it makes clear that this type of housing would normally have no occupancy condition. Also, that such a departure from national policies would need to be justified with robust evidence. Policy 15 of the submitted Plan would require development enabled through the policy to be tied by occupancy conditions or S106 Planning Obligations. It thus does not comply with PPW. Moreover, given the conflict with PPW, it would be unlikely that local needs housing could be considered to serve a useful planning purpose.

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<sup>72</sup> Planning Policy Wales paragraph 9.2.23

<sup>73</sup> Planning Policy Wales paragraph



5.27 Consequently, such a condition or obligation would be unlikely to meet the requirements of WG Circular 35/95 'The Use of Conditions in Planning Permissions' and WG Circular 13/97 'Planning Obligations' and the statutory tests set out in Regulation 122 of the CIL Regulations 2010 (as amended). In these circumstances, it could not be guaranteed that such housing would not be released onto the open market. Changes to Policy SP6 (and the supporting text) to delete reference to local needs housing and to require affordable housing in Level 4 Settlements and deletion of Policy 15 as proposed by **MAC-6-7**, **MAC-6-10** and **MAC-6-15** would ensure that the Plan is consistent with national planning policy.

### *Conclusions*

5.28 The NPA has sought to maximise opportunities to deliver affordable housing and to provide a greater degree of flexibility through proposed changes to the Plan. There is a realistic prospect that the anticipated number of affordable homes can be delivered and I consider that, subject to the changes referred to, the Plan is sound.

### **Recommendation**

5.29 That in order to make the Plan sound the following changes are required:

**MAC-6-7, MAC-6-8, MAC-6-9, MAC-6-10, MAC-6-11, MAC-6-13, MAC-6-14, MAC-6-15**

5.30 The following minor change is not required to make the Plan sound, though it would improve the Plan's clarity and precision:

MAC-6-12

## **6 Gypsy and Traveller Sites**

### *Level of Need*

6.1 The Gypsy and Traveller Accommodation Needs Assessment<sup>74</sup> identified a requirement for 14 additional residential pitches in Powys from 2007 – 2012 and a further 5 residential pitches from 2012 – 2017. The majority of the requirement is for a family currently occupying a site temporarily within the NP. The NPA has worked with Powys County Council and other stakeholders in a joint Working Group to assess Gypsy and Traveller accommodation needs and to find a suitable permanent site.

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<sup>74</sup> Gypsy & Traveller Accommodation Assessment – Shropshire, Herefordshire, Telford & Wrekin and Powys (2008)

### *Allocation and Provision*

- 6.2 In consultation with the family in need of permanent accommodation, a site was identified in the NP at land adjoining the settlement boundary of Brecon, adjacent to the Brecon Enterprise Park. Powys County Council was granted planning permission for development of the site as a permanent Gypsy and Traveller site accommodating 14 pitches in March 2012. A Compulsory Purchase Order (CPO) was made by Powys County Council under the provisions of Section 226(1)(a) of the Town and Country Planning Act 1990 and the Acquisition of Land Act 1981 to acquire the site which has been granted planning permission. The CPO has been confirmed.
- 6.3 The extent of the approved scheme would not encompass the entire site proposed to be allocated<sup>75</sup>. There would thus be space within the allocation to accommodate 14 pitches plus 5 further pitches if required. The allocation is shown clearly on the Proposals Map as a permanent Gypsy and Traveller site. As such, I do not consider it necessary to change the map to reflect the exact area of land which has planning permission or to amend the settlement boundary to include the site.
- 6.4 An assessment has been undertaken to determine whether there are likely to be any significant sustainability effects arising from the proposed allocation and I am satisfied that it would not affect the outcome of the SA<sup>76</sup>. Powys County Council says it is in receipt of provisional funding towards the cost of delivering the proposed site<sup>77</sup>. The identified need for a permanent Gypsy and Traveller site in the NP can be met.
- 6.5 Policy 16 'Sites for Gypsies and Travellers'<sup>78</sup> is criteria based and would enable sites to come forward should a need for additional permanent accommodation or transit sites be identified in future. Proposed changes to the policy wording (**MAC-6-17**) would make clear that any ancillary buildings required should be designed in appropriate local materials thereby improving the clarity of the policy. The situation would be subject to annual review and triggers in the Monitoring Framework (as proposed to be updated in **MAC-11-1**) would ensure that there is a proactive approach to identifying suitable sites if additional sites are needed.
- 6.6 The supporting text to Policy 16 (paragraph 6.5.5 as amended by AFC-6-17) says that "Gypsy and Traveller sites in the countryside are

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<sup>75</sup> FC 6-PA-30 and FC 6-PM-31

<sup>76</sup> Addendum to Sustainability Appraisal – Focussed Change Assessment: October 2011 & HRA Screening of Focussed Changes Report Annex: September 2011

<sup>77</sup> Proof of Evidence of David Pritchard on behalf of Powys County Council (January 2013)

<sup>78</sup> As amended by AFC-6-18

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not compatible with the NP's statutory purposes and due to their unsustainable location are unlikely to be able to gain access to a satisfactory level of services and facilities. The NPA will therefore support proposals which are located within, or as an exception to normal planning policies, adjacent to settlement boundaries."

- 6.7 WG Circular 30/2007<sup>79</sup> says that any statutory duties associated with a designation must be complied with. Also, that in deciding where to provide for Gypsy and Traveller sites, local planning authorities should first consider locations in or near existing settlements with access to local services. However, it also says that sites in rural settings, where not subject to specific planning or other constraints, are acceptable in principle. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local services.
- 6.8 Whilst national planning policy makes clear that National Parks must be afforded the highest status of protection from inappropriate development<sup>80</sup>, there is no definition of inappropriate development such as that provided in relation to Green Belts. As such, there is no established presumption against this type of development in a National Park. Consequently, to comply with the Circular, it is recommended that paragraph 6.4.6 be amended to delete part of the first sentence which refers to Gypsy and Traveller sites in the countryside not being compatible with the NP's statutory purposes (**MAC-6-16**).
- 6.9 Subject to the proposed changes to the Monitoring Framework and suggested amendment to paragraph 6.4.6 as outlined above, the Plan's approach to the provision of Gypsy and Traveller sites is sound.

### **Recommendation**

- 6.10 That in order to make the Plan sound the following changes are required:

**MAC-6-16, MAC-6-17, MAC-11-1**

## **7 Overarching Policies**

- 7.1 The overarching policies seek to put the NP purposes at the heart of everything that the LDP is seeking to achieve, and to promote addressing and limiting the effects of climate change as a key theme.

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<sup>79</sup> WG Circular 30/2007 'Planning for Gypsy & Traveller Caravan Sites'

<sup>80</sup> Planning Policy Wales paragraph 5.3.6

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### *Environmental Protection*

- 7.2 Proposed changes to paragraph 4.6.2 as put forward in **MAC-3-2** would improve clarity in terms of legislative requirements for HRA to be applied to all European sites. It would also provide flexibility should there be a revision of Special Areas of Conservation (SACs) or other European sites in the NP in future. This would accord with the guidance in TAN 5: 'Nature Conservation and Planning'.

### *Biodiversity*

- 7.3 Changes to Policy 51 'Sites of European Importance' as proposed by the NPA in **MAC-3-3** would make the policy much clearer as well as ensuring that it is consistent with national planning policy guidance in TAN 5. Similarly, proposed changes to Policy 52 'Sites of National Importance' (**MAC-3-5**) and to Policy 53 'Sites of Importance for Nature Conservation' (**MAC-3-6**) would ensure that they reflect national planning policy guidance.
- 7.4 The insertion of the words "Where protected species are present or likely to be present the NPA will..." as proposed in **MAC-3-8** in the supporting text to Policy 54 'Protected and Important Wild Species' would better reflect the requirements of TAN 5. The insertion of the word "SACs" at the end of the final sentence of paragraph 3.10.3 (**MAC-3-4**) would ensure that the tributaries of the rivers Wye and Usk are included in the supporting text of Policy 56 'Water Quality.'
- 7.5 A definition of ancient woodland is proposed to be inserted in paragraph 3.9.1 of the supporting text to Policy 55 'Ancient Woodland and Veteran Trees' (**MAC-3-10**). This would be consistent with the definition of the Ancient Woodland Inventory and would add clarity to the policy.

### *Conserving the Historic Environment*

- 7.6 Proposed changes to paragraph 3.15.1.4 (**MAC-3-11**) would introduce appropriate reference to PPW which sets out WG objectives to preserve or enhance the historic environment.
- 7.7 Paragraph 3.15.8.3 refers to development involving a site listed within the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. Changes proposed by the NPA to the supporting text of Policy 63 'Historic Landscapes' (**MAC-3-12**) would replace the words "Where necessary an EIA will be required" with "Where necessary an assessment of the significance of the impact of development on historic landscape areas will be required." This assessment is the process by which to assess the significance of development impacts on historic landscapes. It will not always form part of the EIA as there will be instances where an EIA is not

required. The proposed change would thus provide the necessary clarity to the text.

- 7.8 Proposed changes to criterion 1 of Policy 61 'Development Affecting Conservation Areas' (**MAC-3-14**) would ensure that the policy wording is consistent with PPW and the statutory test<sup>81</sup>.

#### *Climate Change and Sustainable Design*

- 7.9 The LDP seeks to ensure that all development in the NP is able to adapt to the likely effects of climate change. It acknowledges that in seeking to respond to this challenge, there would be significant implications on the way buildings are designed and constructed as well as to how they are heated and lit, and in respect of their location and orientation. PPW promotes good design as a way of achieving sustainable development and ensuring that development contributes to tackling the causes of climate change. It also advocates the use of Design and Access Statements to explain how the objectives of good design have been considered from the outset.
- 7.10 National planning policy sets out the minimum standards that developments will be expected to achieve. Whilst PPW and TAN 22: 'Planning for Sustainable Buildings' provide for local planning authorities to set local requirements that exceed the sustainable building standards, these should be on strategic sites identified in LDPs. Furthermore, in seeking standards higher than the national minimum, local planning authorities should ensure that what is proposed is evidence-based and viable<sup>82</sup>.
- 7.11 The wording of Policies 5, 9, SP11, S LP3 and LGS LP3 of the submitted Plan suggests that higher than national sustainable building standards would be required for all development in the NP. TAN 22 makes clear that local requirements for sustainable building standards should relate to a strategic site rather than set out area-wide policies unless there is sufficient justification. In addition, planning authorities should engage with developers, landowners and the community to identify opportunities for higher sustainable standards on strategic sites to ensure that what is proposed is evidence-based and viable.
- 7.12 In the absence of any robust evidence that would support higher than national standards for development in the NP, this approach cannot be justified. Furthermore, there is little evidence to show that any meaningful engagement has been undertaken with developers, landowners and the community to consider whether such local requirements would be viable and would not act as a barrier to

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<sup>81</sup> Planning (Listed Buildings and Conservation Areas) Act 1990

<sup>82</sup> Planning Policy Wales paragraph 4.12.5 and TAN 22: 'Planning for Sustainable Buildings' sections 7.1 and 7.2

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development, including the delivery of affordable housing. Proposed changes to the policies (**MAC-3-17 – MAC-3-23 inclusive, MAC-4-22 and MAC-4-23**) to seek national standards for sustainable design would be consistent with national planning policy.

- 7.13 PPW says that development that meets or exceeds the required sustainable design standards should be encouraged<sup>83</sup>. Changes proposed to Policy SP 4 'Climate Change' and the supporting text (**MAC-3-15 and MAC-3-16**) would introduce sufficient flexibility by clarifying that relevant development proposals should show how the likely effects of climate change have been considered and how the development would contribute to the aim of carbon neutrality in accompanying Design and Access Statements. The NPA also intends to produce revised SPG on sustainable design.
- 7.14 PPW says that local planning authorities should promote 'barrier free' housing developments, e.g. built to Lifetime Homes standards<sup>84</sup>. Policies B LP1 and K LP1 require housing development in Primary and Key Settlements to meet Lifetime Homes standards in response to the demographic evidence which shows that the NP has higher than the Wales average age profile, a high percentage of in-migration and predicted future in-migration of people of late working/retirement age<sup>85</sup>. This is particularly the case in the Primary and Key Settlements<sup>86</sup>. The evidence supports the requirement for Lifetime Homes standards to ensure that new housing will help meet the long-term needs of its occupants.
- 7.15 Proposed changes to the policies and supporting text (**MAC-4-7, MAC-4-8, MAC-4-9, MAC-4-20 and MAC-4-21**) would ensure that there was sufficient flexibility to deviate from this requirement where it was shown that meeting the standards would not be appropriate or it would impact negatively on project viability and thus jeopardise delivery. The changes would also clarify that such evidence or supporting information could be included in the Design and Access Statement.

### *Sustainable Use of Water*

- 7.16 The current arrangement for licensing abstraction for drinking water is said to be reaching a critical point across much of the NP area<sup>87</sup>. However, as explained above, Policy 5 'Sustainable Use of Water' in the submitted Plan required higher than national sustainable

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<sup>83</sup> Planning Policy Wales paragraph 4.12.6

<sup>84</sup> Planning Policy Wales paragraph 9.1.2

<sup>85</sup> Assessment of Future Need for Housing: NLP (July 2012)

<sup>86</sup> Brecon Assessment (June 2009), Crickhowell Assessment (May 2009), Key Settlement Issues Paper: Talgarth (September 2009), Part One Report 'Hay Assessment' (May 2009), Sennybridge & Defynnog Assessment: Part One Report (August 2012)

<sup>87</sup> Water Issues Paper (September 2010)

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standards for all development which had not been sufficiently justified and was not in accordance with PPW and TAN 22. Proposed changes to the policy and supporting text, as outlined above, would ensure that the Plan was consistent with national planning policy.

- 7.17 The LDP recognises that whilst NRW has a statutory role in relation to water quality, the planning system can limit the adverse effects of development on water quality. Policy 56 'Water Quality' concerns land use matters and seeks to prevent development that would have unacceptable impact on the water environment. It is realistic as regards its requirements and is clearly related to particular water quality issues within the Plan area. Additionally, the Monitoring Framework would include indicators to ensure that development would not adversely impact on water quality or quantity.
- 7.18 The Plan seeks to encourage the use of sustainable drainage systems (SUDS) within development where appropriate, to mitigate any changes to the natural surface water run-off and ground permeability caused by new development. TAN 15: 'Development and Flood Risk' advises that where there are concerns regarding surface water run-off from new development, planning authorities should consult the relevant competent authority on a case-by-case basis who will determine what, if any, attenuation is to be required.
- 7.19 SUDS should be implemented wherever they will be effective and planning authorities may consider imposing a condition requiring developers to examine the SUDS option. If it is demonstrated that SUDS would work on a site then the planning authority would require SUDS to be implemented<sup>88</sup>. Proposed changes to Policy 38 'Sustainable Drainage Systems' to clarify that proposals for new development would only be required to consider the incorporation of appropriate SUDS (**MAC-8-4**) rather than being required to incorporate SUDS in all new development proposals would ensure that it is consistent with national planning policy<sup>89</sup>.

### *Renewable Energy*

- 7.20 Policy SP9 'Renewable Energy' will enable the development of renewable energy schemes which are of a scale and technology appropriate to their location. Community-led renewable energy provision and small scale schemes such as those related to farm diversification would be enabled through this policy as would schemes which incorporate low and zero carbon technologies within their design. The NPA intend to produce SPG on such small scale schemes.

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<sup>88</sup> PPW TAN 15: 'Development and Flood Risk' paragraphs 8.1, 8.2 and 8.5

<sup>89</sup> PPW paragraph 12.4.3, TAN 15: 'Development and Flood Risk' and TAN 22: 'Planning for Sustainable Buildings' Section 7.

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### *Sustainable Use of Land*

- 7.21 The LDP requires all new development to make best possible use of available development land through Policy 18 'Sustainable Use of Land' which encourages appropriate redevelopment of buildings, the use of previously developed land and achieving minimum dwelling densities relevant to the settlement. Policy 41 'Dwelling Density' requires all residential development to be developed at a minimum density of 30 dph where this is compatible with the existing character of the area.
- 7.22 This aim reflects the sustainability objectives of PPW which seek to promote resource-efficient and climate change resilient settlement patterns that minimise land-take, especially through preference for previously-developed land and buildings, wherever possible avoiding development on greenfield sites<sup>90</sup>. Proposed changes to the supporting text (**MAC-8-13**) would ensure that the LDP is consistent with these objectives.

### **Recommendation**

- 7.23 That in order to make the Plan sound the following changes are required:

**MAC-3-2, MAC-3-3, MAC-3-4, MAC-3-5, MAC-3-6, MAC-3-8, MAC-3-10, MAC-3-11, MAC-3-12, MAC-3-14, MAC-3-15, MAC-3-16, MAC-3-17, MAC-3-18, MAC-3-19, MAC-3-20, MAC-3-21, MAC-3-22, MAC-3-23, MAC-4-7, MAC-4-8, MAC-4-9, MAC-4-20, MAC-4-21, MAC-4-22, MAC-4-23, MAC-8-4, MAC-8-13**

- 7.24 The following minor changes are not required to make the Plan sound, though they would improve the Plan's clarity and precision:

MAC-A-6

## **8 Economic Wellbeing**

### *Employment Growth*

- 8.1 The vision for the NP – as set out in the NPMP – includes healthy and socially inclusive communities and a sustainable, thriving economic, social and cultural life in accordance with the NPA's statutory duty. Employment has been a central issue related to community needs identified by both the NPMP and LDP consultation processes. The LDP acknowledges that the Plan can contribute to economic development by performing a role as an important catalyst for development, by

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<sup>90</sup> Planning Policy Wales paragraph 4.4.3



allocating sufficient and appropriate land for employment uses, to protect existing employment sites and premises and by setting out policies under which proposals for economic uses will be considered.

- 8.2 The NPA has considered alternative growth scenarios to provide the most reliable basis upon which future employment land requirements are planned.<sup>91</sup> An Employment Land Review (ELR) was undertaken to assess this requirement over the life of the LDP. The ELR anticipates that employment growth will decline, with the number of jobs expected to fall by 8.5% over the Plan period. Class B1 and B2 activities are expected to contract the most. However, the non-B Class sectors are only expected to decline by 0.2% whilst their contribution to local employment is expected to increase from 65% in 2007 to 71% in 2022. Non-B Class employment sectors such as tourism, retail, agriculture and the public sector are identified as being particularly important in employment and economic terms.

#### *Employment Land Provision*

- 8.3 The ELR identifies the Key Sector scenario as being the most appropriate basis for the identification of future employment land. It is based upon an analysis of the current local economic context as well as an assessment of potential future economic trends. Furthermore, it has been subject to sensitivity analysis to ensure that the LDP makes adequate provision for future employment land requirements.
- 8.4 The ELR identified that there is a need to make provision for a minimum of 1.5 ha of land for B Use Class for employment development for the remainder of the Plan period (2012 – 2022). It recommended that this provision should comprise 0.9 ha of B1 Use Class and 0.6 ha of B8 Use Class and should be in addition to that which has been developed over the first 5 years of the Plan. The allocations should comprise of sites which measure at least 0.5 ha reflecting the observed need for smaller, start-up units. They should be located within accessible, sustainable locations which are desirable to the market. Brecon and Hay-on-Wye were identified as particular property “hot-spots” where demand is greatest.
- 8.5 It is predicted that some employment growth will be in non-B Use Class sectors. There will also be ‘space less’ jobs growth, created in existing premises or via extensions to existing business premises and working from home which would have no impact upon the overall strategic employment land requirements. The ELR also acknowledges the contribution that could be made to the employment land and premises supply through changes of use and conversions. The

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<sup>91</sup> Assessment of Future Need for Housing: NLP (July 2012) and Employment Land Review: NLP (July 2012)

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potentially important role of windfall employment sites is also recognised.

- 8.6 A total of 2.06 ha of employment land were proposed to be allocated in the submitted Plan. However, during the course of the examination, it became apparent that 0.6 ha proposed to be allocated (DBR-HOW-E) at Hay-on-Wye could not be delivered due to the presence of a restrictive covenant on the land. As such, the total land proposed to be allocated for employment fell to 1.46 ha, thus below the minimum 1.5 ha recommended. Also, site SALT 016/058 at Sennybridge proposed for mixed-use was withdrawn during the examination resulting in a further loss of employment land.
- 8.7 In response to my concerns regarding this shortfall<sup>92</sup>, additional employment site allocations are proposed as part of mixed-use developments at the former Army Camp in Glangrwyney and the former Mid Wales Hospital site near Talgarth. A site is also proposed to be allocated for employment use at Hay Road in Talgarth. This would bring the total amount of employment land to be allocated over the Plan period to 3.3 ha. MAC-7-9, MAC-7-10, MAC-7-12 and MAC-7-13 set out the list of sites proposed to be allocated for employment and mixed-use in the NP.
- 8.8 Whilst the additional allocations would increase the provision of employment land to a level above the predicted requirement, the ELR says that 1.5 ha should be considered a minimum rather than a maximum need. Identifying more employment land would provide a choice of sites, particularly in or near Key Settlements where vacancy rates on existing industrial estates are low. This would also allow for some unanticipated opportunities to improve the local economy. Proposed changes to the provision of employment land (**MAC-7-8, MAC-7-9, MAC-7-10, MAC-7-12 and MAC-7-13**) are thus necessary to satisfy the coherence and effectiveness tests of soundness.
- 8.9 The ELR identified a high demand for employment land and premises in Hay-on-Wye. The importance of providing employment opportunities in the West of the NP and the strategic role of Sennybridge is also recognised. Given the withdrawal of employment sites from the Plan in these Key Settlements at a late stage in the examination, it is recommended that alternative employment land is identified at the earliest opportunity. Proposed changes to the monitoring framework (**MAC-11-1**) to identify alternative sites at these locations are recommended. The availability of employment land and the rate at which it is developed would also be monitored.

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<sup>92</sup> Inspector's Preliminary Findings on Housing and Employment Land Provision (April 2013)

### *Employment and Housing Alignment*

- 8.10 The LDP requirement of 1,990 dwellings over the LDP period is based on the WG household projections, which formed the starting point in line with PPW<sup>93</sup>. In assessing its housing requirement, the NPA identified a number of scenarios which reflect potential future population and household growth and predict a range of factors which could affect, and be affected by, that growth.
- 8.11 It is recognised in the evidence that the population and household forecasts on which the NPA relies do not seek a direct numerical correlation between employment land supply and dwelling requirement. It is predicted that there would be a loss of 1,430 people of working age population in the NP over the Plan period. Taking into account assumed levels of unemployment and out-commuting from the NP, the implication of this reduction would be that approximately 1,050 fewer jobs could be supported by the local population over the Plan period<sup>94</sup>.
- 8.12 However, such forecasting is difficult and cannot be guaranteed to be accurate. The proposed provision of 2,045 dwellings over the lifetime of the Plan is higher than the potential housing demand predicted under the Baseline scenario. As such, the housing requirement would provide for a level of employment growth that is greater than the baseline. Furthermore, it is above the level associated with natural change and would provide for a level of net in-migration in line with the WG's projections.
- 8.13 As outlined above, the Key Sector scenario is identified as being the most appropriate basis for the identification of future employment land. This scenario seeks to promote growth in the key economic sectors in the Brecon Beacons. It anticipates a growth of just 27 jobs over the LDP period. Nonetheless, it is more optimistic than the Baseline scenario which forecasts a decline in employment levels by 1,490 over the same timescale. By contrast, in order to achieve a numerical housing and jobs alignment, the Key Sector scenario would necessitate an increase in the economically active population through in-migration resulting in a housing requirement of over 3,000 dwellings. This would represent a significant increase over the WG household projections.
- 8.14 It does not follow that sufficient housing land is needed to support the theoretical maximum potential level of employment growth. That maximum may not be achieved and an excess supply of housing land would risk sites remaining undeveloped or lead to excessive levels of commuting. However, the Plan should maintain provision for a

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<sup>93</sup> Planning Policy Wales paragraph 9.2.2

<sup>94</sup> NPA Statement Hearing Session 4: Economic Wellbeing

supply of housing and employment land that would moderately exceed the forecast needs to provide some flexibility in the event that actual economic and population growth is stronger than forecast.

- 8.15 The evidence shows that the NP is likely to continue to experience an ageing population, driven by older people moving into the area and younger people leaving. Therefore seeking appropriate levels and forms of economic and housing growth would help to address the demographic imbalance by tackling housing affordability problems and helping to reduce the loss of younger people<sup>95</sup>. The NPA has recognised that more employment land should be identified than will necessarily be taken up in order to provide a choice of sites and to allow for unanticipated opportunities to improve the local economy.
- 8.16 The LDP would provide for housing and employment growth in the Primary and Key Settlements in line with the Plans' strategy and WSP. Whilst some mixed-use allocations are proposed on previously developed land outside the Key Settlements, PPW recognises that in rural locations new employment development will be required in many areas and should generally be located within or adjacent to defined settlement boundaries, preferably where public transport provision is established. It also promotes the re-use of suitable previously developed land including sites in and around existing settlements<sup>96</sup>.
- 8.17 The Plan would provide for an appropriate level of growth in the context of the NP's status and ensure that its key economic resource, the environment, is protected. I consider that the Plan sets out a sensible approach to the provision and location of housing in relation to employment. It is sufficiently flexible to deliver employment opportunities in line with anticipated needs whilst allocating sufficient employment land to accommodate the element of growth likely to need such sites. The Plan's approach is thus considered sound.

#### *Retaining Employment Facilities and Supporting Employment Development*

- 8.18 The LDP recognises that it is important to retain the existing stock of employment premises and to protect existing employment land for business purposes. Policy 18 'Protection of Employment Sites and Buildings' requires a site or premises to be marketed for a continuous period of at least 12 months before an alternative use would be considered. Proposed change **MAC-7-4** would add clarity to the policy by including that the 12 months marketing should take place immediately prior to the submission of an application.

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<sup>95</sup> Assessment of Future Need for Housing : NLP(July 2012) and Employment Land Review: NLP (July 2012)

<sup>96</sup> Planning Policy Wales paragraphs 7.3.2, 4.4.3, 4.7.2 and 4.9.2

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- 8.19 The ELR recommends that the LDP policies should adopt a positive and flexible approach with regards to allowing appropriate conversions and changes of use for B Use Class employment proposals and extensions or up-grading of existing business premises. It is recognised that many businesses would welcome the opportunity to expand their existing premises to accommodate growth rather than seek to purchase new premises. The NPA propose to create Policy 17 'Employment Generating Development' (**MAC-7-14**) which would improve the Plan's clarity and consistency of interpretation.
- 8.20 Under this new criteria-based policy, development for B Use Class employment, including live/work proposals, would be permitted on allocated sites, existing business parks and non-allocated land within or adjacent to settlement boundaries. Proposed changes to the supporting text to the policy to emphasise that small scale enterprises and businesses play a key role in maintaining a vibrant economy in rural areas and contribute to maintaining and enhancing community sustainability (**MAC-7-15**) would reflect national planning policy guidance<sup>97</sup>.
- 8.21 B Use Class employment development outside settlement boundaries and settlement extents is supported by the new policy proposed by the NPA entitled Policy 19 'Enabling B Use Class Employment Use outside Settlement boundaries and Settlement Extents' (**MAC-7-16**). Exceptionally, and subject to certain criteria, such development would be permitted on sites adjoining and forming a logical extension to appropriate settlements where an established business cannot expand on its existing site and there are no other suitable sites available within the settlement.
- 8.22 There is also support for conversion of existing redundant buildings for commercial use in the open countryside, subject to appropriate criteria. The flexibility of the policies would thus allow employment proposals to come forward on windfall or non-allocated sites across all areas of the NP.
- 8.23 In conclusion, the Plan provides adequate opportunity to meet the identified need for employment land and sufficient flexibility to support employment generating development proposals. None of the additional allocations proposed by others are required to make the Plan sound, nor are suggested changes for some employment sites to be changed to mixed-use. Subject to the recommended changes, it meets the coherence and effectiveness tests of soundness.

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<sup>97</sup> Planning Policy Wales paragraph 7.3.1

### *Retail and Town Centres*

- 8.24 The LDP spatial strategy sets out the vision for the retail function within the Primary and Key Settlements. The Plan recognises that supporting strong and vibrant retail centres is vital to ensure the future vitality of the historic market towns and their surrounding communities. The retail strategy is thus to safeguard existing retail uses and to maintain and enhance the diversity of uses in the retail centres, as set out in Policy SP13 'Retail Strategy'. The proposed change to the wording of this policy to refer to 'retail centres' rather than 'retail cores' (**MAC-7-6**) would improve the Plan's consistency.
- 8.25 The main retail centre in the NP is Brecon, followed closely by Hay-on-Wye, then Crickhowell and Talgarth respectively. Retail surveys and a review of all the planning applications determined since 2000 were undertaken. The results showed that Brecon, Hay-on-Wye and Crickhowell are vibrant market towns which operate at different scales but provide essential services to their local and surrounding areas<sup>98</sup>. Their importance as destination shopping centres is also acknowledged, given that they specialise in certain types of retail or service in order to attract visitors and in recognition of the importance of the tourist sector in the NP. In contrast, the retail centre in Talgarth has declined with shops closing.
- 8.26 The surveys concluded that there is no identifiable demand for additional retail space in the main retail centres. The retail strategy thus seeks to maintain the level of retail provision whilst allowing for appropriate growth that will increase the vitality and viability of each centre. For Talgarth, this will also mean supporting proposals that will regenerate the town as well as contribute to the wider regeneration of Talgarth.
- 8.27 The LDP recognises that variety and activity are the essential elements of the continued viability of the retail centres. The extent of the retail centres are identified in the Plan. The purpose of defining them is to ensure their continued vitality by protecting the existing retail uses. Policy 24 'Development in Retail Centres' seeks to prevent the loss of existing retail units and to encourage a diversity of uses which will attract visitors and shoppers.
- 8.28 The promoter of an out-of-centre site near Brecon says that their submitted assessment indicates that there could be surplus capacity of comparison and convenience expenditure in the Brecon catchment area over the period to 2025. I have little evidence to support these assertions as the assessment was not supported by a household catchment survey. Moreover, it did not include the necessary consideration of the effect of such development on the established

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<sup>98</sup> Retail Issues Paper (September 2010)

centre in Brecon, as required by PPW. The NPA's evidence shows that there is a good range of comparison stores within the town and an acceptable level of convenience store provision. The number of A1 (Retail Use Class) units decreased between 2005 and 2007<sup>99</sup> and the vacancy rate within the retail centre is approximately 9%.

- 8.29 I do not consider that the need for further convenience and comparison shopping in Brecon has been conclusively demonstrated. Moreover, the site is not well-related to the town centre and retail development here would not follow the sequential approach for the selection of sites<sup>100</sup>. National policy would allow for the consideration of planning applications for retail development outside the defined centres. This would be subject to evidence as to the quantitative or qualitative need including any negative effects on existing centres and the application of the sequential test. However, the need for additional retail allocations and the lack of a sequentially preferable site in the town or at the edge of the centre has not been proven<sup>101</sup>. An additional or alternative convenience store allocation at an out-of-centre location is thus not considered appropriate.
- 8.30 The extent of the proposed Hay-on-Wye retail centre is wider than that identified in the UDP. It has been extended to encompass areas where there is an existing retail use. The retail survey shows that there has been a decrease in the percentage of A1 shops and no identifiable demand to necessitate the allocation of additional retail sites. However, there is a low vacancy rate. Extending the retail centre boundary as proposed would help to maintain the level of retail provision available in the town and allow for appropriate growth thereby enhancing its vitality, attractiveness and viability in accordance with the objectives of PPW<sup>102</sup>.
- 8.31 In response to discussions at the hearings, the NPA propose to change the retail centre boundary to include properties in retail use in Oxford Road and Backfold and to exclude Belmont Road which is predominantly residential (**MAC-PM-10**). Subject to these changes, the boundary extent would better reflect the true extent and character of the retail centre.
- 8.32 The boundary of the retail centre in Talgarth reflects the dispersed pattern of retail units in the town. Whilst many of the units in Bell Street are vacant, the retail survey shows that the vacancy rate decreased from 2005 – 2009. Bell Street contains the majority of the town's retail floorspace and shop frontage and if units were lost here, opportunities to further develop the town's retail centre would be

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<sup>99</sup> Retail Issues Paper (September 2010)

<sup>100</sup> Planning Policy Wales Paragraph 10.2.11

<sup>101</sup> Planning Policy Wales Paragraph 10.2.10

<sup>102</sup> Planning Policy Wales paragraphs 10.1.1 and 10.1.2

limited. Policy 24 permits the change of use to other uses, including residential, if it can be demonstrated that there is no longer a need for a retail use. Furthermore, the town's vacancy levels and the performance of Policy 24 will be monitored. If necessary, the boundary of the retail centre could be reviewed at a later date.

- 8.33 Whilst Sennybridge and Defynnog are identified together as a Key Settlement, the Sennybridge centre comprises only a small number of shops. As such, a retail survey was not undertaken. Policy 26 'Neighbourhood, Village and Rural Shops' relates to village shops in Level 3 and Level 4 Settlements. Proposed changes to include reference to the Key Settlement of Sennybridge and Defynnog (**MAC-7-2**) would make clear that the policy was applicable to village shops in this settlement. In addition, corresponding changes to the supporting text (**MAC-7-3**) would improve the Plan's coherence.
- 8.34 In conclusion, the LDP's retail policy supports the vitality and viability of retail centres and ensures that goods and services are concentrated in sustainable locations in line with the WSP and the Plan's overall spatial strategy. As such the approach is sound.

#### *Sustainable Tourism*

- 8.35 The LDP identifies that tourism is one of the foremost means of fostering the social and economic wellbeing of local communities and seeks to support sustainable tourism whilst ensuring that the environment, which forms the basis of the tourism industry in the NP, is protected. It is recognised that there are several areas where LDP policies can support sustainable tourism such as through encouraging the reuse of historical buildings, promoting high design values and landscape protection and through the protection of historic buildings of conservation importance. Furthermore, the LDP will continue to encourage the use of sustainable forms of transport as recommended in the ELR. Policy 27 'New Buildings for Holiday Accommodation' permits new buildings within defined settlements in line with the spatial strategy.
- 8.36 There is no clear evidence to demonstrate that allocating land in Llangattock – a Level 4 Settlement - for holiday accommodation is needed in order to make the Plan sound. Furthermore, part of the site lies within an area at risk of flooding (Zone C2 as defined by the TAN 15 Development Advice MAP<sup>103</sup>) and a Flood Consequences Assessment (FCA) has not been carried out<sup>104</sup>. Consequently, such an allocation would not comply with national planning policy guidance<sup>105</sup> and meet the soundness test of consistency.

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<sup>103</sup> PPW TAN 15: 'Development and Flood Risk'

<sup>104</sup> As required by TAN 15: 'Development and Flood Risk' paragraph 6.2

<sup>105</sup> PPW TAN 15: 'Development and Flood Risk' paragraph 10.8

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## *Agriculture and Forestry*

- 8.37 The ELR recommends that agriculture and forestry activities should be promoted as key economic sectors and should encourage farm diversification. This is reflected in the LDP which recognises that farm diversification offers key benefits for the socio-economic growth of rural communities as well as helping to maintain the viability of individual farm units. The LDP says that the NPA takes a positive view of farm diversification and the relevant policies seek to encourage farm diversification and the use of farm resources for non-agricultural commercial where appropriate in accordance with national planning policy guidance.

### **Recommendation**

- 8.38 That in order to make the Plan sound the following changes are required:

**MAC-7-2, MAC-7-3, MAC-7-4, MAC-7-6, MAC-7-8, MAC-7-9, MAC-7-10, MAC-7-12, MAC-7-13, MAC-7-14, MAC-7-15, MAC-7-16, MAC-11-1, MAC-PM-10**

- 8.39 The following minor change is not required to make the Plan sound, though it would improve the Plan's clarity and precision:

MAC-7-5

## **9 Sustainable Transport**

- 9.1 The LDP acknowledges that the prevailing dispersed settlement pattern of the NP is not sustainable. Outside of Brecon, the majority of the NP is not well served by public transport. There are no railway stations within the NP and walking and cycling are not always feasible options. The NP is therefore particularly dependent on private vehicle transport for residents, visitors and for work-related journeys both to and within the NP. The LDP seeks to promote development that is supported by sustainable transport initiatives and reduces the reliance on private motor vehicles.
- 9.2 The NPA is not a Highways Authority. There are 4 Regional Transport Consortia and 9 constituent Highways Authorities that cover the NP area. The NPA's influence over transport is thus limited, although each of the Highways Authorities must have regard to National Park purposes. The LDP sets out the key areas through which the NPA can influence the reduction in the need to travel and to promote sustainable transport. The spatial strategy seeks to focus development within those settlements with the greatest access to services and access to public transport. The NPA can also influence transport considerations via the negotiation of planning obligations in

partnership with constituent Highways Authorities and through the consideration of development design.

- 9.3 PPW advises that development plans should specify the primary road network and separately identify the core network. These routes should be identified as corridors for movement adjacent to which development that would compromise this role will be resisted<sup>106</sup>. The proposed change to the Proposals Map (**MAC-PM-17**) to identify the primary/core network is recommended to ensure that the Plan is consistent with national planning policy guidance.
- 9.4 The proposed reference to horse riding routes/bridleways in supporting text to Policy 40 'Provision for Cycling and Walking' as set out in MAC-8-5 is supported, given the importance of equestrian activities to tourism.

### **Recommendation**

- 9.5 That in order to make the Plan sound the following changes are required:

#### **MAC-PM-17**

- 9.6 The following minor changes are not required to make the Plan sound, though they would improve the Plan's clarity and precision:

MAC-8-5

## **10 Waste**

### *Assessment of Waste Management Requirements*

- 10.1 TAN 21: 'Waste' refers to the importance of close liaison between National Park and local waste management authorities to ensure that there is an agreed, co-ordinated approach to waste planning. Also, that the waste management requirements of the NP areas should form part of the relevant regional waste plans<sup>107</sup>. The NP lies within two regional waste plan areas and is covered by two documents, the South East Wales Regional Waste Plan 1<sup>st</sup> Review (August 2008) and the South West Wales Regional Waste Plan 1<sup>st</sup> Review (August 2008).
- 10.2 The NP is exempted from providing new facilities for the management of waste that serves more than one local authority area. The NPA is required to accommodate local community waste facilities serving only the NP area and/or to liaise with adjoining waste planning authorities to accommodate new facilities serving both the NP area

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<sup>106</sup> Planning Policy Wales paragraph 8.5.1

<sup>107</sup> PPW TAN 21: 'Waste' paragraph 5.9

and the UA area - to be sited outside the NP<sup>108</sup>. Both Regional Waste Plan 1<sup>st</sup> Review documents identify that in exceptional circumstances there may be sites adjacent to National Parks where facilities with the capacity to serve more than one local authority area, especially those related to agricultural waste, may be acceptable.

- 10.3 The documents advise that requirements for local facilities in National Parks are calculated by dividing the requirements for UA areas by the proportion of population falling within the NP area. The NPA has attempted to gather data as advised but has not been able to ascertain the requirement in each constituent UA. Whilst some data is available for the South West area of the NP, the South East Regional Waste group has been disbanded and the original data is lost. Furthermore, adjacent constituent UAs have not completed their own assessment of requirements.
- 10.4 There is some information regarding Powys which accounts for approximately 70% of the NP's population and a high proportion of its commerce and industry<sup>109</sup>. PCC considers that it is unlikely that an additional waste transfer station would be required during the Plan period. However, if the existing civic amenity facility located at the Ffrwdgrech Industrial Estate in Brecon closes, a new facility may be needed in the Brecon area. PCC may also seek to use their highway depots, including those in the NP, if additional facilities are required in the future<sup>110</sup>.
- 10.5 WG has advised that waste management policy is in a state of change and the detailed context for a move towards the target in Wales' overarching waste strategy 'Towards Zero Waste' is still emerging<sup>111</sup>. Whilst the Collections, Infrastructure and Markets Sector (CIMS) Plan was published in July 2012, the appropriate planning response to the updated assessment contained in this Plan is the subject of current consideration at the national level. Furthermore, the WG does not wish to see any delay in the preparation of LDPs during the period of national planning policy review<sup>112</sup>. In light of these matters, it is not realistic to expect the NPA to accurately establish the total requirement for local facilities for the NP.

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<sup>108</sup> South East Wales Regional Waste Plan (March 2004) and South West Wales Regional Waste Plan 1<sup>st</sup> Review (August 2008)

<sup>109</sup> Waste Issues Paper (September 2010)

<sup>110</sup> Brecon Beacons NPA Hearing Session 4: Economic Wellbeing Statement and Appendix 2

<sup>111</sup> Additional Work as agreed at the Exploratory Meeting (August 2012)

<sup>112</sup> Publication of CIMS Plan and its role relative to Regional Waste Plan First Reviews – Interim Planning Position (CL-01-12)

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### *Approach to the Provision of Local Waste Facilities*

- 10.6 Accordingly, on WG advice, the NPA has sought to identify potential sites that would be suitable for local waste facilities, should a need be identified in future. As part of the ELR, 9 existing employment sites (B use class) were assessed for their potential to accommodate waste facilities. Five sites were considered suitable due to their existing uses (which include B2 uses). In addition, the 10 potential employment sites were assessed in terms of their suitability to accommodate a local waste facility as part of the ELR. It was found that 3 of these sites may comprise suitable locations subject to further investigation and once the exact form of waste facility required is known.
- 10.7 Proposed changes to the supporting text to Policy 42 'Local Waste Management Facilities' listing the 5 employment sites where future proposals would be considered (**MAC-9-1**) would provide clarity and additional flexibility by providing options over the Plan period should the requirement to accommodate local waste facilities arise.
- 10.8 Deleting the word "only" from the first line of Policy 42 which says "Local waste management and recycling facilities which **only** serve the NP area will be permitted provided..." (**MAC-9-2**) would provide additional flexibility. Local facilities could then mean facilities which serve a local need in the NP as well as those serving areas near the boundaries of the NP, thereby contributing to the overall waste network and ensuring a co-ordinated approach to waste planning.
- 10.9 In conclusion, the NPA has adequately considered the potential for sites in the NP to accommodate a local waste facility if the need arises. Furthermore, Policy 42 is criteria based and, subject to the proposed changes, would be sufficiently flexible to guide decisions on the suitability of sites for a local waste facility. Subject to these changes the Plan would satisfy the coherence and effectiveness tests of soundness.

### **Recommendation**

- 10.10 That in order to make the Plan sound the following changes are required:

**MAC-9-1, MAC-9-2**

## **11 Minerals Resources**

### *Minerals Safeguarding*

- 11.1 Minerals Planning Policy Wales (MPPW) makes clear that minerals development should not take place in National Parks unless in

exceptional circumstances<sup>113</sup>. However, the importance of safeguarding mineral deposits is recognised. This does not necessarily indicate an acceptance of working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction have been considered. Areas to be safeguarded should be identified on proposals maps and policies should protect potential mineral resources from other types of permanent development which would either sterilise them or hinder extraction<sup>114</sup>.

- 11.2 The Aggregates Working Parties for North and South Wales are required to produce Regional Technical Statements (RTS) for Aggregates. The NP area is within the South Wales region. The RTS says that land-based sand and gravel resources should be safeguarded from prejudicial development. Provision can be made to meet a specific need for sand and gravel but only where these can be worked without significant adverse environmental effects.
- 11.3 Areas where mineral resources are safeguarded are shown on the Proposals Map which distinguishes between sand and gravel, limestone and sandstone. During the examination an Aggregates Safeguarding Map was published alongside the Mineral Resources Map for Wales produced by the British Geological Survey (BGS) in 2010. The WG<sup>115</sup> says that this map provides a key evidence base for LDP preparation and an opportunity to secure a consistent, strategic and longer term approach to resource protection. Accordingly, the NPA has updated the Proposals Map to ensure that the safeguarding areas are consistent with the BGS Aggregates Safeguarding Map for Wales (**MAC-PM-18**).
- 11.4 Proposed cross-reference to Policy SP2 'Major Development in the National Park' in Policy 45 'Minerals Safeguarding' (**MAC-10-1**) would provide additional clarity and consistency with national planning policy guidance. It would be clear that extraction of minerals will only be permitted provided that there is no suitable alternative location and an overriding need for the development in line with the advice in MPPW and PPW<sup>116</sup>.

#### *Safeguarding of Coal Resources*

- 11.5 MPPW Minerals Technical Advice Note (MTAN) 2: 'Coal' requires mineral planning authorities to set out their strategy for the sustainable management of the coal resource in the LDP, where relevant. For certainty, areas where coal should not be worked,

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<sup>113</sup> Minerals Planning Policy Wales (MPPW) paragraph 21

<sup>114</sup> MPPW paragraph 13

<sup>115</sup> WG letter to Chief Planning Officers dated 14 November 2012

<sup>116</sup> MPPW paragraph 21 and Planning Policy Wales paragraph 5.5.6

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buffer zones around existing and proposed coal working sites and areas to be safeguarded should be shown on the Proposals Map<sup>117</sup>. In its response to the Preferred Strategy, the Coal Authority confirmed that there is no requirement to safeguard coal resources in the NP and the LDP makes this clear.

### *Strategic Objectives for Minerals*

- 11.6 The RTS recommends that the possibility of a gradual transfer of production from the Brecon Beacons NP to other areas should be explored with other mineral planning authorities (MPAs) and the industry. MPAs are expected to take account of local circumstances. A sub-group of the South Wales Regional Aggregates Working Party was established to investigate this recommendation. In addition, aggregate sales information for all minerals operators within the region was collated in order to study supply and demand within the region as well as information on sales, reserves, landbanks, sand and gravel and secondary aggregates<sup>118</sup>.
- 11.7 The RTS indicates that in most instances, meeting the demand currently sourced from National Parks from other areas would be feasible over the medium term (5-10 years) without transferring an unacceptable burden to other MPA areas. In addition, the NPMP says that it seeks to explore more local and sustainable options to supplement or replace the need for mineral resources. Examples include the use of secondary, recycled or waste materials, using alternative materials (e.g. wood, straw, mud), and by finding alternative and sustainable sources of mineral aggregates. This approach is reflected in LDP Policy 47 'Recycled, Secondary and Waste Materials' which encourages the use of recycled waste materials and secondary aggregates in line with MTAN1: 'Aggregates'.

### *Inactive Sites*

- 11.8 MPPW says that inactive sites with planning permission for future working which are considered unlikely to be reactivated for the foreseeable future should be identified in the development plan and be the subject of a suitable strategy and associated policies to explain future proposals for the land. The strategy should outline the authority's overall approach to such sites<sup>119</sup>. Policy 48 'Inactive Mineral Sites' is clear that where the NPA is satisfied that the working of minerals has ceased permanently it will serve a Prohibition Order to the owner(s).

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<sup>117</sup> MTAN 2 paragraph 22

<sup>118</sup> Minerals Issues Paper (September 2010)

<sup>119</sup> MPPW paragraph 19

11.9 The LDP contains a list of sites where Prohibition Orders have been made. It also lists sites where such orders were served but subsequently withdrawn and sites where future Prohibition Orders may be served<sup>120</sup>. Proposed changes (**MAC-10-3**) to clarify how and under what circumstances further orders would be served on those sites listed would provide greater certainty for the owner(s).

#### *Small Scale Quarrying for Local Needs*

11.10 National planning policy guidance acknowledges that suitable stone is important for the restoration of historic buildings and ancient monuments<sup>121</sup>. Research undertaken by the National Museum for Wales<sup>122</sup> found that there was not just one type of building stone across the NP. The research identified 8 'domains' where a particular type of stone was prevalent and that much of the building stone types within the different 'domains' were already sourced from existing quarries within the NP or just outside its boundary. There is no identified need for new quarries within the NP to meet demand within the 'domains.' Furthermore, mineral developments should not take part in National Parks unless in exceptional circumstances.

11.11 There is thus no identified need to include a specific policy for small scale quarries and any applications could be assessed against other LDP policies such as Policy 46 'Borrow Pits' and Policy 1 'Appropriate Development.' However, as a limited amount of quarrying takes place in the NP, the proposed identification of quarries and the material quarried on the Proposals Map (**MAC-PM-18**) would provide additional clarity and consistence with national minerals planning policy.

11.12 In conclusion, the overall policy approach to minerals is sound, subject to the changes referred to above.

#### **Recommendation**

11.13 That in order to make the Plan sound the following changes are required:

#### **MAC-10-1, MAC-10-3, MAC-PM-18**

11.14 The following minor change is not required to make the Plan sound, though it would improve the Plan's clarity and precision:

#### MAC-10-2

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<sup>120</sup> LDP Appendix 9

<sup>121</sup> MPPW paragraph 72

<sup>122</sup> 'Building Stone Use in the Brecon Beacons National Park' (July 2009)

## 12 Sustainable Infrastructure

### *Mitigating Impact*

- 12.1 The LDP identifies key areas of constraint which may impact upon deliverability of development and may need to be addressed in development proposals. In many instances these key areas of constraint may require actions which are beyond the jurisdiction of the NPA and LDP. Proposed changes to paragraph 5.2 (**MAC-5-1**) would better reflect that in some circumstances overcoming constraints will require collaborative working between the developer, NPA and other stakeholders such as those with a statutory interest.

### *Planning Obligations*

- 12.2 Policy 35 'Planning Obligations' requires development to provide mitigatory and enhancement measures to compensate for any unacceptable impact arising from development and/or to contribute to new or improved infrastructure, services or community facilities that are necessary to make the development acceptable. The Plan sets out the two types of contributions sought. Category 1 contributions are specific to the NP whilst Category 2 contributions are for the socio-economic benefit of the community that rely on partnership working with the NPA's constituent UAs and/or community service providers. Proposed changes to the supporting text clarify that Category 1 contributions are a priority (**MAC-A-5**).
- 12.3 The NPA propose that the supporting text to Policy 35 is amended to identify that planning obligations would be determined on a case by case basis (**MAC-8-9**). The revised wording would ensure that the cumulative impact of the Plan's policies would be taken into account in considering the viability and deliverability of development. As such, the changes would bring the Plan in line with the provisions of WG Circular 13/97 'Planning Obligations' and the CIL Regulations 2010 (as amended).
- 12.4 Further proposed changes to Policy 35 and to the supporting text (**MAC-8-2** and **MAC-8-6**) would also reflect the possibility of a CIL charging schedule being introduced in the NP during the lifetime of the Plan. Additional clarification will be provided by updated SPG on developer contributions, proposed to be referred to in the supporting text (**MAC-8-10**).

### *Sustainable Infrastructure*

- 12.5 Policy SP 16 'Sustainable Infrastructure' relates to the provision of infrastructure to meet the needs of the resident communities of the NP. Proposed changes to the supporting text to cross reference to the requirements of development for allocated sites included in the



LDP Appendices (**MAC-8-7**) will improve the Plan's coherence and help to ensure that all relevant factors which will influence the delivery of infrastructure can be taken into consideration.

### *Community Facilities and Open Space*

- 12.6 The LDP supports proposals which will strengthen and enhance the provision of community facilities through its spatial strategy policies. Such uses include outdoor recreation facilities such as playing fields, children's play areas, accessible natural green space and allotments. These and other existing facilities are protected by Policy 32 'Retention of Existing Community Facilities' as required by PPW<sup>123</sup>.
- 12.7 However, the Plan does not set standards of provision or the minimum acceptable size of particular forms of provision, as advised by PPW and TAN 16: 'Sport, Recreation and Open Space'<sup>124</sup>. Instead the NPA relies on the relevant spatial strategy policies to encourage the creation of new or enhanced community facilities and Policy 35 'Planning Obligations' to deliver amenity space along with other facilities in conjunction with new development and in partnership with its constituent UAs.
- 12.8 The policy approach is not as prescriptive as that suggested by national planning policy guidance but is capable of delivering appropriate recreation and amenity space in association with new development. Policy 35 seeks to balance the need for facilities in association with new development, including amenity space, against viability considerations. The approach is thus realistic as it will support efforts by the NPA, in partnership with others, to provide amenity space without imposing requirements which are not deliverable. An indicator proposed to be included in the Monitoring Framework would help to ensure that the amenity space provision does not fall significantly below the standards sought by the NPA's constituent UAs (**MAC-11-1**).
- 12.9 Proposed changes to the supporting text of Policy 32 would clarify how the alternative replacement of lost community facilities will be assessed (**MAC-8-12**) and would improve the Plan's coherence and consistency of interpretation.

### *Power-lines and Pipelines*

- 12.10 Policy 36 'Power-lines and Pipelines' permits cables, pipelines and associated development where the least obtrusive and damaging location, route or means of provision is chosen without unacceptable

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<sup>123</sup> Planning Policy Wales paragraph 11.2.2 and 11.2.3

<sup>124</sup> Planning Policy Wales paragraph 11.2.2 and TAN 16: 'Sport, Recreation and Open Space' paragraph 3.14

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impact on the NP and requires a through assessment of the environmental risks identified in route selection to be undertaken.

- 12.11 Whilst the LDP makes no reference to the financial implications of route selection, the Policy says that where necessary, conditions or Planning Obligations will be utilised to ensure satisfactory compensation or enhancements are provided in mitigation for any adverse impact upon the NP. Policy 35 makes clear that contributions will be assessed on a case-by-case basis in line with the provisions of WG Circular 13/97 'Planning Obligations.'

### **Recommendation**

- 12.12 That in order to make the Plan sound the following changes are required:

**MAC-5-1, MAC-8-2, MAC-8-6, MAC-8-7, MAC-8-9, MAC-8-10, MAC-8-12, MAC-A-5,**

- 12.13 The following minor change is not required to make the Plan sound, though it would improve the Plan's clarity and precision:

MAC-8-1

### **13 Other Development Policy Matters**

- 13.1 Policy CYD LP1 'Enabling Appropriate Development' relates to development proposals within the countryside and includes criteria for the extension of residential dwellings including that they should be appropriate in scale and design and would result in a net increase of no more than 30% or the original dwelling size. The policy cross-references to Policy 12 'House Extensions and Ancillary Buildings' which sets out criteria whereby extensions and ancillary buildings to dwellings will be permitted, including where the proposal would be appropriate to the scale and design and setting of the original dwelling.
- 13.2 Proposed changes to the supporting text (**MAC-4-24**) to Policy CYD LP1 would provide further clarification of how the original dwelling would be defined within the Plan thereby improving the clarity and consistency of interpretation of both policies. In response to representations that Policy CYD LP1 and other policies are too prescriptive and would inhibit good design, the NPA says that guidance to this effect has worked well with the existing approved UDP and has not been applied inflexibly.
- 13.3 LDP Wales advises that LDPs should not include policies to cover every eventuality. The policies, when read in the context of the Plan as a whole together with national planning policy, would provide a

sufficiently robust framework to assess most types of development that could reasonably be anticipated to arise. Overall, I consider that the LDP includes clear policies on design which are capable of addressing local issues as well as being sufficiently flexible to secure good design when applied to the local context, as required by TAN 12: 'Design'<sup>125</sup>.

- 13.4 A number of changes are proposed to policies and the supporting text which would not only improve the Plan's clarity and consistency of interpretation but are considered necessary to ensure that the policies are sufficiently clear and can be effectively monitored and implemented. These MACs are recommended below.

### Recommendation

- 13.5 That in order to make the Plan sound the following changes are required:

**MAC-(3)4-1, MAC-4-2, MAC-4-6, MAC-4-10, MAC-4-11, MAC-4-12, MAC-4-13, MAC-4-14, MAC-4-15, MAC-4-16, MAC-4-17, MAC-4-18, MAC-4-19, MAC-4-24, MAC-3-7, MAC-3-9, MAC-3-13, MAC-6-1, MAC-6-6, MAC-7-7, MAC-8-3, MAC-8-8, MAC-8-11**

## 14 Monitoring and Implementation

- 14.1 The submitted Plan includes a separate Monitoring Framework which sets out the key indicators and targets that will be used to monitor delivery of LDP policies and proposals. It includes reference to other organisations, plans and strategies which may have an influence on the implementation of the LDP policies.
- 14.2 During the examination process the NPA has developed in greater detail the targets and indicators for monitoring each of the strategic policies in the Plan. It proposes changes (**MAC-11-1**) which have been referred to throughout the report as well as changes to the targets and triggers ensuring that they are measurable and clear. This would enable the Monitoring Framework to be used to monitor progress of the Plan more accurately and to assess whether the LDP is being delivered in accordance with the Plan strategy. It would enable strategies or policies to be revised where necessary.
- 14.3 With these changes the Plan provides a robust mechanism for monitoring delivery, implementation and to establish when the Plan or individual policies may need to be reviewed. It is also sufficiently flexible to deal with changing circumstances. In conclusion, these

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<sup>125</sup> PPW TAN 12: 'Design' paragraph 6.2

changes ensure that the Plan satisfies the coherence and effectiveness soundness tests.

### **Recommendation**

14.4 That in order to make the Plan sound the following changes are required:

**MAC-11-1**

### **15 Overall Conclusions**

15.1 I conclude that, with the changes that have been recommended as set out in Appendix A of this report, the Brecon Beacons National Park Local Development Plan 2007 - 2022 satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural, consistency and coherence and effectiveness tests of soundness in LDP Wales.

*R Phillips*

INSPECTOR

**Appendix A:**

**The Authority's proposed changes recommended by the Inspector**



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2013

SCHEDULE OF MATTERS ARISING CHANGES (VERSION 5)

## **Matters Arising Changes**

### **Explanatory Note**

The Schedule of Matters Arising Changes (MACs) to the Brecon Beacons National Park Authority Local Development Plan (LDP) provides a single reference point for all the MACs that have arisen during discussion at the LDP Examination hearing sessions.

The Schedule is set out in Chapter order.

**PLEASE NOTE:** All references throughout the LDP to Countryside Council for Wales (CCW), Environment Agency Wales (EAW) and Forestry Commission Wales (FCW) will be replaced by Natural Resources Wales (NRW) at print stage.





## Chapter 2: Vision and Objectives

Change Number	AFC/Composite Plan Part	Reason	MAC
MAC-2-1	Para 2.2.1	Grammatical error	Last sentence of paragraph amended as follows: “The LDP Vision therefore seeks to translate the NPMP Vision into a vision which addresses those areas which the Authority is able to address through the LDP process.”
MAC-2-2	Para 2.3.2 (FC 2-TA-4)	Suggested by CCW	Paragraph amended as follows: “The NPA has aimed to ensure that the LDP objectives translate the statutory purpose and duty of designation in their aim and focus. The NPA recognise that in enabling development within a protected landscape there is the potential for conflict to arise between achieving our objectives. Where such conflict is irreconcilable, in accordance with the Sandford Principle, Strategic Objectives relating to National Park Purposes (suffixed SQ) will take priority. Where there is conflict between objectives referring to the 1 <sup>st</sup> and 2 <sup>nd</sup> National Park purposes, in accordance with the Sandford Principle, strategic objectives referring to the 1 <sup>st</sup> Park purpose will take priority.”
MAC-2-3	Para 2.4	As suggested by the Inspector	Title amended as follows: <b>Environmental Capacity Approach to Sustainable Development</b>
MAC-2-4	Para 2.4.1	As above	Paragraph amended as follows:  Taken in combination the LDP Strategic Objectives seek to enable development in keeping with the “Environmental Capacity” approach to Sustainable Development of the National Park. Within the LDP you will often come across these terms. It is important therefore that they are clearly defined and properly understood as a starting point for reading the plan.
MAC-2-5	Para 2.4.3	As above	Additional paragraph inserted immediately after 2.x.2 as follows:  Sustainable Development in Wales is defined in Chapter 4 of Planning Policy Wales at Figure 4.1 as “.....enhancing the economic, social and environmental well being of people and communities, achieving a better quality of life for our own generations in ways which; promote social justice and equality of opportunity; and enhance the natural and cultural environment and respect its limits – using only our fair share of the earth’s resources and sustaining our cultural legacy.” <sup>1</sup> The National Park Authority has taken these principles and adapted it to an approach appropriate to development in a protected landscape. The strategy and policy approach in the LDP reflects the objective of the Welsh Government for Wales to become a sustainable nation. The Plan seeks to balance and integrate the key themes of a sustainable Wales by delivering proposals for a sustainable environment and living within environmental ‘limits’, the sustainable use of resources, a sustainable economy and a sustainable society.
MAC-2-6	Para 2.4.5	As above	Paragraph amended as follows:  This LDP therefore takes an Environmental Capacity approach to the future sustainable development of the National Park. This is defined by the NPA as the ability of a place to accept development demands placed upon it without irreversible loss or damage to the environment, natural beauty, infrastructure or

			community resources taking into consideration the need to protect against the likely and predicted effects of climate change. Capacity in this understanding is the “threshold” of acceptable change for any given place based upon the definition of capacity.
<b>MAC-2-7</b>	Para 2.4.8	As above	<p>Paragraph amended as follows:</p> <p>All Policies and proposals within this plan have been formulated in accordance with the Environment Capacity approach to Sustainable Development. In general the environmental capacity of a place is set in this LDP by Settlement Boundaries/Extents as shown on the Proposals Map. However all the Policies within the LDP aim to enable development in accordance with our understanding of the environmental asset and limits of the National Park.</p>
<b>MAC-2-8</b>	Footnote	As above	<p>Footnote added as follows:</p> <p><sup>1</sup> <u>Planning Policy Wales, Edition 5, Welsh Government, November 2012.</u></p>

### Chapter-3: Overarching Policies

Change Number	AFC/Composite Plan Part	Reason	MAC
<b>MAC-3-1</b>	AFC-4-1/Para 3.16.3.3	As suggested by the Environment Agency Wales	<p>Paragraph 4.15.3.3 amended as follows: The following forms of development within the countryside are considered to be highly vulnerable to flood risk.</p> <p>Sites for Gypsy and Travellers Storage of Caravans New Buildings for Tourism Accommodation Non- Permanent Tourism Accommodation New or Extended sites for Touring Caravans, Camper Vans and Tents New or Extended Outdoor Activity Centres.</p> <p>Development proposals for the above forms of development must be able to demonstrate that any future flood risk and consequence has been managed in line with the requirements of TAN 15, to the satisfaction of the NPA in consultation with the Environment Agency.</p> <p>However, sites in zone C2 should not be allocated for highly vulnerable development in accordance with the advice set out in paragraph 6.2 of TAN 15. Development proposals for other built development should be justifiable under sections 6 and 7 and appendix 1 of TAN 15.</p>
<b>MAC-3-2</b>	Paragraph 3.6.2	As suggested by CCW	<p>Paragraph amended as follows:</p> <p>In addition to the policy requirements set out below, and in line with the Habitat Regulations (March 2010) and in consultation with CCW, survey and project level HRA should be undertaken if necessary where development may have a significant impact on a European site (e.g. SAC) and any other sites that national policy indicates should be subject to HRA (e.g. possible SAC).</p>
<b>MAC-3-3</b>	Policy 51 Sites of European Importance	As suggested by CCW	<p>Policy wording amended as follows:</p> <p><b>Policy 51 Sites of European Importance</b></p> <p>Proposals for development which may have a significant effect on a European Site or potential European Site, when considered alone or in combination with other plans or projects, will not be permitted unless:</p> <ul style="list-style-type: none"> <li>i) the proposed development is directly connected with or necessary for the protection, enhancement and positive management of the site for conservation purposes;</li> <li>ii) the proposed development will not adversely affect the conservation objectives associated with the site or the integrity of the site;</li> <li>iii) where the site supports interests not identified as a priority habitat or species, there are imperative</li> </ul>

			<p>reasons of overriding public interest why the development should proceed;</p> <p>iv) where the site supports priority habitats and/or species, there are reasons of human health, public safety, beneficial consequences of primary importance to the environment or other grounds for overriding public interest that can satisfy the requirements as to why the development should proceed; and</p> <p>v) with respect to iii) &amp; iv) above there is no alternative solution, and compensatory measures are secured to ensure that the overall coherence of the Natura 2000 network is protected.</p>
<b>MAC-3-4</b>	Paragraph 3.10.3	As suggested by CCW	<p>Paragraph amended as follows:</p> <p>In accordance with the principles of sustainable development the NPA will seek to ensure that no adverse impact occurs to the water environment as a result of development. Developers will need to take into consideration the quality and the quantity of the local water resource, considering how their proposal will impact on the water environment as a whole, including ensuring the protection of water sources, aquatic ecosystems and associated habitats. This is particularly important in terms of any development proposal that is likely to impact on the Rivers Usk and Wye SACs.</p>
<b>MAC-3-5</b>	Policy 52 Sites of National Importance	As suggested by CCW	<p>Policy wording amended as follows:</p> <p>“Proposals for development which may affect a National Nature Reserve or proposed or notified Sites of Special Scientific Interest will only be permitted where:</p> <p>i) the proposal contributes to the protection, enhancement or positive management of the site; or</p> <p>.ii) the developer proves to the satisfaction of the NPA that the proposal has no unacceptable impacts which would directly or indirectly damage the site, detrimentally affect its conservation interest or its value in terms of its designation; or</p> <p>iii) the need and reasons for the proposed development outweigh the value of the site itself and there are no alternative means of meeting the need for the development.</p> <p>Where appropriate the NPA will consider the use of Planning Conditions and/or Planning Obligations to provide appropriate mitigation and/or compensatory measures.”</p>
<b>MAC-3-6</b>	Policy 53 Sites of Importance for Nature Conservation	As suggested by CCW	<p>Policy wording amended as follows:</p> <p>Development on non-statutory sites of wildlife, geological or geomorphological importance will only be permitted where:</p> <p>i) the need for the development outweighs the nature conservation importance of the site; and</p> <p>ii) the proposals comply with Policy 3 and/or, where protected and important wild species are concerned, with Policy 2.</p> <p>Where appropriate the NPA will consider the use of Planning Conditions and/or Planning Obligations to provide appropriate mitigation and/or compensatory measures.</p>
<b>MAC-3-7</b>	Paragraph 3.7.6.1	As suggested by CCW	<p>Paragraph amended as follows:</p>

			Species which are protected by UK law are listed in the Wildlife and Countryside Act 1981 as amended and the Protection of Badgers Act 1992. European protected species are listed in the Habitats Regulations, Schedules 2 and 4 (see also Section 42 of the NERC act habitats and species of principle importance to Wales). Moreover Section 40 of the NERC act imposes a duty on all public bodies such that “every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions to the purpose of conserving biodiversity. CCW, RSPB, local wildlife trusts or the NPA may identify other species as regionally rare or locally important. The focus for action on the listed species and habitats found locally will be through the Local Biodiversity Action Plans (LBAPs).
<b>MAC-3-8</b>	Paragraph 3.7.6.2	As suggested by CCW	<p>Paragraph amended as follows:</p> <p>The presence of a protected or locally important species is a material consideration in development decisions. The National Park LBAP contains details of the species that are of particular importance in the National Park and those which require urgent action for maintenance of population levels. A full list of LBAP species can be found in the BBNPA Biodiversity SPG. The survival of both plant and animal species may depend on the availability of specialised habitats, which for animals include sheltering, feeding, breeding, roosting/resting and wintering areas. It may sometimes be possible for a development to incorporate proposals for replacement habitats for species. Where protected species are present or likely to be present the NPA will require an ecological survey by the developer and an assessment of the likely impact of the development on the protected species. The NPA will consider the attachment of Planning Conditions or enter into agreements that would overcome the potentially damaging effects of development on the habitats of species of conservation importance. Furthermore the NPA will encourage the applicant to identify and include measures that contribute to the restoration or expansion of important habitats, and these will be set out in the landscaping and planting Planning Conditions that accompany planning permissions.</p>
<b>MAC-3-9</b>	Paragraph 3.7.6.3	As suggested by the Inspector	<p>Paragraph amended as follows:</p> <p>Developments which would harm European protected species require a derogation granted by Natural Resources Wales which will only be granted for developments for public health and safety or other reasons of overriding public interest.</p>
<b>MAC-3-10</b>	Paragraph 3.9.1 (Ancient Woodland and Veteran Trees)	As suggested by CCW	<p>Paragraph amended as follows:</p> <p>Ancient Woodlands are a valued and irreplaceable resource. Ancient woodland is land that has had a continuous woodland cover since at least 1600 AD and may be ancient semi-natural woodland (ASNW), which retains a native tree and shrub cover that has not been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally, or plantation on ancient woodland sites (PAWS) where the original tree cover has been felled and replaced by planting, often with conifers, and usually over the last century. Having been present in the landscape over many centuries they are rich in wildlife and are more likely to support rarer species and to contain special features. Ancient Woodland is also more likely to contain features of historical and archaeological importance. Their rarity and importance means that these areas should be protected.</p>

<b>MAC-3-11</b>	Paragraph 3.15.1.4	As suggested by the Inspector	Paragraph amended as follows:  In line with the Conserving the Historic Environment Objectives set out in PPW, it is important to identify and protect the Park's heritage for environmental, social, cultural and economic reasons. It is an asset valued by local residents and visitors, and contributes to the special qualities of the Park which it is the NPA's duty to enable people to understand and enjoy. The NPA's tourism strategy recognises the important contribution that the Park's cultural heritage makes in drawing tourists to the area, and the potential that it has for contributing to the local economy.
<b>MAC-3-12</b>	Paragraph 3.15.8.3	As suggested by the Inspector	Paragraph amended as follows:  Where development involves a site listed within the Register, the NPA will use the Register to assess whether the development is of sufficient scale to have more than local impact on the historic landscape. Where necessary, an assessment of the significance of the impact of development on historic landscape areas will be required.
<b>MAC-3-13</b>	Policy SP9 Renewable Energy	As suggested by the Inspector	Criterion b) of the policy amended as follows:  "they do not have a significant adverse impact on the Natural Beauty, wildlife, cultural heritage and special qualities of the National Park;"
<b>MAC-3-14</b>	Policy 61 Development Affecting Conservation Areas	In line with PPW as suggested by the Inspector	Criterion 1 amended as follows:  "New development and alterations to existing buildings within or affecting the setting of a Conservation Area will only be permitted where it will preserve or enhance the character or appearance of the area and where the design, all building materials, proportions and detailing are appropriate to the Conservation Area."
<b>MAC-3-15</b>	Paragraph 3.16.0.5	As suggested by the Inspector	Paragraph amended as follows:  In implementing this strategy all development, where relevant, will be subject to meeting the aims of Strategy Policy 4 Climate Change and this will need to be explained in detail within the accompanying Design and Access Statement.
<b>MAC-3-16</b>	Policy SP4 Climate Change	As suggested by the Inspector	All proposals will be required to demonstrate where relevant how the development will; a) Be resilient and adaptable to the likely effects of climate change b) Limit and mitigate the causes of climate change; and c) Contribute to the aim of carbon neutrality
<b>MAC-3-17</b>	4.9	As suggested by the Inspector	Section 4.9 Water Resources DELETED Policy 5 Water Resources DELETED
<b>MAC-3-18</b>	Policy 9 4-P-25	As suggested by the Inspector	Policy 9 Sustainable Design in the Adaption and Re-use of Existing Buildings amended as follows:  All proposals which would that will result in the creation of new habitable space either through a) The extension of an existing dwelling; or

			<p>b) The conversion of an existing building</p> <p>Will be required to adhere to the principles of sustainable development in their design, construction and energy performance.</p> <p>All such proposals will be required to demonstrate that they would achieve minimum standards—for sustainable design appropriate to their time of application</p> <p>The application of low and Zero Carbon technologies within the scheme to address increased energy consumption must be investigated and detailed within the Design and Access Statement accompanying the application, where the application of such technology is found to be applicable they must be employed within the scheme.</p>
<b>MAC-3-19</b>	SP11 4-P-24	As Suggested by the Inspector	<p>Strategic Policy SP11 Sustainable-Design amended as follows:</p> <p>All proposals for development will be required to address the principles of sustainable design by demonstrating that they:</p> <ul style="list-style-type: none"> <li>a) Meet National and where defined local requirements for sustainable design or higher,</li> <li>b) Are able to demonstrate consideration of the use, and where appropriate the application of, renewable energy sources.</li> </ul>
<b>MAC-3-20</b>	4.15.13	In response to policy change suggested by the Inspector	Section 4.15.1.3 DELETED
<b>MAC-3-21</b>	3.16.1.4	In response to policy change suggested by the Inspector	The NPA will therefore require all development to reach at least national standards for sustainable design as set out in Planning Policy Wales, with the aim of achieving higher sustainable building standards in future reviews of this plan where evidence suggests it is achievable.
<b>MAC-3-22</b>	4.14.1.7	In response to policy change suggested by the Inspector	Section 4.15.1.7 DELETED
<b>MAC-3-23</b>	Policy 5 Sustainable Use of Water	As suggested by the Inspector	<p>Policy wording amended as follows:</p> <p><b>The NPA will seek to ensure that all future development proposals consider the incorporation of the highest standards for water management.</b></p>

## Chapter 4: Spatial Strategy

Change Number	AFC/Composite Plan Part	Reason	MAC							
MAC-(3)4-1	Para 4.2.1	Reference error	Paragraph 4.2.1 deleted.							
MAC-4-2	B LP1 Brecon Appropriate Development	Suggested by Inspector	2 <sup>nd</sup> Paragraph amended as follows: “All proposals for development within the Primary Key Settlement of Brecon must demonstrate to the satisfaction of the NPA how they respond to the identified issues set out at table 4.3 and how the scheme will contribute to achieving the Brecon 15 year Future Vision.”							
MAC-4-3	B LP1 Brecon Appropriate Development	Covered by other policies in the plan	Criterion 9 deleted.							
MAC-4-4	Para 4.3.4.5	Repeats national policy	Paragraph 4.3.4.5 deleted.							
MAC-4-5	Para 4.4.1/Table 4.4	Formatting	<p>Hay-On-Wye and Sennybridge and Defynnog inserted into text boxes as follows:</p> <table border="1"> <tr> <td rowspan="3" style="writing-mode: vertical-rl; transform: rotate(180deg);">Hay-on-Wye</td> <td>Location &amp; Population</td> <td>Hay-on-Wye lies at the north eastern tip of the National Park, on the boundary between England and Wales. The population is approximately 1500 making Hay-on-Wye our smallest Key Settlement by population. The community comprises little more than the town itself, bounded by the River Wye to the north and the English border to the east.</td> </tr> <tr> <td>Townscape</td> <td>Hay-on-Wye is an Historic Market town dating back to the Norman period. The Settlement lies within the Middle Wye Historic Landscape as defined by the Register of Historic Landscapes; key landscape features traces of medieval field system lying to the south and west of the existing Settlement. The town itself contains significant buildings from the 13<sup>th</sup> Century to the 19<sup>th</sup> century, demonstrative of the town’s history, from Norman beginnings, through medieval market town to present day service centre. There are many other notable historic buildings including St John’s chapel, the Cheese Market and the Butter Market, and many listed buildings, some dating back to the 16<sup>th</sup> Century, in a maze of narrow streets. The architectural significance of many of the town’s buildings has led to the area being designated as a conservation area.</td> </tr> <tr> <td>Culture</td> <td>Hay-on-Wye is synonymous with books and literature. The annual Hay Festival has grown in stature and scale in recent years becoming the international Hay Festival of Literature and the Arts, attracting a worldwide audience and giving Hay-on-Wye a strong cultural identity. The success of the literature festival has engendered a diverse and</td> </tr> </table>	Hay-on-Wye	Location & Population	Hay-on-Wye lies at the north eastern tip of the National Park, on the boundary between England and Wales. The population is approximately 1500 making Hay-on-Wye our smallest Key Settlement by population. The community comprises little more than the town itself, bounded by the River Wye to the north and the English border to the east.	Townscape	Hay-on-Wye is an Historic Market town dating back to the Norman period. The Settlement lies within the Middle Wye Historic Landscape as defined by the Register of Historic Landscapes; key landscape features traces of medieval field system lying to the south and west of the existing Settlement. The town itself contains significant buildings from the 13 <sup>th</sup> Century to the 19 <sup>th</sup> century, demonstrative of the town’s history, from Norman beginnings, through medieval market town to present day service centre. There are many other notable historic buildings including St John’s chapel, the Cheese Market and the Butter Market, and many listed buildings, some dating back to the 16 <sup>th</sup> Century, in a maze of narrow streets. The architectural significance of many of the town’s buildings has led to the area being designated as a conservation area.	Culture	Hay-on-Wye is synonymous with books and literature. The annual Hay Festival has grown in stature and scale in recent years becoming the international Hay Festival of Literature and the Arts, attracting a worldwide audience and giving Hay-on-Wye a strong cultural identity. The success of the literature festival has engendered a diverse and
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				<p>artisan spirit within Hay-on-Wye which has led to other events and festivals, such as the Hay-on-Wye food and drink festival and 'How the Light Shines in Festival of Music and Philosophy'. These all combine to make Hay-on-Wye a popular destination for tourists and visitors who come to experience the unique character of the town, with the many second hand and specialist book dealers, and independent retailers which showcase local arts and crafts.</p>
			Economy	<p>Hay-on-Wye is a traditional Market Town. The weekly Thursday market centering on the Memorial Square and the Butter Market showcases much local food produce and strongly contributes to the overall vitality and strength of the town. As well as books, Hay-on-Wye is fast becoming known for the quality of the hospitality provision, capitalising on the quality of the local produce, with award winning restaurants and gastro-pubs offering a range of different styles of cuisines. The area is a key tourist destination within the National Park and a strong and vibrant town centre, providing a range of employment options.</p>
		Sennybridge and Defynnog Key Settlement	Location & Population	<p><b>Sennybridge</b>, lies on the A40T at the confluence of the Rivers Senni and Usk. There was a small castle on the site in the 13th century, but the village grew in importance after the coach road was built in 1819, and again with the completion of the Neath and Brecon railway (now closed). Since the last war, Sennybridge has been the site of an army camp serving the training area on Mynydd Eppynt.</p> <p><b>Defynnog</b> lies on the A4067 south of Sennybridge. The parish church is here, and the village was the centre for a large community until the growth of Sennybridge. There are rows of older terraced cottages around the church and pubs, with newer development along the A4067.</p> <p>Together the two settlements make up the <b>Sennybridge and Defynnog Key Settlement</b>.</p> <p>The Sennybridge and Defynnog Key Settlement is a strategic centre linking the western area of the National Park with key West Wales Settlements such as Llandovery and Llandeilo.</p>
			Built Environment	<p>Sennybridge consists of a mixture of housing types, from older terraced properties situated along the A40T, to more recent estates and detached single and two-storey dwellings, constructed on its outskirts.</p> <p>There is a strong contrast between the core of Sennybridge and the Defynnog area of the Cluster. In Defynnog the housing stock is predominately older. A strong sense of place is engendered travelling through Defynnog along the A4067, with traditional stone faced</p>

				terracing lining the road, forming the historic core. The listed lime-washed church at Defynnog is striking within the valley landscape, forming an iconic and picturesque view of the village on the northern and southern approaches.
			Economy	Sennybridge is an important source of employment, with the army camp, sawmills, haulage contracting, agricultural related stores and local shops. It plays a significant role for the farming industry with its weekly and monthly market and related feed and equipment facilities. The annual Sennybridge Agricultural Show takes place in late summer. The scale and popularity of the show highlights the important status of Sennybridge for the agricultural community.
			Services	Sennybridge and Defynnog includes a variety of facilities: shops, pubs, cafes, community hall, primary school with sports facilities, and a health clinic. There is a bus service that operates during the day, linking the area with Brecon and Llandovery <sup>1</sup> .
<b>MAC-4-6</b>	K LP1 Key Settlement Appropriate Development.	As suggested by the Inspector	2 <sup>nd</sup> Paragraph Amended as follows: "All proposals for development within Key Settlements must demonstrate how they respond to issues relevant to their location to the satisfaction of the NPA, and how the scheme will contribute to achieving the 15 Year Vision relevant to their location."	
<b>MAC-4-7</b>	K LP1 Key Settlement Appropriate Development.	Grammatical error and as suggested by the Inspector	Criteria 1 amended as follows: "Proposals that strengthen and enhance the mix of housing types and tenure options within the Town, responsive to the needs of the area, including provision of housing meeting Lifetimes Homes standards, on land identified as being within environmental limits".	
<b>MAC-4-8</b>	B LP1 Brecon Appropriate Development.	As suggested by the Inspector	Criteria 1 amended as follows: "Proposals that strengthen and enhance the mix of housing types and tenure options within the town, including provision of housing meeting Lifetimes Homes standards where appropriate, responsive to the demographic needs of the area and region, on land identified as being within environmental limits;"	
<b>MAC-4-9</b>	B LP1 Brecon Appropriate Development.	As suggested by the Inspector	Footnote added as follows (with regards to Criterion 1):  <sup>1</sup> All new housing units should be designed to Lifetime Homes standards where appropriate. Where an applicant considers that compliance with this may not be feasible, this should be clearly demonstrated in their Design and Access Statement.	
<b>MAC-4-10</b>	K LP1 Key Settlement Appropriate	Covered by other policies in the plan	Criterion 8 deleted.	

<sup>1</sup> 3-P-28

	Development.		
<b>MAC-4-11</b>	S LP2 Settlements Appropriate Development.	As suggested by the Inspector	2 <sup>nd</sup> paragraph amended as follows: “All proposals for development within Settlements must demonstrate how they respond to Settlement Issues and Objectives and how the scheme will contribute to achieving the Settlement 15 Year Vision.”
<b>MAC-4-12</b>	LGS LP2 Limited Growth Settlements Appropriate Development	As suggested by the Inspector	2nd paragraph amended as follows: “All proposals for development within Limited Growth Settlements must demonstrate how they respond to the Limited Growth Settlement Issues and Objectives and how the scheme will contribute to achieving the Limited Growth Settlement 15 Year Vision.”
<b>MAC-4-13</b>	LGS LP2 Limited Growth Settlements Appropriate Development	As suggested by the Inspector	Criteria 2 amended as follows: “Proposals that capitalise on improving existing building stock and/or utilise previously developed land and/or redundant buildings.”
<b>MAC-4-14</b>	CYD LP1 Enabling Appropriate Development	As suggested by the Inspector	All proposals for development within countryside locations must demonstrate how they respond to the identified issues set out at 3.12.2 and how the scheme will contribute to achieving the Countryside 15 year Future Vision.
<b>MAC-4-15</b>	S LP3 Mitigating Impact	As suggested by CCW	Paragraph B amended as follows: “Development proposals on allocated sites within Settlements classed as 3C will be required to demonstrate how the design and nature of the scheme has been developed in collaboration with the community through an appropriate and thorough process of engagement. A list of settlements with Village Plans which are being developed as SPG to aid implementation of this policy is set out in <i>Table 4.10 Settlement Constraints.</i> ”
<b>MAC-4-16</b>	B LP2 Mitigating Impact	As suggested by the Inspector for the avoidance of doubt	Final paragraph amended as follows:  All proposals for development will be required to demonstrate how these issues, as well as potential landscape impacts, have been addressed within the scheme to the satisfaction of the National Park Authority. Where necessary the National Park Authority will utilise planning conditions or Planning Obligations to ensure the provision of appropriate mitigation, compensation and/or enhancement measures within development proposals. (see also Policy 35 Planning Obligations)
<b>MAC-4-17</b>	K LP3 Mitigating Impact	As suggested by the Inspector for the avoidance of doubt	Final Paragraph amended as follows:  All proposals for development will be required to demonstrate how these issues (where relevant), as well as potential landscape impacts, have been addressed within the scheme to the satisfaction of the National Park Authority. Where necessary the National Park Authority will utilise Planning Conditions or Planning Obligations to ensure the provision of appropriate mitigation, compensation, and/or enhancement measures relating to development proposals. See also Policy 35.
<b>MAC-4-18</b>	S LP3	As suggested by	2 <sup>nd</sup> paragraph amended as follows:

	Mitigating Impact	the Inspector for the avoidance of doubt	All proposals for development will be required to demonstrate to the satisfaction of the National Park Authority how these issues (where relevant), as well as potential landscape impacts, have been addressed within the scheme, and where necessary the National Park Authority will utilise planning conditions or Planning Obligations to ensure the provision of appropriate mitigation, compensation or enhancement measures within development proposals.
<b>MAC-4-19</b>	LDS LP3 Mitigating Impact	As suggested by the Inspector for the avoidance of doubt	3 <sup>rd</sup> paragraph amended as follows:  All proposals for development will be required to demonstrate to the satisfaction of the National Park Authority how these issues (where relevant), as well as potential landscape impacts, have been addressed within the scheme and where necessary the National Park Authority will utilise planning conditions and/or Planning Obligations to ensure the provision of appropriate mitigation, compensation and enhancement measures within development proposals.
<b>MAC-4-20</b>	Policy K LP1 Key Settlement Appropriate Development	As suggested by the Inspector	Criterion 1 amended as follows:  1. Proposals that strengthen and enhance the mix of housing types and tenure options within the Town, responsive to the needs of the area, including provision of housing meeting Lifetime Homes standards where appropriate.
<b>MAC-4-21</b>	Policy K LP1 Key Settlement Appropriate Development – footnote	As suggested by the Inspector	Footnote added as follows (with regards to Criterion 1):  <sup>1</sup> All new housing units should be designed to Lifetime Homes standards where appropriate. Where an applicant considers that compliance with this may not be feasible, this should be clearly demonstrated in their Design and Access Statement.
<b>MAC-4-22</b>	S LP3	Suggested by the Inspector	Amend Policy S LP3 A to read  <i>A Development proposals in Settlements classed as 4B (from policy LGS LP 1)</i> Development proposals within settlements classed as 4B will be required to achieve at least national standards for sustainable design as set out in PPW and will be encouraged to achieve higher sustainable building standards within their design and environmental impact to mitigate for impacts relating to the sustainability of location. As such development proposals which results in either:  a) the creation of new dwellings, including the sub division of existing houses, changes of use, conversion of rural buildings or new build, where there is a net gain in housing; OR  b) The creation of new commercial space, including the sub division of existing buildings, changes of use, conversion of rural buildings or new build, where there is a net gain in commercial space will be required to aspire to reach the highest Standard for sustainable development appropriate to the scheme whilst maintaining viability. Evidence detailing sustainable design options tested and adopted will be required to be supplied within the Design and Access Statement in support of the proposal.

<b>MAC-4-23</b>	LGS LP3	Suggested by the Inspector	Amend Policy LGS LP3 A to read  <i>A Development proposals in Settlements classed as 4B (from policy LGS LP 1)</i> Development proposals within settlements classed as 4B will be required to achieve at least national standards for sustainable design as set out in PPW and will be encouraged to achieve higher sustainable building standards within their design and environmental impact to mitigate for impacts relating to the sustainability of location. As such development proposals which results in either:  a) the creation of new dwellings, including the sub division of existing houses, changes of use, conversion of rural buildings or new build, where there is a net gain in housing; OR  b) The creation of new commercial space, including the sub division of existing buildings, changes of use, conversion of rural buildings or new build, where there is a net gain in commercial space will be required to aspire to reach the highest Standard for sustainable development appropriate to the scheme whilst maintaining viability. Evidence detailing sustainable design options tested and adopted will be required to be supplied within the Design and Access Statement in support of the proposal.
<b>MAC-4-24</b>	New Para 4.9.3.4	Suggested by the Inspector	New para to read:  “Extensions to dwellings in the countryside will be limited in terms of their scale over and above the scale of the original dwelling. The original dwelling is defined for the purposes of this plan as the dwelling as existing on 1 <sup>st</sup> July 1948 if it was built before that date, and as it was built when built after that date.

### Chapter 5: Mitigating Impact in the Location of Growth

Change Number	AFC/Composite Plan Part	Reason	MAC
<b>MAC-5-1</b>	Paragraph 5.2	As suggested by the Inspector and EAW	Paragraph amended as follows:  Overcoming constraints identified from the planning application process may involve collaborative working with developers and key stakeholders to ensure that developments can be achieved without unacceptable adverse impact on the National Park and its communities. For ease of interpretation these area-wide issues have been categorised and defined in table 5.1 below. Key stakeholders with statutory interest in the area of constraint are identified for each issue.

## Chapter 6: Scale of Housing Provision

Change Number	AFC/Composite Plan Part	Reason	MAC																																
MAC-6-1	AFC-6-2 (Composite para 6.1.2)	As suggested by CCW	Paragraph amended as follows: “Recognising the statutory obligations set out in the Environment Act 1995 which defines the purposes and duty of the National Park Authority, the supply of housing to meet the identified requirement reflects the Environmental Capacity principles which underpin the whole plan and which are set out in section 2.4 (Composite Plan). The LDP therefore seeks to enable a level of development which is capable of being delivered without unacceptable impact on the purposes for which the National Park is designated, and its special qualities.”																																
MAC-6-2	AFC-6-8 (Composite para 6.1.7)  Insert new footnote	Updated information	<p>Paragraph amended as follows:</p> <p>“In meeting this requirement, the provision of land in Policy SP5 is comprised of the following elements<sup>1</sup>:-</p> <table border="1" data-bbox="833 571 2000 1091"> <thead> <tr> <th>Source</th> <th></th> <th>No. of Dwellings</th> <th>No. Affordable Dwellings</th> </tr> </thead> <tbody> <tr> <td>Completions</td> <td>2007 - 2012</td> <td>251</td> <td>67</td> </tr> <tr> <td>Under Construction</td> <td>1/4/2012</td> <td>66</td> <td>8</td> </tr> <tr> <td>Allocations</td> <td rowspan="5">2012-2022</td> <td>960</td> <td>230</td> </tr> <tr> <td>Commitments</td> <td>326</td> <td>73 (+£59K commuted sum)</td> </tr> <tr> <td>Small Sites</td> <td>220</td> <td>53</td> </tr> <tr> <td>Windfalls</td> <td>150</td> <td>30</td> </tr> <tr> <td>School Sites</td> <td>72</td> <td>14</td> </tr> <tr> <td><b>TOTAL</b></td> <td></td> <td><b>2,045</b></td> <td><b>475 (+£59k commuted sum)</b></td> </tr> </tbody> </table> <p><sup>1</sup>An extended version of this table showing the projected ‘Five Year Land Supply’ and ‘Flexibility Allowance’ can be found in the Appendices.</p>	Source		No. of Dwellings	No. Affordable Dwellings	Completions	2007 - 2012	251	67	Under Construction	1/4/2012	66	8	Allocations	2012-2022	960	230	Commitments	326	73 (+£59K commuted sum)	Small Sites	220	53	Windfalls	150	30	School Sites	72	14	<b>TOTAL</b>		<b>2,045</b>	<b>475 (+£59k commuted sum)</b>
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MAC-6-3	Policy SP5 Housing	Consequential change	<p>Policy wording amended as follows:</p> <p><b>SP5 Housing</b> The LDP has identified a supply of land to provide an estimated <b>2,045</b> dwellings over the LDP period. Land is allocated for <b>960</b> dwellings at the sites set out in Table 6.1 and as shown on the Proposals Map.</p>																																
MAC-6-4	AFC-6-13 (Table 6.1)	Updated information	Table 6.1 replaced by new table as follows:																																

	Settlement tier	Settlement	Site	Site Code	No. Dwellings	No. of Affordable Units	AH Contribution Target	
First 5 years	Primary Key Settlement	Brecon	Cwmfall dau Fields Extension	CS28	66	13	20%	
		Brecon	Opposite High School	CS132	30	6	20%	
	Key Settlements	Crickhowell	Land adjacent to Llangenny Lane	SALT 061	20	6	30%	
		Hay-on-Wye	Land opposite The Meadows	DBR-HOW-A	62	18	30%	
		Hay-on-Wye	Land adjoining Brecon Pharmaceuticals	SALT 059	5	2	30%	
		Talgarth	Proposed extension to T9	SALT 037	15	3	20%	
	Level 3 Settlements	Bwlch	Land adj Bwlch Woods	DBR-BCH-J	15	3	20%	
		Gilwern	Dan-y-Bryn and Lancaster Drive	CS102	112	34	30%	
		Libanus	Land adj Pen y Fan Close	DBR-LIB-E	3	>1	20%	
		Llanbedr	Land adj St Peter's Close	DBR-LBD-A	8	2	30%	
		Llanigon	Land opposite Llanigon County Primary School	DBR-LGN-D	10	3	30%	
		Llanspyddid	Land off Heol St Cattwg	DBR-LPD-A	10	2	20%	
		Pennorth	Land adj Ambelside	DBR-PNT-D	6	1	20%	
	Allocated brownfield site	Nearest Settlement - Glangrwyney	Former Army Camp, Cwrt-y-Gollen	CS 66	70	21	30%	
		<b>Total</b>				<b>432</b>	<b>114</b>	
Rest of LDP Period	Primary Key Settlement	Brecon	Slwch House Field	CS93	23	5	20%	
			Site located to the North of Camden Crescent	DBR-BR-A	38	8	20%	

				and East of Breconshire War Memorial					
				Site located to the North of Cradoc Close and West of Maen-du Well	DBR-BR-B	33	7	20%	
				Opposite High School	CS132	107	21	20%	
			Key Settlements	Crickhowell	Land above Televillage	DBR-CR-A	20	6	30%
				Defynnog	Glannau Senni	CS138	15	3	20%
				Hay-on-Wye	Land adj Fire Station	DBR-HOW-C	13	4	30%
			Level 3 Settlements	Cral	Land at Crai	CS42	9	2	20%
					Land SW of Gwalia	CS43	6	1	20%
				Govilon	Land at Ty Clyd	CS 39/69/70/88/89/99	93	28	30%
				Pencelli	Land South of Ty Melys	CS120	6	1	20%
				Pontsticill	Land at Penygarn	CS55	6	0	0%
					Land at end of Dan-y-Coed	DBR-PSTC-C	3	0	0%
					Land West of Pontsticill House	CS91	6	0	0%
				Talybont-on-Usk	Maesmawr Farm	CS127	57	11	20%
			Allocated brownfield site	Nearest Settlement – Talgarth	Former Mid Wales Hospital	CS 111	93	19	20%
				<b>Total</b>		<b>512</b>	<b>117</b>		
			<b>TOTAL</b>			<b>960</b>	<b>230</b>		
<b>MAC 6-5</b>	NEW TABLE 6.2 to go after AFC-6-13 (Table 6.1)	As requested by the Inspector	New table showing breakdown of housing supply by settlement level and development type						
			<b>Settlement</b>	<b>Completed **</b>	<b>Under Construction **</b>	<b>Commitments **</b>	<b>Allocations **</b>		
			Brecon	69 (3%)	38 (2%)	40 (2%)	297 (14%)		



TOTAL FOR BRECON	69 (3%)	38 (2%)	40 (2%)	297 (14%)
TOTAL BRECON CONTRIBUTION TO HOUSING SUPPLY	<b>444 (22%)</b>			
Crickhowell	24 (1%)	0	0	40 (2%)
Hay-on-Wye	21 (1%)	0	18 (<1%)	80 (4%)
Sennybridge/Defynnog	0	0	44 (2%)	15 (<1%)
Talgarth	0	0	53 (3%)	15 (<1%)
TOTAL FOR LEVEL 2 SETTLEMENTS	45 (2%)	0	115 (6%)	150 (7%)
TOTAL LEVEL 2 CONTRIBUTION TO HOUSING SUPPLY	<b>310 (15%)</b>			
Level 3 Settlements	5 (<1%)	17 (<1%)	91 (4%)	350 (17%)
TOTAL FOR LEVEL 3 SETTLEMENTS	5 (<1%)	17 (<1%)	91 (4%)	350 (17%)
TOTAL LEVEL 3 CONTRIBUTION TO HOUSING SUPPLY	<b>463 (23%)</b>			
Allocated brownfield site	0	0	0	163 (8%)
TOTAL FOR ALLOCATED BROWNFIELD SITE	0	0	0	163 (8%)
TOTAL ALLOCATED BROWNFIELD SITE CONTRIBUTION TO HOUSING SUPPLY	<b>163 (8%)</b>			
Level 4 Settlements	21 (1%)	2 (<1%)	48 (2%)	0
TOTAL FOR LEVEL 4 SETTLEMENTS	21 (1%)	2 (<1%)	48 (2%)	0
TOTAL LEVEL 4 CONTRIBUTION TO HOUSING SUPPLY	<b>71 (3%)</b>			
Open Countryside	1 (<1%)	9 (<1%)	32 (2%)	0
TOTAL FOR OPEN COUNTRYSIDE	1 (<1%)	9 (<1%)	32 (2%)	0
TOTAL OPEN COUNTRYSIDE	<b>41 (2%)</b>			

CONTRIBUTION TO HOUSING SUPPLY				
<b>TOTAL</b>	<b>141 (7%)</b>	<b>66 (3%)</b>	<b>326 (16%)</b>	<b>960 (47%)</b>

\*PLEASE NOTE this table does not include small sites, windfalls or school sites  
\*\*Housing Supply figure of 2,045 used

<b>MAC-6-6</b>	Paragraph 6.2.3.5 (footnote)	As suggested by the inspector	Footnote amended as follows:  Planning Policy Wales (para 9.3.6)
<b>MAC-6-7</b>	Paragraph 6.3.1.4	As a result of MAC-6-5 above.	Paragraph amended as follows:  “Through the formulation of the Spatial Strategy the NPA have considered how the LDP can best contribute to meeting the need identified. The NPA and its partners recognise that the delivery of affordable housing through the LDP is only one method of delivering affordable housing. It is also recognised that the LDP is not responsible for delivering the total level of need identified. The NPA recognise that the delivery of this strategy is dependent on partnership working with neighbouring Unitary Authorities, the Rural Housing Enablers and other key organisations.  The strategy of this plan is to maximise all opportunities to contribute to affordable housing delivery that arise through the granting of planning permission. There are 3 ways in which this LDP can contribute to the provision of affordable homes:  <ul style="list-style-type: none"> <li>i) Enabling the release of land for general needs housing in the Primary Key Settlement, Key Settlements, Level 3 Settlements and the two allocated brownfield sites at the Former Army Camp, Cwrt-y-Gollen and the Former Mid Wales Hospital and requiring a contribution to affordable housing in all proposals for development which results in the creation of new dwellings. New dwellings includes the sub division of existing houses, changes of use, conversion of rural buildings, or new build, where there is a net gain in housing to contribute to the provision of affordable housing. (Policy 13)</li> <li>ii) Enabling Affordable Housing Exceptions Sites (Policy 14); and</li> <li>iii) In Limited Growth Settlements (Policies LGS LP 1 and LGS LP 2) and Countryside (Policy CYD LP1) allowing Affordable Housing only.”</li> </ul>
<b>MAC-6-8</b>	Paragraph 6.3.2.1	As suggested by the Inspector	Additional paragraph inserted immediately following 6.3.2.1:  <b>Mix and Tenure</b> The mix and tenure of affordable housing schemes will be commensurate with the needs identified in the local area. The NPA through the LDP is seeking to address the most acute identified local housing need whilst striving to achieve balanced, inclusive and sustainable communities. Affordable housing units will generally be tenure neutral to

			‘facilitate flexibility between tenures of owner occupation and renting. Tenure neutral housing can take the form of social or intermediate rent or shared equity/ownership at any given point in time.’ Tenure neutral properties enable flexibility both within the affordable housing stock and for individual occupiers.
<b>MAC-6-9</b>	Paragraph 6.3.7	Following Final Hearing Session	Paragraph amended as follows:  <b>Affordable Housing Contribution Target</b> The NPA estimate that this LDP will provide for a total of 475 affordable homes through the implementation of Policy 13 over the plan period. The NPA estimate that 230 affordable homes will be provided from sites allocated in the LDP (set out in Tables 6.1 and 6.2). A further 245 units are estimated to be provided from non-allocated sites.
<b>MAC-6-10</b>	Policy SP6 Affordable Housing	As a result of MAC-6-5 above.	Policy SP6 Affordable Housing amended as follows:  “The LDP will enable the provision of Affordable Housing by:- i) Affordable Housing Contributions Requiring all proposals within Primary Key Settlement, Key Settlements, Level 3 Settlements and the two allocated brownfield sites at the Former Army Camp, Cwrt-y-Gollen and the Former Mid Wales Hospital for development which results in a net gain in housing to make an Affordable Housing contribution (Policy 13) This will enable the provision of an estimated <b>475</b> Affordable Housing units. ii) Affordable Housing Exception Sites Exceptionally allowing residential development on sites outside the designated development boundaries of settlements (Policy 14)”
<b>MAC-6-11</b>	Paragraph 6.3.8.1	Following Final Hearing Session	Paragraph amended as follows:  Applicants will be required to make Affordable Housing Contributions for all proposals for development on sites located in the “Primary Key Settlement”, “Key Settlements”, “Settlements” and the two allocated brownfield sites at the Former Army Camp, Cwrt-y-Gollen and the Former Mid Wales Hospital which results in the creation of new dwellings intended for sale or rent on the open market, including the subdivision of existing houses, changes of use, conversion of rural buildings, or new build, where there is a net gain in housing.
<b>MAC-6-12</b>	Paragraph 6.3.9.3	As suggested by the Inspector	Paragraph amended as follows:  Where the contribution is on site, the onus is on the developer to contact the relevant Unitary Authority Housing Strategy Officer in order to establish the nature of provision required in terms mix and size and tenure.
<b>MAC-6-13</b>	Policy 13 Affordable Housing Contributions	As suggested by the Inspector	Policy amended as follows:  “The NPA require all proposals within the Primary Key Settlement, Key Settlements, Level 3 Settlements (except for those in Heads of the Valleys and Rural South submarket) and the two allocated brownfield sites at the Former Army Camp, Cwrt-y-Gollen and the Former Mid Wales Hospital for development that would results in the net creation of new dwellings for sale or rent on the open market, (including the sub division of existing houses, changes of use, conversion of rural buildings, or new build, where there is a net gain in dwellings), to make an affordable housing contribution.

			<p>The contribution will be either through on site provision, a commuted sum or a mix of both mechanisms. However, commuted sums will only be acceptable in exceptional circumstances (where it can be demonstrated that on-site provision is not appropriate in order to accord with Technical Advice Note 2).</p> <p>The level of contributions required will be in accordance with the following targets</p> <p>Abergavenny, Hay and Crickhowell submarket: 30% affordable</p> <p>Brecon, Carmarthenshire and Rural Hinterland submarket: 20% affordable</p> <p>Heads of the Valleys and Rural South submarket: 0%</p> <p>The NPA will adopt a robust but flexible approach to the contribution requested which will be linked to market conditions and their impact on site viability.</p> <p>The nature and level of contribution will be determined in accordance with an assessment process set out in Supplementary Planning Guidance which aids the implementation of this policy.”</p>
<b>MAC-6-14</b>	Policy 14 Enabling Affordable Housing outside Settlement Boundaries.	As suggested by the Inspector to accord with PPW.	<p>Policy title amended as follows:</p> <p>“Enabling Affordable Housing Exception Sites”</p>
<b>MAC-6-15</b>	Section 6.4 Local Needs	As suggested by Inspector	Section 6.4 to be deleted.
<b>MAC-6-16</b>	AFC-6-17	As suggested by the Inspector	<p>Paragraph 6.5.5 amended as follows:</p> <p>The NPA will support proposals which are located within or, as an exception to normal planning policies, adjacent to a defined settlement.</p>
<b>MAC-6-17</b>	AFC-6-18 (Policy 16 Sites for Gypsies and Travellers)	As suggested by the Inspector	<p>Policy Amended as follows:</p> <p>“Gypsy and Travellers’ caravan sites will be permitted where:</p> <p>a) the proposed development will not adversely affect wildlife, habitats, landforms, archaeological and cultural features;</p> <p>b) the proposed site will not adversely affect the character, amenity and natural beauty of the National Park and shall be adequately screened. Any buildings required to facilitate the use (such as amenity buildings and site offices) shall be designed in appropriate local materials;</p>

			<p>c) the proposed site will be provided with a satisfactory level of services; and</p> <p>d) the proposed site will have an adequate means of access, and traffic to or from the site will not adversely affect highway safety.”</p>
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### Chapter 7: Economic Wellbeing

Change Number	AFC/Composite Plan Part	Reason	MAC
<b>MAC-7-1</b>	Policy SP12 Economic Wellbeing	Following Final Hearing Session	<p>Policy wording amended as follows:</p> <p><b>SP12 Economic Wellbeing</b> Development proposals which are aimed at improving the economic social well-being of the National Park’s communities will be permitted where they:</p> <p>are located in areas which minimise the need to travel or are well connected to areas of residential population through sustainable forms of transport; and</p> <p>a) provide employment opportunities within Primary and-Key Settlements appropriate to the form and character of the settlement and landscape setting (see Policy 17); or</p> <p>b) support proposals for sustainable tourism (see Policy SP14); or</p> <p>c) support rural enterprise and the agricultural sector, both directly and through farm diversification (See Policy 20); or</p> <p>d) support town centres, and/or rural and farm shops (see Policy SP13); or</p> <p>e) provide employment opportunities within green services, including appropriately scaled renewable energy generation and carbon minimisation schemes (See Policy SP9); or</p> <p>f) where they occur on allocated mixed use sites that require a development brief</p>
<b>MAC-7-2</b>	Policy 26 Neighbourhood, Village and Rural Shops	As suggested by the Inspector	<p>Policy wording amended as follows:</p> <p>“The change of use of village shops and public houses in the Key Settlement of Sennybridge and Defynnog, Level 3 Settlements and Level 4 Limited Growth Settlements will only be permitted where it can be demonstrated that:</p> <p>a) there is no detrimental impact on the local community</p> <p>b) a robust assessment of the viability of the shop as a commercial business, including its marketability, has been undertaken; and</p> <p>c) the assessment demonstrates that the use of the shop or the public house cannot be viably sustained and consideration has been given to continuing the commercial element as ancillary to another use.”</p>
<b>MAC-7-3</b>	Paragraph 7.7.6.1	As a result of MAC-7-1 above	<p>Paragraph amended as follows:</p> <p>“The NPA recognise that outside of the Retail Centres identified in Policy 24, local retail facilities play an</p>

			essential role in the sustainability of local communities. Policy 26 seeks to ensure the retention of local retail facilities outside of the Level 1 and Level 2 Settlements (with the exception of Sennybridge and Defynnog) where they provide an essential service to the local community, and are economically viable.”															
<b>MAC-7-4</b>	AFC-7-21 - Policy 18 Protection of Employment Sites and Buildings	As suggested by the Inspector	Criterion c) wording amended as follows:  “The potential for continued use of the site or premises for employment use has been fully considered through the continued marketing of the site at reasonable market levels for a continuous period of at least 12 months immediately prior to the submission of the application.”															
<b>MAC-7-5</b>	Paragraph 7.5.2.1	As suggested by the Inspector	Paragraph wording amended as follows:  “In consideration of the “other Planning Requirements Test” (as set out in TAN 6) for new Rural Enterprise Dwellings, the NPA will require the applicant to demonstrate that <ul style="list-style-type: none"> <li>• the siting of the dwelling has been considered to ensure no adverse impact on the wildlife, natural beauty or cultural heritage of the National Park</li> <li>• The design has been formulated to maximise resource efficiency</li> <li>• The proposal can be appropriately serviced without adverse impact on the National Park environment.</li> </ul>															
<b>MAC-7-6</b>	Policy SP13 Retail Strategy	As suggested by the Inspector	Criterion a) wording amended as follows:  “Safeguarding existing retail uses in the Retail Centres;”															
<b>MAC-7-7</b>	New Policy 24 Development in Retail Centres	Wording error (grammatical)	Criterion a) wording amended as follows:  “changes of use to A1 retail units from Use Classes A2, A3, B1, C1, D1 or D2 of the Use Classes Order or to a “sui generis” use that would normally be found in a Retail Centre;”															
<b>MAC-7-8</b>	Paragraph 7.2.11 Employment Allocations	Consequential change	The sites set out in [New Table 7.1b] have been allocated for employment. Proposals for employment will be considered against Policy 17, the relevant spatial policies for the settlement in which they occur and all other relevant LDP policy.															
<b>MAC-7-9</b>	AFC-7-12 Section 7.2 Table 7.1b	Further to additional evidence	Table 7.1b amended as follows: <table border="1" data-bbox="936 1209 1915 1527"> <thead> <tr> <th>Site Code</th> <th>Site Name</th> <th>Notes</th> <th>Settlement</th> <th>Size (ha)</th> </tr> </thead> <tbody> <tr> <td>DBR-BR-E1</td> <td>Land at Brecon Enterprise Park</td> <td>This is the last remaining undeveloped plot on the existing Enterprise Park.</td> <td>Brecon</td> <td>0.8</td> </tr> <tr> <td>CS132</td> <td>UDP allocation B17 Opposite High School,</td> <td></td> <td>Brecon</td> <td>0.5</td> </tr> </tbody> </table>	Site Code	Site Name	Notes	Settlement	Size (ha)	DBR-BR-E1	Land at Brecon Enterprise Park	This is the last remaining undeveloped plot on the existing Enterprise Park.	Brecon	0.8	CS132	UDP allocation B17 Opposite High School,		Brecon	0.5
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CS132	UDP allocation B17 Opposite High School,		Brecon	0.5														

					North of Hospital (Mixed Use site of which 0.5ha is allocated for employment)			
				CS26	Land adjacent to Hay Road		Talgarth	0.6
				CS111	Former Mid Wales Hospital (Mixed Use site of which 3500sqm (floorspace) is allocated for employment)		Allocated brownfield site (use to be B1 or D2)	3,500 sqm
				CS66	Former Army Camp, Cwrt-y-Gollen (Mixed Use site of which 1.4ha is allocated for employment),		Allocated brownfield site	1.4
				<b>Total</b>				<b>3.3 (+3,500sqm floorspace at Mid Wales Hospital)</b>
				<b>COMMITMENT</b>				
				CS78	Land adjacent to 5 <sup>th</sup> Avenue, Hirwaun Industrial Estate	Whilst the settlement of Hirwaun within Rhondda Cynon Taff CBC area, part of the Hirwaun Industrial Estate is located within the National Park boundary. The vacant part of the site within the National Park boundary is allocated as employment in order	Hirwaun	5

			<table border="1"> <tr> <td></td> <td></td> <td>to ensure that the use remains consistent over the boundary.</td> <td></td> <td></td> </tr> </table>			to ensure that the use remains consistent over the boundary.													
		to ensure that the use remains consistent over the boundary.																	
<b>MAC-7-10</b>	Policy 66 Employment Sites	Following Final Hearing Session	<p>Policy wording amended as follows:</p> <p><b>Policy 66 Employment Sites</b></p> <p>The sites set out in Table 7.1 are allocated for employment use (B1, B2, or B8). The allocations are shown on the Proposals Map.</p>																
<b>MAC-7-11</b>	Paragraph 7.2.12	Following Final Hearing Session	<p>Paragraph amended as follows</p> <p>For all mixed use allocations, developers will be expected to produce and agree a development brief for the site with the NPA prior to the submission of any planning application. Proposals on mixed use sites will be required to come forward as a whole scheme and to demonstrate the appropriate mix of uses and the efficient use of the whole site. Development briefs and proposals for mixed use sites will be considered against the relevant spatial policies for the settlement in which they occur.</p>																
<b>MAC-7-12</b>	Policy 67 Mixed Use Allocations	Following Final Hearing Session	<p>Policy wording amended as follows:</p> <p><b>Policy 67 Mixed Use Allocations</b></p> <p>The sites set out in Table 7.2 are allocated for mixed use. The allocations are shown on the Proposals Map.</p>																
<b>MAC-7-13</b>	AFC-7-13 Section 7.2 Table 7.1	Further to additional evidence	<p>Table amended as follows:</p> <table border="1"> <thead> <tr> <th>Site Code</th> <th>Site Name</th> <th>Settlement</th> <th>Size</th> </tr> </thead> <tbody> <tr> <td>CS132</td> <td>UDP allocation B17 Opposite High School, North of Hospital (site allocated for housing (4.55ha) and employment (0.5ha))</td> <td>Brecon</td> <td>5.05</td> </tr> <tr> <td>SALT 037</td> <td>Proposed extension to T9 (allocated for housing (0.5ha) and new primary school (1.56ha))</td> <td>Talgarth</td> <td>2.06</td> </tr> <tr> <td>CS66</td> <td>Former Army Camp, Cwrt-y-Gollen (site allocated for housing (3.7ha), employment (1.84ha), remainder to</td> <td>Allocated Brownfield</td> <td>24.4</td> </tr> </tbody> </table>	Site Code	Site Name	Settlement	Size	CS132	UDP allocation B17 Opposite High School, North of Hospital (site allocated for housing (4.55ha) and employment (0.5ha))	Brecon	5.05	SALT 037	Proposed extension to T9 (allocated for housing (0.5ha) and new primary school (1.56ha))	Talgarth	2.06	CS66	Former Army Camp, Cwrt-y-Gollen (site allocated for housing (3.7ha), employment (1.84ha), remainder to	Allocated Brownfield	24.4
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				comprise of community facilities and open space provision)	Site	
			CS111	Former Mid Wales Hospital (allocated for housing, employment and community use)	Allocated Brownfield Site	13.6
			<b>TOTAL</b>			<b>45.11</b>
<b>MAC-7-14</b>	AFC-7-16, AFC-7-17 Section 7.2 and 7.3 Policies 17 and 19	As suggested by the Inspector	<p>Policies 17 and 19 deleted and then merged as follows:</p> <p><b>Policy 17</b> <b>Employment Generating Development</b></p> <p>B Use Class employment generating developments including new live/work proposals will be permitted where they are located on ;</p> <ul style="list-style-type: none"> <li>a) allocated employment sites; or</li> <li>b) allocated mixed use sites; or</li> <li>c) existing industrial estates or business parks or</li> <li>d) are within or adjacent to the boundaries of settlements where it has been demonstrated to the satisfaction of the NPA that no suitable allocated or existing employment site is available or</li> <li>e) are within the curtilages of dwellings in the countryside and</li> <li>f) the scale of the proposal is appropriate to its location and</li> <li>g) the nature and location of the proposal will not have an unacceptable adverse impact on the amenity of the surrounding area; and</li> <li>h) adequate access can be provided to service the development without adverse impact on the existing highways network; and</li> <li>i) the proposal will not have an adverse impact on the natural beauty, wildlife, cultural heritage or environmental resources of the National Park.</li> </ul>			
<b>MAC-7-15</b>	Paragraph 7.2.16	Further to discussion at Hearing Session 4	<p>Paragraph amended as follows:</p> <p>Planning Policy Wales sets out clear statements of national development control policy on employment developments in rural areas. Please refer to Chapter 7 ‘Supporting the Economy’. The NPA recognises however that small scale enterprises and businesses play a key role in maintaining a vibrant economy in rural areas and contribute to maintaining and enhancing community sustainability. The NPA will support the development of new businesses and the expansion of existing enterprises where the proposals are appropriate in scale and location.</p>			
<b>MAC-7-16</b>	Immediately following Paragraph 7.2.16	Further to discussion at Hearing Session 4	<p>New Policy to be inserted as follows:</p> <p><b>Policy-19</b> <b>Enabling B Use Class Employment Use outside Settlement Boundaries and Settlement Extents</b></p> <p>Exceptionally, development for B1, B2 or B8 employment uses will be permitted on sites adjoining and</p>			

			<p>forming a logical extension to appropriate settlements to meet a proven need that cannot be met in any other way. Permission will be granted where;</p> <ol style="list-style-type: none"> <li>An established business demonstrates to the satisfaction of the NPA that it cannot expand on its existing site and there are no other suitable sites available within the settlement and;</li> <li>The scale of the proposal is appropriate to its location; and</li> <li>The nature and location of the proposal will not have an unacceptable adverse impact on the amenity of the surrounding area; and</li> <li>Adequate access can be provided to service the development without adverse impact on the existing highways network; and</li> <li>The proposal will not have an adverse impact on the natural beauty, wildlife, cultural heritage or environmental resources of the National Park.</li> </ol>
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### Chapter 8: Provision of Services and Facilities

Change Number	AFC/Composite Plan Part	Reason	MAC
MAC-8-1	Policy 33 Development of New or Extended Community Facilities	As suggested by the Inspector	<p>1<sup>st</sup> paragraph of policy amended as follows:</p> <p>“Proposals for new, or extensions to existing, schools, village halls, theatres and other community facilities such as community recreation or sports facilities, will be permitted where:...”</p>
MAC-8-2	Policy 35 Planning Obligations	In the interest of clarity	<p>Policy wording amended as follows:</p> <p>The NPA will, where necessary require developers to enter into Planning Obligations, or to contribute via the Community Infrastructure Levy <sup>1</sup> to ensure that no adverse effect or unacceptable harm will come to the special qualities natural beauty, wildlife, and cultural heritage of the National Park and/or the socio-economic well-being of our communities as a result of new development.</p> <p>Footnote: 1. There is no CIL charge in the National Park at present.</p>
MAC-8-3	Policy 37 Telecommunications	As suggested by the Inspector	<p>Criterion c) wording amended as follows:</p> <p>“the development does not have an unacceptable adverse impact on the wildlife, natural beauty, cultural heritage or environmental resources of the National Park...”</p>
MAC-8-4	Policy 38 Sustainable Drainage Systems	As suggested by the Inspector	<p>Policy wording amended as follows:</p> <p>“All proposals for new development will be required to consider the incorporation of appropriate Sustainable Drainage Systems. Where relevant it must be demonstrated that the SUDS proposed within the development and procedures for adoption and maintenance have been approved by the relevant drainage</p>

			body. This will be tied by a condition and/or S106 arrangement where necessary.”
MAC-8-5	Paragraph 8.10.1	As suggested by the Inspector.	Paragraph amended as follows:  The NPA will require all future development to contribute in some way to the creation of a sustainable transport network serving our towns and settlements. Proposals which actively contribute to the physical infrastructure through the provision of cycle or pedestrianised walkways and horse riding routes/bridleways will be encourage either in isolation or as part of a wider development scheme. In all instances protection of NP special qualities and environmental capital will be necessary, but the general presumption is towards enabling such proposals. Proposals will be judged in accordance with Policy 40 set out below.
MAC-8-6	Section 8.3	As suggested by the Inspector	New paragraph to be inserted immediately following “8.3 Planning Obligations” as follows:  The Authority will consider the most appropriate method to collect a contribution to community and infrastructure projects taking into account national legislation and regulations. The mechanism by which developers’ contributions are achieved will be reviewed in the light of changes in national policy.
MAC-8-7	Paragraph 8.4.0.3	As suggested by the Inspector	Paragraph amended as follows:  Strategic Policy SP16 relates to the provision of infrastructure to meet the needs of the National Park’s resident communities. Where a scheme proposed within the National Park is more national than local in character then such developments will be considered against Policy SP1 and Policy SP2 (for information on ‘Requirements of Development’ for allocated sites, see Appendix 2).
MAC-8-8	Paragraph 8.3.2 (footnote)	As suggested by the Inspector	Footnote amended as follows:  PPW Section 4.7
MAC-8-9	Paragraph 8.3.2	As suggested by the Inspector	Paragraph amended as follows:  Planning Obligations are secured using agreements and/or unilateral undertakings under Section 106 of the Town and Country Planning Act 1990 (as amended). Planning Obligations are usually benefits that may be in kind or take the form of financial contributions. Section 106 Agreements are legally binding agreements that, in the absence of suitable planning condition, ensure that a development is acceptable in land use planning terms. Planning Obligations are sought on a case-by-case basis and are generally used to secure developer contributions which will offset negative consequences of development, help meet local needs (including Affordable Housing) and secure benefits to make development more sustainable.
MAC-8-10	Paragraph 8.3.4	As suggested by the Inspector	Paragraph amended as follows:  The NPA’s Planning Obligation Strategy is derived from the National Park’s Statutory Purposes and the strategic vision for sustainable development in accordance with the aims and strategy of the LDP. This is the guiding framework that has determined the NPA’s approach towards seeking Planning Obligations, and indeed the type of contributions appropriate within the National Park. It will be updated to form Supplementary Planning Guidance upon adoption of the LDP.

<b>MAC-8-11</b>	Paragraph 8.6.3.2	As suggested by the Inspector	Paragraph amended as follows:  When assessing the effects of proposals for all forms of non-mains drainage applicants should have regard to the requirements of Circular 10/99 – Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.
<b>MAC-8-12</b>	Paragraph 8.1.0.4	As suggested by the Inspector	New paragraph to be inserted immediately after 8.1.0.4 stating the following:  Where an alternative use is proposed, it must be clearly demonstrated as part of an accompanying Design and Access Statement that the community facility is no longer required. This will be assessed on a case-by-case basis in consultation with the relevant public bodies.
<b>MAC-8-13</b>	Paragraph 8.13.3	As suggested by the Inspector	Paragraph 8.13.3 deleted.

### Chapter 9: Waste

Change Number	AFC/Composite Plan Part	Reason	MAC
<b>MAC-9-1</b>	Paragraph 9.1.6	In the interest of clarity.	Paragraph amended as follows:  “Specific requirements for these facilities have not been identified and future proposals will be considered at the employment sites listed below, assessed against relevant criteria based policies;  <ol style="list-style-type: none"> <li>1. BREC 1 Brecon Enterprise Park</li> <li>2. Brec 2 Ffrwdgrech Industrial Estate</li> <li>3. Crick 1 Elvicta Business Park</li> <li>4. Crick 2 Granada Park</li> <li>5. GIL 1 Gilwern Park Industrial Estate”</li> </ol>
<b>MAC-9-2</b>	Policy 42 Local Waste Management Facilities	In the interest of clarity.	Policy wording amended as follows:  “Local waste management and recycling facilities which serve the National Park area will be permitted provided: <ol style="list-style-type: none"> <li>a) the site would be conveniently located in relation to the needs of the National Park community; or</li> <li>b) they are located at existing waste management sites or B2 industrial units; and</li> <li>c) the proposal makes provision for adequate screening so as to minimise any adverse effects; and</li> <li>d) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and</li> <li>e) the development will not cause demonstrable harm to the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, litter, odour nor adversely affect existing surface and groundwater resources.”</li> </ol>

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## Chapter 10: Sustainable Use of Minerals Resources

Change Number	AFC/Composite Plan Part	Reason	MAC
<b>MAC-10-1</b>	Policy 45 Minerals Safeguarding	As suggested by the Inspector	<p>Policy wording amended as follows:</p> <p>Reserves of sand and gravel, limestone and sandstone will be safeguarded as shown on the Proposals Map.</p> <p>Extraction of minerals before development that would otherwise sterilise mineral resources of current or likely future economic importance will be required, provided there is no suitable alternative location and an overriding need for the development (in line with Policy SP2), and extraction can be achieved:</p> <ul style="list-style-type: none"> <li>a) without prejudicing the proposed development;</li> <li>b) by completing the extraction within a reasonable timescale;</li> <li>c) without unacceptable environmental impacts.</li> </ul>
MAC-10-2	Paragraph 10.2.5	Superfluous	Paragraph deleted.
<b>MAC-10-3</b>	Paragraph 10.7.2	As suggested by the Inspector	<p>Paragraph amended as follows:</p> <p>The Authority will investigate the appropriateness of making Prohibition Orders on a case by case basis and consider factors such as the scale of the operation and past levels of production. In deciding whether or not the resumption of working is unlikely, the NPA will contact the operators/owners on the pattern and programme of their operations including forecasts of trends in production and markets for their products; the quality and quantity of workable mineral and whether there is a real and genuine intention to work the site. In the light of such factors and all other material considerations the NPA will need to demonstrate that its decision to make a Prohibition Order is a reasonable one.</p>

## Chapter 11: Monitoring

**MAC-11-1: The previous Monitoring Framework has been deleted and replaced with the following:**

### Monitoring and Review

To effectively assess the ability of the plan to implement its policies, the plan will be subject to review every 4 years. This provides the opportunity to review the progress in implementing the policies and make modifications where appropriate.

The National Park is required by the Welsh Government to produce an Annual Monitoring Report (AMR) to be submitted to the Welsh Government by 31st October each year following the adoption of the LDP.

The report is fundamental in assessing the progress of the LDP in implementing the policies contained within the plan and will allow the National Park the opportunity to assess the Policies against the most up-to-date information available. It will also include the results of the SEA/SA monitoring, monitoring of associated plans and documents including the Community Strategy and identifying potential areas of change during the 4 year reviews.

The monitoring exercise can assist the National Park to:-

- Identify where certain policies are not being successful in delivering their intended objective;
- Identify gaps in the evidence base, perhaps through a change in the economy, which need to be addressed and reflected in the LDP;
- Identify areas of success which could be used as an example for change throughout the LDP;
- State the intended actions that the National Park will take in rectifying any issues to ensure the successful implementation of the policy or any revision that needs to take place.

The National Park has constructed a set of targets and indicators which act as a benchmark against which performance can be measured. Targets may relate to the achievement of certain levels of development and may be set annually or at an interim point within the plan period. The target for the whole of the plan is to achieve the implementation of the LDP Strategy.

### **Core Indicators**

LDP Regulation 37 prescribes two core indicators which must be included in the Annual Monitoring Report:

- the housing land supply taken from the current Housing Land Availability Study;
- the number of net additional affordable and general market dwellings built in the LPA's area;

Other suggested output indicators are laid out in national planning policy.

### **Trigger Points**

The indicators and targets below also give trigger points to indicate if one part of the plan is not achieving the desired outcomes. If these triggers are 'activated' then the AMR will consider the necessary action which is required as a result. There are a number of outcomes which could be actioned by the National Park in this event; these will depend on both the level to which the target appears not to have been met and the criticalness of the development to the achievement of the LDP Strategy. Contextual indicators will also be used in the AMR to evaluate if it is

actually the Plan which is not achieving the targets or if there are external factors (such as the economy or changes in funding sources etc.) which are contributing in this respect and therefore outside of the planning systems control.

The following options are available to the National Park in association with each of the indicators and their triggers. The AMR will assess the severity of the situation associated with each indicator and recommend an appropriate response.

<b>Continue Monitoring</b>
Where indicators are suggesting that LDP policies are being implemented effectively and there is no cause for a review.
<b>Officer / Member Training Required</b>
Where indicators associated with planning applications suggest that policies are not being implemented as they were intended and further officer or Member training is required.
<b>Supplementary Planning Guidance (SPG) / Development Briefs Required</b>
Whilst the National Park will be preparing SPG and Development Briefs throughout the Plan period, indicators may suggest that further guidance should be provided to developers on how a policy should be properly interpreted. Additionally, should sites not be coming forward as envisaged; the National Park will actively engage with developers / landowners to bring forward Development Briefs on key sites to help commence the development process.
<b>Policy Research</b>
Where the indicators suggest that the LDP policies are not being effective as they should; further research and investigation, including the use of contextual indicators and comparisons with other local authorities and national statistics where appropriate may be required.
<b>Policy Review</b>
Where indicators suggest that a LDP policy is failing to implement the strategy of the Plan and a formal review of the policy is required. Further research and investigation, including comparisons with other local authorities and national statistics where appropriate will be required before a decision to formally review the policy is made.
<b>Plan / Strategy Review</b>
Where indicators suggest that the LDP strategy is failing and a formal review of the Plan is required. The decision to review the Plan will not be taken lightly, and this trigger will not apply to the majority of policy areas.

The monitoring indicators are categorised below by strategic objective and policy theme and are linked to relevant LDP objectives and strategic policies.

## **Site Monitoring**

As part of the AMR process, the National Park will also include an update on the development of allocated sites. This will highlight what activity has taken place on the site in any given year including the preparation of studies or the progression of development. If a site is not being progressed as anticipated, this will be interpreted as a trigger and appropriate action (see above) will be taken by the National Park if needed.



## Spatial Strategy

**Primary Policy:** SP10

**Other Policies:** BLP1, BLP2, K LP1, K LP2, K LP3, S LP1, S LP2, S LP3, LGS LP1, LGS LP2, LGS LP3

**LDP Objectives:** SQ2

**Monitoring Aim:** To ensure that the spatial strategy continues to provide sustainable development options for our communities for the lifetime of the plan

**Monitoring to be undertaken in support of LDP scheduled Review (4 yearly)**

Policy Target	Indicator	Annual/Interim Monitoring Target	Assessment Trigger
Sustainability Index	To monitor changes in role and function of settlements throughout the lifetime of the Local Development Plan	Possible change in the definition of sustainability of some settlements	Settlements with significant change in sustainability definition should be reassessed against the Settlement Assessment Matrix. Any resulting changes in settlement position within hierarchy should be proposed as amendments within scheduled review of LDP.

## Environmental Protection

**Primary Policy:** Strategic Policies: SP1 and SP2

**Other Policies:** SE8, SP3, **PX (NEW POLICY), PX (Demolition of LB), PX (Setting), PX (Conservation Areas), PX(Historic Parks & Gardens), PX (Historical landscapes)**

**LDP Objectives:** SQ1, SQ2, SQ4, SQ5, SQ6, SQ7, SQ8 and SQ10

**Monitoring Aim:** To protect sites and buildings of acknowledged natural, built and historic interest

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
To ensure no inappropriate development takes place in the countryside of the National Park	Amount land in the countryside (ha) lost to development which is permitted by way of a departure application to Policy CYD LP1	No land in the countryside lost to development which is permitted by way of departure applications to Policy CYD LP1	> 0 ha of land in the countryside lost to development which is permitted as a departure application to Policy CYD LP1 in any year.
To ensure no development will take place which adversely affects the integrity and coherence of Historic Landscape Designations	Amount of development with an impact on Historic Landscape Designations	No development will take place which adversely affects the integrity and coherence of Historic Landscape Designations.	1 or more planning permissions granted contrary to advice from CADW, NRW or the Authority's Conservation Officer
To ensure the protection of designated sites for nature conservation including European Sites	Amount of development with adverse effect on the integrity of designated sites for nature conservation including European Sites	No planning permissions approved contrary to the advice of NRW	1 or more planning permissions granted contrary to the advice of NRW and NPA ecologist
Development proposals do not adversely impact upon buildings and areas of built or historical interest.	Occasions when development permitted would have an adverse impact on a Listed Building; Conservation Area; Site / Area	No planning consents are issued where there is an outstanding objection from the Authority's Conservation team,	1 or more planning consents are issued where there is an outstanding objection from the Authority's Conservation team,

	of Archaeological Significance; or Historic Landscape, Park and Garden.	CADW or the Welsh Archaeological Trusts  Production of Built Heritage Strategy SPG by the end of 2017.	CADW or the Welsh Archaeological Trusts  Built Heritage Strategy SPG is not in place by end of 2017.
Development proposals do not adversely impact upon buildings and areas of built or historical interest.	Number of Conservation Areas with up to date Area Assessments	Complete Conservation Area Assessments by 2017 and review every 5 years	Conservation Area Assessments by 2017 and review every 5 years not completed
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG on Light Pollution	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Revision and adoption of SPG on Best Practice in Biodiversity and Geodiversity Conservation in the Planning and Development Sectors.	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG – The Biodiversity Audit Project 2012. <i>Biodiversity Audit of Brecon, Crickhowell, Talgarth and Hay-on Wye.</i>	By end of 2014	
No development will take place which results in detriment to the favourable conservation status of EU protected species, or significant harms to species protected by other statute	Amount of development with an impact on EU protected species or species protected by other statute	No development will take place which results in detriment to the favourable conservation status of EU protected species or species protected by other statute	1 or more applications granted contrary to the advice of NRW or the Authority's Ecologist
<b>Bodies Responsible</b>	BBNPA	<b>Data Sources</b>	Conservation Area Assessments

## Climate Change, Sustainable Design and Renewable Energy

**Primary Policy:** Strategic Policy SP2

**Other Policies:** Policy 5, New Policy Water Quality (p.29) SP18

**LDP Objectives:** SQ1, SQ2, SQ3 and SQ4

**Monitoring Aim:** All development to meet Sustainable Place Making Criteria

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
No development for highly vulnerable development will take place within the C1 and C2 floodplain area.	Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	No applications permitted for highly vulnerable development permitted within the C1 and C2 floodplain area.	1 or more planning applications permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)
To ensure no development will adversely impact on water quality or quantity.	Number of planning applications approved in any given year, contrary to the advice of Natural Resources Wales /Dwr Cymru Welsh Water on water quality or quantity grounds	No planning applications approved in any given year, contrary to the advice of Natural Resources Wales / Dwr Cymru Welsh Water on water quality or quantity grounds	1 or more planning applications approved in any given year, contrary to the advice of Natural Resources Wales / Dwr Cymru Welsh Water on water quality or quantity grounds

<p>To ensure all development proposals will give consideration to Climate Change adaptation techniques within a Design and Access Statement</p>	<p>Number of planning applications which consider Climate Change adaptation techniques with a Design and Access Statement.</p>	<p>All planning applications give consideration to Climate Change adaptation techniques within a Design and Access Statement</p> <p>Production of Small Scale Renewable Energy Developments SPG</p>	<p>1 or more major planning application fails to give consideration to Climate Change adaptation techniques within a Design and Access Statement in any given year.</p> <p>Small Scale Renewable Energy Development SPG not complete by 2017</p>
<p>All development proposals are able to demonstrate consideration of the use of renewable energy resources.</p>	<p>Number of applications for larger developments of more than 3 dwellings or 500 sqm of gross floor space for commercial development that fail to provide at least 20% of their energy requirements from low or zero carbon resources</p>	<p>All planning applications for larger developments of more than 3 dwellings or 500 sqm of gross floor space for commercial development provide at least 20% of their energy requirements from low or zero carbon resources</p>	<p>3 or planning applications approved in any given year for developments of more than 3 dwellings that fail to provide at least 20% of their energy requirements from low or zero carbon resources</p> <p>2 or planning applications approved in any given year of developments of more than 500sqm of gross floor space for commercial development that fail to provide at least 20% of their energy requirements from low or zero carbon resources</p>
<p>To facilitate appropriate Renewable</p>	<p>Amount of development for Renewable</p>	<p>No inappropriate Renewable Energy</p>	<p>1 planning permission for Renewable</p>

Energy schemes in locations that do not have a significant adverse impact on the special qualities of the National Park.	Energy schemes	schemes are developed within the National Park that have a significant adverse impact on its special qualities.	Energy scheme that has a significant adverse impact on the special qualities of the National Park.
To increase the amount (in MW) of energy produced in the National Park from renewable sources.	Permitted and installed capacity (MW) of renewable electricity and heat projects within the National Park.	Annual increase in the permitted or installed capacity of renewable electricity and heat projects within the National Park through the Plan period.	No annual increase in the permitted or installed capacity of renewable electricity and heat projects within the National Park
To measure the impact of policies in the LDP on the sustainability of our communities.	Ecological footprint of listed settlements	No rise in ecological footprint of listed settlements from average 5.46 global hectares per capita	2% rise in ecological footprint of listed settlements
Adoption of Supplementary Planning Guidance (SPG)	Revision and adoption of SPG on Sustainable Design in Welsh National Parks	By the end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG on Small Scale Renewable Energy Developments	By the end of 2014	
<b>Bodies Responsible</b>	BBNPA Environment Agency Wales Dwr Cymru Welsh Water	<b>Data Sources</b>	Planning Applications Register Environment Agency Wales Data Design and Access Statements Joint Housing Land Availability Studies

## Delivering Housing

**Primary Policy:** Strategic Policy: SP5

**Other Policies:** SE1, SP5, PX allocations), P1, P11, P12, P15, SE2, SP6, P13, P14, PX (Gypsy new policy), P16

**LDP Objectives:** SQ2 and SQ3

**Monitoring Aim:** Requires 1990 new homes (including 510 affordable dwellings) to be accommodated in the National Park during the Plan period.

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
Maintain a 5 year supply of housing land for development throughout the plan period.	Forecast supply of housing land.	Maintain a 5 year supply of housing land for development throughout the plan period.	Less than a 5 year supply of housing land is recorded.
Provide 1990 new dwellings by 2022	Number of consents granted and new dwellings completed annually	2012 -2017 = 174 dwellings completed per annum 2018 -2022 = 224 dwellings completed per annum	+/- 20%  Less than 696 or over 1044 dwellings developed by 201
Provide 1990 new dwellings by 2022	Number of units granted and new dwellings completed annually in each settlement tier	Level 1: Primary Settlements - 297 dwellings (31%) Level 2: Key settlements – 150 dwellings (16%) - Level 1 & 2 - 447 dwellings (47%)  Level 3: Settlements - 350 dwellings (36%) Level 4: Limited Growth Settlements Level 5: Countryside Allocated brownfield sites: 163 (17%)	+/- 20 for three consecutive years  >50% of dwellings granted outside Level 1 & 2 settlements over a 3 year period.
Provide 1990 new dwellings by 2022	Annual number of dwellings granted consent on mixed use sites	To monitor during LDP period	To monitor during LDP period
Sustainable development land	All applications granted planning permission to achieve a density of 30 dwellings per hectare		+ 5 planning consents below a density of 30 dwellings per hectare

Affordable housing percentage target in Policy13	Target will reflect economic circumstances	<p>Abergavenny, Hay and Crickhowell submarket : 30% affordable</p> <p>Brecon, Carmarthenshire and Rural Hinterland submarket: 20% affordable</p> <p>Heads of the Valley and Rural South submarket: 0% affordable</p>	<p>If average house prices increase by 5% (2.5% in the Heads of the Valley and Rural South )above the base price of 2012 levels sustained over 2 quarters then the Authority will consider other triggers identified in the Affordable Housing SPG and may conduct additional viability testing and modify the targets established in Policy 13.</p> <p><i>Trigger points:</i></p> <p><i>+/- 5% in house prices in the Abergavenny, Hay, Crickhowell, Brecon, Carmarthenshire and Rural Hinterland submarket</i></p> <p><i>+/- 2.5% in house prices in the Heads of the Valleys and Rural South submarket</i></p>
Provide a target of 510 affordable dwellings by 2022	Number of affordable dwellings granted consent per annum	47 affordable dwellings to be granted per annum	<p>+/- 30%</p> <p>&lt;38 units consented per annum for 3 consecutive years</p>
Provide a target of 510 affordable dwellings by 2022	Number of affordable dwellings completed per annum	20 affordable dwellings to be completed per annum	<p>+/- 25%</p> <p>&lt;15 dwellings completed per annum for 3 consecutive years</p>
Provide a target of 510 affordable dwellings by 2022	Number of market dwellings on sites of 3 dwellings or more coming forward as a result of non-viability (i.e. dwellings that are not viable and have therefore resulted		<p>&gt;10 market dwellings granted permission per annum for three consecutive years</p>



	in open market housing with a commuted sum)		
Provide a target of 510 affordable dwellings by 2022	Number of affordable dwellings consented per annum via windfalls	3 dwellings per annum	+/- 30%  <2 affordable dwellings granted planning consent per annum for 3 consecutive years
Provide a target of 510 affordable dwellings by 2022	Number of affordable dwellings granted planning permission via exception sites per annum	4 affordable dwellings per annum	< 2 affordable dwellings granted planning permission via exception sites per annum
Occupation of the allocated Gypsy & Traveller site.	Occupation of the allocated Gypsy & Traveller site.	Occupation of the allocated Gypsy & Traveller site by 2017.	Non-occupation of the allocated Gypsy & Traveller site 2017 due to it not being available for development.  Replacement site identified for Gypsy & Traveller occupation.
Adoption of Supplementary Planning Guidance (SPG)	Revision and adoption of SPG on Affordable Housing	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG on Policy 13: Affordable Housing Contributions	By end of 2014	
	Revision and adoption of SPG on Replacement of Dwellings & Extensions to dwellings in the countryside	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Revision and adoption of SPG on the Conversion of Farm & Other Buildings to Dwellings	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG on Reinstatement of former dwellings in the countryside	By end of 2014	
Adoption of Supplementary Planning Guidance (SPG)	Revision and adoption of SPG on Planning Obligations	By end of 2014	Open space provision falls below the standard required by the constituent

			Unitary Authority
<b>Bodies Responsible</b>	BBNPA Powys C.C.	<b>Data Sources</b>	Planning Applications Register Joint Housing Land Availability Study Caravan Count Gypsy & Traveller Protocol

## Economic Wellbeing

**Primary Policy:** Strategic Policy SP12

**Other Policies:** P17, P18 and P19

**LDP Objectives:** SQ2 and SQ3

**Monitoring Aim:** Protect existing and allocated employment land

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
1.5 ha of employment land allocated by Policies SE3 and PX are developed over the Plan period.	Employment land development on Policies SE3 and PX sites in hectares.	0.75 ha of employment land allocated by Policies SE3 and PX are developed over the Plan period.	< 0.5 ha of employment land allocated developed by 2017
Protection of existing employment land	Loss of employment land	No loss of existing employment land	1 application granted permission on existing employment land for non-employment land uses.
B use employment generating permission granted consent in Sennybridge / Defynnog	Employment land development in Sennybridge / Defynnog	Permission granted by 2017	1.43 ha of employment land granted planning permission within settlements (excluding allocations) or beyond settlements under Policy 19 by 2017
B use employment generating permission granted consent in Hay-on-Wye	Employment land development in Hay-on-Wye	Permission granted by 2017	0.6 ha of employment land granted planning permission within settlements (excluding allocations) or beyond settlements under Policy 19 by 2017
	Adoption of SPG on Farm Diversification	By end of 2014	
<b>Bodies Responsible</b>	BBNPA	<b>Data Sources</b>	Annual Employment Land Survey

## Retail

**Primary Policy:** Strategic Policy SP13

**Other Policies:** SE6, SE8, P24, P26, P26a

**LDP Objectives:** SQ2, SQ5

**Monitoring Aim:** To ensure that the Towns in the National Park retain vibrant and vital retail centres supported by a diverse mix of services and facilities

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
To ensure vacancy rates within the town centres of the National Park do not increase so as to adversely impact on the vitality of those centres.	Annual vacancy rates of the town centres of the National Park.	Vacancy rate in the town centre of Brecon remains below 10%, Hay-on-Wye and Crickhowell remain below 5% and the vacancy rate in Talgarth is reduced to 25%  Monitor vacancy rate of retail units up to 2017 and review Policy 24 if considered necessary.	Vacancy rate in the town centre of Brecon surpasses 15%, Hay-on-Wye surpasses 6%, Crickhowell surpass 6% and Talgarth surpasses 40%
<b>Bodies Responsible</b> BBNPA		<b>Data Sources</b> Planning Applications Register	

## Sustainable Tourism

**Primary Policy:** Strategic Policy: SP14

**Other Policies:** SE5, P28, P29, P30

**LDP Objectives:** SQ1, SQ3, SQ4, SQ7, SQ8, SQ9, SQ10

**Monitoring Aim:** Encourage high quality Sustainable Tourism

<b>Policy Target</b>	<b>Indicator</b>	<b>Annual / Interim Monitoring Target</b>	<b>Assessment Trigger</b>
To increase year on year the number of visitors to the National Park	Number of new or improved tourism facilities	Planning consents for new or improved tourism facilities	0 planning consents for new or improved tourism facilities
<b>Bodies Responsible</b>	BBNPA	<b>Data Sources</b>	Planning Applications Register STEAM

## Sustainable Communities

**Primary Policy:** Strategic Policy SP15

**Other Policies:** P32, P33 and P35

**LDP Objectives:** SQ2, SQ6

**Monitoring Aim:** The retention of existing community uses and facilities and seek to development new ones, where needed.

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
The retention or enhancement of Community Facilities.	Number of applications approved contrary to Strategic Policy SP15 and the protective aim of Policy 32 resulting in loss of community facilities through change of use.	No applications approved contrary to Strategic Policy SP15 and the protective aim of Policy 32 resulting in loss of community facilities through change of use.	1 application approved contrary to Strategic Policy SP15 and the protective aim of Policy 32 resulting in loss of community facilities through change of use.
Amenity / Open Space Provision	Hectares of recreational open space per 1000 population (FIT Standard) in line with constituent Unitary Authorities	Working towards FIT standards of 2.4 hectares of recreational open space per 1000 projected population	
<b>Bodies Responsible</b>	BBNPA	<b>Data Sources</b>	Planning Application Register

## Infrastructure

**Primary Policy:** Strategic Policy SP19

**Other Policies:** P37, P38, PX Water and Sewage Supply for New Development, PX – Use of Non Mains Sewerage Solutions

**LDP Objectives:** SQ9

**Monitoring Aim:** To ensure that all new development is serviced by sustainable and appropriate infrastructure

Policy Target	Indicator	Annual / Interim Monitoring Target	Assessment Trigger
The use of SUDs are considered in all new residential and employment development (with the exception of conversions and extensions to existing properties and premises).	Amount of new development providing SUDs	>80% of all planning consents approved for new residential and employment development including SUDs where appropriate in their design (with the exception of conversions of and extensions to existing properties and premises).	<50% of all planning consents approved for new residential and employment development including SUDs where appropriate in their design (with the exception of conversions of and extensions to existing properties and premises).
<b>Bodies Responsible</b>	BBNPA	<b>Data Sources</b> Planning Applications Register	

## Waste

**Primary Policy:** Strategic Policy SP7

**Other Policies:** P42, P43

**LDP Objectives:** SQ11

**Monitoring Aim:** Seeks to meet any need for local waste facilities within the National Park

<b>Policy Target</b>	<b>Indicator</b>	<b>Annual / Interim Monitoring Target</b>	<b>Assessment Trigger</b>
Availability of vacant units/land within the identified B class sites which is suitable to accommodate a local waste facility	Amount of vacant units/land within the identified B class sites suitable to accommodate a local waste facility is zero	Availability of vacant units/ land within the identified B class sites which is suitable to accommodate a local waste facility	No available vacant units/land on the B class sites identified, for a local waste facility
Availability of vacant units/land within the identified B class sites which is suitable to accommodate a local waste facility	Number of new licensed waste management facilities permitted	Area of B2 employment land (sq m) developed for waste management facilities	No new facilities granted permission by 2017
<b>Bodies Responsible</b>	BBNPA South East and South West Wales Regional Waste Groups	<b>Data Sources</b>	Planning Applications Register South East and South West Wales Regional Waste Group.



## Minerals

**Primary Policy: None**

**Other Policies:** P45, P46, P47 and P48

**LDP Objectives:** SQ8 and SQ12

**Monitoring Aim:** Safeguard areas of aggregate resources

<b>Policy Target</b>	<b>Indicator</b>	<b>Annual / Interim Monitoring Target</b>	<b>Assessment Trigger</b>
No permanent, sterilising development will be permitted within a minerals safeguarding area.	Number of planning permissions for permanent, sterilising development permitted within a minerals safeguarding area.	No permanent, sterilising development will be permitted within a minerals safeguarding area.	1 permanent, sterilising development permitted within a minerals safeguarding area.
Adoption of Supplementary Planning Guidance (SPG)	Adoption of SPG on Policy 45: Mineral Safeguarding	By end of 2014	
<b>Bodies Responsible</b>	BBNPA South Wales Regional Aggregates Working Party (SWRAWP)	<b>Data Sources</b>	Planning Applications Register Regional Technical Statement SWRAWP Annual Survey

## Appendices

Change Number	AFC/Composite Plan Part	Reason	MAC						
MAC-A-1a	New Appendix Item	As suggested by the Inspector	Housing Supply table added to Appendix:						
			<b>Source</b>		<b>Disputed No. of Dwellings</b>	<b>No. Affordable Dwellings</b>	<b>Five Year Land Supply</b>		
			Completions	2007 - 2012	251	67	NA		
			Under Construction	1/4/2012	66	8	66		
			Allocations	2012-2022	960	230	448		
			Commitments		326	73 (+£59K commuted sum)	272		
			Small Sites		220	53	220		
			Windfalls		150	30	NA		
			School Sites		72	14	20		
			<b>TOTAL</b>		<b>2,045</b>	<b>475</b> (+£59k commuted sum)	<b>1026</b>		
			<b>Flexibility allowance</b>		<b>3%</b>	<b>NA</b>	<b>NA</b>		
				<b>TOTAL LAND SUPPLY IN YEARS</b>	<b>5.9</b>				
MAC-A-1	N/A  New Appendix item	Additional Information	New Housing 'Commitments' table added to Appendix:						
				<b>Settlement tier</b>	<b>Settlement</b>	<b>Site</b>	<b>Site Code</b>	<b>No. Dwellings</b>	<b>No. of Affordable Housing Provided</b>
			<b>First 5 years</b>	Primary Key Settlement	Brecon	Cross Yard, The Watton	COM-BR-A	12	£59k commuted

								sum	
					Cwmfalldau Fields	B15	13	16	
			Key Settlements	Hay-on-Wye	Central Garage	COM-HOW-A	18	0	
				Sennybridge	Land opposite Castle Farm	SALT 002/092	42 <sup>2</sup>	4	
				Talgarth	Land at Trefecca Road	COM-TLG-A	5	1	
					Land adj Churchfields	COM-TLG-B	12	0	
					North of Doctor's Surgery	T9	36	7	
			Level 3 Settlements	Gilwern	Ty-Mawr Farm	COM-GIL-A	25	7	
				Llanelly Hill	Darenfelin Primary School	COM-LH-A	25	0	
				Llanvihangel Crucorney	Land bordering Llanvihangel Crucorney (Housing Association)	COM-LC-A	8	8	
					Land Opposite Skirrid Inn, Twr Mihangel	COM-LC-B	9	2	
					Land opposite Pen-Y-Dre Farm	DBR-LC-D	14	4 (2 flats and 2 houses)	

<sup>2</sup> Site currently subject to an application for the approval of Reserved Matters which includes a layout illustrating 54 units.

					Pencelli	Land at Penybont	DBR- PENC-B	11 <sup>3</sup>	1
					Pontneddfechan	Tara Country Club	COM- PNF-A	5	0
					Rhosaman	Land adj Rhoslan	COM- RSM-A	15	0
				Level 4 Settlement	Llangynidr	Land at Castle Road	COM- LGY-A	5	1
				Countryside	Brynmawr	Former E-Mag Factory	COM- BRM-A	94 <sup>4</sup>	0
					Llantillio Pertholey	Woodland Tree Services	COM- LNP-A	17	6
					<b>Total</b>			<b>366</b>	<b>57 (+£59k Commuted sum)</b>
			<b>Rest of LDP Period</b>	Primary Key Settlement	Brecon	Derek Evans Garage, Adj Silver Street	COM- BR-B	15	0
				Key Settlement	Sennybridge	Old Station Yard	COM- SNB-A	2	0
				Level 3 Settlement	Bwlch	Heol Las Farm	COM- BCH-A	7	0
					Pontsticill	Adj Pontsticill	COM- PSTC-A	12	0
					Llangyndir	Adj Glan yr Afron	COM- LGY-B	18	4
					<b>Total</b>			<b>54</b>	<b>4</b>
			<b>TOTAL</b>					<b>422</b>	<b>61 (+£59k)</b>

<sup>3</sup> The site is split and benefits from two permissions (5 units and 6 units)

<sup>4</sup> Potential risk to the deliverability of this site in its entirety given the currently intended route of the A465

									Committed sum)	
<b>MAC-A-2</b>	N/A  New Appendix item	Additional Information	New Housing 'Completions' table added to Appendix:							
				<b>Year</b>	<b>Settlement</b>	<b>Site</b>	<b>No. Dwellings</b>	<b>No. of Affordable Housing Provided</b>		
			<b>Completed</b>	2007/08	Brecon	Former Elstons Garage	5	0		
							Land off Dan-y-Crug	5	0	
						Crichowell	Fynnonau	24	24	
						Llanelly Hill	Penffyddlyn East	1	0	
						Llanfrynach	White Swan PH	6	0	
						Pontneddfechan	Tara Country Club	2	0	
						Ynyswen	Riverside Gardens	3	0	
				Total Large Sites 2007/08			46	24		
				Small Site Completions 2007/08			19	NK		
				<b>TOTAL 2007/08</b>			<b>65</b>	<b>24</b>		
				2008/09	Bwlch	Springbank Close	1	0		
						Hay-on-Wye	Central Garage	7	0	
							Land adj Medical Centre,	9	0	

				Forest Road		
			Total Large Sites 2008/09		17	0
			Small Site Completions 2008/09		38	NK
			<b>TOTAL 2008/09</b>		<b>55</b>	<b>0</b>
		2009/10	Brecon	Cefn Cantref Farm	1	0
				Former Children's Home	9	9
			Hay-on-Wye	Central Garage	5	0
			Llangynidr	Coed-yr-Ynys Road	3	0
			Pontneddfechan	Tara Country Club	2	0
			Trecastle	Former Primary School	8	8
			Total Large Site Completions 2009/10		28	17
			Small Site Completions 2009/10		17	NK
			<b>TOTAL 2009/10</b>		<b>45</b>	<b>17</b>
		2010/11	Brecon	Cefn Cantref Farm	1	0
			Total Large Site Completions 2010/11		1	
			Total Small Site Completions 2010/11		18	NK
			<b>TOTAL 2010/11</b>		<b>19</b>	<b>0</b>
		2011/12	Brecon	Former Police Station	26	26
				Cefn Cantref Farm	1	0
				Cwmfalldau Fields	21	0

					Llantillio Pertholey	Woodland Tree Services	1	0	
					Total Large Site Completions 2011/12		49		
					Total Small Site Completions 2011/12		18	NK	
					<b>TOTAL 2011/12</b>		<b>67</b>	<b>26</b>	
			<b>TOTAL</b>				<b>251</b>	<b>67</b>	
<b>MAC-A-3</b>	N/A  New Appendix item	Additional Information	New 'School Sites' table added to Appendix. These have been identified as potential sites to provide additional housing windfall:						
					<b>Settlement</b>	<b>Site</b>	<b>No. Dwellings</b>	<b><u>Affordable housing Target</u></b>	
			<b>First 5 years</b>	Govilon	Govilon Primary	20	<u>6</u>		
			<b>Rest of LDP Period</b>	Hay-on-Wye	Hay-on-Wye County Primary	35	<u>11</u>		
				Talgarth	Talgarth County Primary	20	<u>4</u>		
				Pontneddfechan	Ysgol Thomas Stephens	14	<u>0</u>		
				Brecon	St Joseph's Primary	18	<u>4</u>		
			<b>TOTAL</b>			<b>107</b>	<b><u>25</u></b>		
<b>MAC-A-4</b>	Appendix 2 – Requirements of Development	As suggested by the Inspector	PLEASE SEE PROPOSED CHANGES TO APPENDIX 2-REQUIREMENTS OF DEVELOPMENT FOLLOWING THE APPENDICES						
<b>MAC-A-5</b>	Appendix 6 – Planning Obligations	As suggested by the Inspector	<p>Appendix 6 amended as follows:</p> <p>The development of the National Park will impact on its environment, communities, amenities and physical infrastructure. As such the NPA will expect all development to mitigate the extent of this impact on the landscape and communities through the use of planning obligations on the granting of planning permissions.</p> <p>The NPA believes that the setting of Planning Obligations should be determined by the specific criteria of our designation to conserve and enhance this special living landscape for the benefit of our communities and the environment. As such the areas in which contributions will be sought are enshrined in BBNPA policy and supported by the vision and key aims of the National Park Management Plan and the LDP Objectives.</p> <p><b>Category 1 Contributions</b></p>						

			<p>Category 1 BBNPA specific planning obligations are a priority and will be sought as below:-</p> <p><b>a) Affordable Housing</b>          To ensure that developers meet the provision for affordable housing and that the affordable element is retained in perpetuity as set out in LDP Policy 13</p> <p><b>b) Biodiversity</b>          To secure measures to protect, enhance or reduce harm to protected sites or species of acknowledged nature conservation importance as set out in the NP's First Purpose, LDP Policy 3</p> <p><b>c) Sustainability</b>          To secure the provision of onsite renewable energy sources (or community facilities) and sustainable design as outlined in the LDP Objectives and LDP Policy SP11</p> <p><b>Category 2 Contributions</b></p> <p>Planning obligations sought from Category 2 contributions will be in addition to that specified for in category 1.</p> <p>The NPA is committed to securing positive contributions for the communities it serves. However in most cases the management of community services comes under the administrative jurisdiction of the relevant Unitary Authority.</p> <p>Therefore the NPA has defined the seeking of planning obligations for the benefit of community service areas as category 2 community contributions. These relate to contributions for which the NPA does not have administrative control over the service provision. In the case of the seeking of category 2 contributions, the NPA will negotiate planning obligations working in partnership with the relevant Unitary Authority (UA).</p> <p>In the seeking of category 2 contributions the BBNPA will adopt the policy positions of the specific UA. The UAs have formulated their approach to planning obligation contributions in line with their relevant Community Strategies and other related high level policy documents. These strategies are in turn based on an 'audit of need' exercise which help establish the evidence base upon which contribution levels are set. As such The NPA has decided to adopt this position to best serve the needs of our constituent communities.</p>
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			<ul style="list-style-type: none"> <li>• Instances where category 2 contributions may be sought include:</li> <li>• The provision and maintenance of open space and recreational areas in developments including enhancement of ‘public realm’ areas including waterside sites.</li> <li>• Provision or enhancement of existing Educational facilities.</li> <li>• Provision of sustainable transport links such as improved accessibility to public transport, park and ride services and cycle and footpaths.</li> <li>• Provision of community facilities (such as improvements to library facilities, existing community halls, bus shelters)</li> <li>• Provision or improvement of road infrastructure to serve a development</li> <li>• Provision, maintenance and management of existing recycling or community composting facilities</li> <li>• Improvements to access for disable people</li> <li>• Measures to offset negative impact on the integrity of cultural or archaeological heritage (including enhancements such as improved access to and interpretation of features of interest)</li> <li>• Provision of measures to improve community safety including CCTV</li> <li>• Provision or enhancement of existing healthcare facilities</li> <li>• Public art provision</li> <li>• Provision of local training initiatives</li> <li>• Flood risk management measures</li> <li>• Any other appropriate planning gain as judged according to a proven evidence of need on a site by site basis</li> </ul>
MAC-A-6	Appendix 11 Glossary of Terms	As suggested by CCW	<p>‘Natural Beauty’ definition amended as follows:</p> <p>Natural beauty: is a broad concept that is concerned with landscape in its broadest sense. Although it includes flora, fauna, geological and physiographic features, and applies to landscapes where nature is dominant it also applies to those which have been shaped and nurtured by human activities. People perceive and appreciate natural beauty through all their senses, responding to many different aspects of the landscape, including its distinctive character, its aesthetic qualities, the presence of wildlife , its cultural and historical dimensions and its perceptual qualities such as, for example tranquillity, remoteness and a sense of freedom. Perceptions, of and preferences for natural beauty are informed by people’s personal characteristics, cultural backgrounds and individual interests. Natural beauty occurs, to varying degrees, in many, though by no means all landscapes. Some places, however such as the Brecon Beacons National Park, display natural beauty to an outstanding degree and as a result warrant a national level of protection.</p>

## Appendix 2: Requirements of Development

### Residential

Site Code	Site Name	Settlement	No. of units	Requirements of Development
CS28	Cwmfalldau Fields Extension	Brecon	66	<p>1. There is a Greenfield Run-Off Restriction of 10 litres/sec/ha for any proposed development or impermeable surface within the Usk catchment. This also includes any surface water discharges to storm water sewers that ultimately drain into a watercourse. As the site is Greenfield &amp; over 1ha in size, consideration will be required for appropriate management of surface water to ensure that development doesn't increase flood risk to third parties. This should be implemented by inclusion of SUDS which also act to provide biodiversity and amenity enhancements.</p> <p>2. Site is 650m upstream of River Usk SAC. Is immediately adjacent to habitat identified in CCW survey as potentially suitable for breeding otter. Development close to known sites for protected species can lead to fragmentation of habitat etc. <i>'In line with the Habitats Regulations and in consultation with CCW, it will be necessary for project level assessments to be undertaken where there is a potential for significant effects on the River Usk SAC. Any development project that could have an adverse effect on the integrity of this European site will not be in accordance with the development plan, within the meaning of S.38(6) of the Planning and Compulsory Purchase Act 2004'</i>.</p> <p>3. A water supply can be made available to service the proposed development site. However off-site mains will be required. This will be provided by the developer to the satisfaction of DCWW.</p> <p>4. The public sewerage network is currently inadequate to accommodate the demands from this site. A hydraulic modelling assessment will be required to understand any potential improvements required. Pre-application discussions with DCWW and the NPA are recommended to address these constraints. Land is phased for development towards the end of the plan period to enable the implementation of necessary works by statutory undertaker. Development before phased release will require necessary works to raise capacity of the sewerage network to be provided to</p>

				<p>the satisfaction of DCWW, and are likely to be at developer’s expense.</p> <p>5. Waste Water Treatment works for the area has limited capacity to accommodate planned levels of growth without further improvement. Development is phased to accommodate DCWW to plan and implement necessary improvements works. Development before phased release is enabled where developers are able to implement necessary works to the satisfaction of DCWW. Developers looking to bring forward this site are encouraged to enter into early dialogue with DCWW at preliminary stages of the design process"</p> <p>6. Highways Authority will require that a carriage widening scheme with additional footway along Bailihelig Road should be included as a requirement of development. It is also likely that the junction of Bailihelig Road with Church Street will have inadequate capacity to accommodate this volume of extra traffic and further highways improvement may also be required. These highways works are likely to be at developers expense</p> <p>7. This site is within 250 meters of a former landfill site &amp; may be subject to potential contamination. Development proposals will be required to undertake survey and assessment to determine the nature, extent and risk to public health of any contamination and to prepare and implement any necessary remediation schemes to the satisfaction of the NPA and Powys CC Environmental Health department.</p> <p>8. As this site is adjacent to a trunk road it is likely that a traffic noise impact assessment &amp; scheme of noise mitigation will be request as a condition for any future planning permission.</p> <p>9. The site lies within the Middle Usk Valley Registered Historic Landscape, and the impacts of any larger scale development here may require assessment, in line with the published ASIDOHL2 methodology, as part of the planning process. Advice should be sought from Clwyd Powys Archaeological trust at the earliest possible stage of such development</p>
CS132	UDP allocation B17 Opposite High School,	Brecon	133	Requirements of development will be set out in the development brief.

	North of Hospital			
CS93	Slwch House Field	Brecon	23	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Brecon WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>3. Junction spacing with the access to Dering Lines may just be achievable but the necessary visibility splays to the east and forward along the carriageway from the roundabout may require earthworks on land outside this site boundary.</p>
DBR-BR-A	Site located to the North of Camden Crescent and to the East of the Breconshire War Memorial Hospital	Brecon	38	<p>1. There is a Greenfield Run-Off Restriction of 10 litres/sec/ha for any proposed development or impermeable surface within the Usk catchment. This also includes any surface water discharges to storm water sewers that ultimately drain into a watercourse. As the site is Greenfield &amp; over 1ha in size, consideration will be required for appropriate management of surface water to ensure that development doesn't increase flood risk to third parties. This should be implemented by inclusion of SUDS which also act to provide biodiversity and amenity enhancements.</p> <p>2. DCWW request that the Local Planning Authority restrict growth until improvements to our Brecon WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>4. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>5. Highways authority have expressed concerns regarding the topographical constraints posed by the development site in providing adoptable gradients to serve such a large scale development. This should be addressed in the design of the scheme in close consultation with Powys County</p>

				<p>Council Highways Authority and the NPA.</p> <p>6. This site is within 50 metres of a hospital &amp; may be subject to potential contamination which must be investigated as part of the design process, and necessary remediation undertaken</p>
DBR-BR-B	Site located the north of Cradoc Close and west of Maen-du Well	Brecon	33	<p>1. There is a Greenfield Run-Off Restriction of 10 litres/sec/ha for any proposed development or impermeable surface within the Usk catchment. This also includes any surface water discharges to storm water sewers that ultimately drain into a watercourse. As the site is Greenfield &amp; over 1ha in size, consideration will be required for appropriate management of surface water to ensure that development doesn't increase flood risk to third parties. This should be implemented by inclusion of SUDS which also act to provide biodiversity and amenity enhancements.</p> <p>2. DCWW request that the Local Planning Authority restrict growth until improvements to our Brecon WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>4. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>5. Access arrangements to be determined through consultation with Powys CC Highways Authority.</p> <p>6. Site is within 50 meters of unknown filled ground and may be subject to potential contamination. Investigation of extent of contamination and potential associated risk to be investigated as part of initial site assessments, and remediation works set out where necessary to the satisfaction of PCC Environmental Health Authority and the NPA.</p>
DBR-CR-A	Land above Upper House Farm	Crickhowell	20	<p>1. The environment agency advice that there is a Greenfield run-off restriction of 10 litres/sec/Ha applicable within this site, this also applies to surface water discharges which ultimately drain into a watercourse. Powys CC Drainage authority have indicated that they would require the adoption of surface water control techniques whereby attenuation to the 100yr standard is achieved whilst</p>

				<p>limiting continuation flow to the existing 1 in 1 year Greenfield run-off for the connected impermeable areas.</p> <p>2. There is an existing watercourse on site. Any culverting or works affecting the flow of watercourses will require prior written consent of EA under terms of the Land Drainage Act 91. The EA seeks to avoid culverting so such works will only be consented as a means of access.</p> <p>3. DCWW sets out have advised that there are no fundamental issues why this site cannot be delivered subject to the flooding incident being resolved.</p> <p>4. Design will need at address overcoming issues relating to the gradient of the site, with particular attention to achieving acceptable gradients for adoptable roads within the development scheme.</p> <p>5. An area of open space is maintained between the site and Great Oak Road in accordance with community preference.</p>
SALT 061	Land adjacent to Llangenny Lane	Crickhowell	20	<p>1. DCWW have advised that this site can be delivered.</p> <p>2. Powys County Council Highways Authority state that subject to meeting the appropriate highways conditions in terms of road widening, footway provision and access location and standards, this site can be delivered.</p>
DBR-HOW-C	Land adjacent to Fire Station	Hay-on-Wye	13	<p>1. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>2. A single point of access meeting all highways standards of alignment, gradient, radii and visibility would be required. The removal of the hedgerow across the front of the site will be required to ensure sufficient access, mitigation will be sought for the loss.</p> <p>3. Powys County Council have indicated that in mitigation for loss of amenity value a S106</p>

				will be sought to extend the nearby cemetery and its associated leisure use.
DBR- HOW-A	Land opposite to The Meadows	Hay on Wye	62	<p>1. DCWW have advised that provided an assessment of the Sewage Pumping Station (SPS) is undertaken and any improvement undertaken, there is no reason why this site cannot be progressed. Improvements to the SPS can be subject to appropriate planning conditions.</p> <p>2. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>3. Access will be located on the Westerly stretch of Gypsy Castle lane, at a suitable distance from the existing junction. Visibility splays may require the requisitioning of land outside of the proposed site boundary. Powys Highways authority have indicated that necessary improvements offsite will be required to make acceptable impacts from the development. improving the existing road junction and improvements to footways</p> <p>4. Powys County Council have indicated that obligations will be necessary of the development to take account of loss of amenity value of land, a S106 agreement is likely to be requested to extend the nearby cemetery and its associated leisure use.</p> <p>5. A Watercourse is present on sight, it is presumed that Riparian rights and responsibilities exist in respect of the watercourse on site the landowner is advised that they will be responsible for the maintenance of any section of the watercourse that passes or abuts the land. No buildings, structures or fences or planting shall take place within 5 meters of the top of the bank of the watercourse, or within 3 meters either side of the culverted watercourse. Surface Water Control measures will be required of any future development scheme.</p>
SALT 059	Land adjoining Brecon Pharmaceuti cals	Hay-on-Wye	5	<p>1. DCWW have advised that this site can be delivered.</p> <p>2. Powys County Council Highways Authority state that subject to this site meeting Highways Authority standards, this site can be delivered.</p>

				<p>3. The site lies within the Middle Wye Valley Registered Historic Landscape, &amp; the impacts of any large-scale development here may require assessment, in line with ASIDOHL2. Advice should be sought at an earliest possible stage of such development. The site contains the vestigial remains of medieval ditch revealed during archaeological recording of an adjacent development. Further archaeological investigation &amp; recording may be required here in advance of any future development.</p> <p>4. A Watercourse is present on sight, it is presumed that Riparian rights and responsibilities exist in respect of the watercourse on site the landowner is advised that they will be responsible for the maintenance of any section of the watercourse that passes or abuts the land. No buildings, structures or fences or planting shall take place within 5 meters of the top of the bank of the watercourse, or within 3 meters either side of the culverted watercourse. Surface Water Control measures will be required of any future development scheme.</p> <p>5. This site is within 50 metres of a pharmaceutical factory &amp; may be subject to potential contamination. The council's contaminated land condition B is likely to be requested for any future planning permission.</p> <p>6. It is likely that a noise impact assessment &amp; scheme of noise mitigation will be requested as a condition for any future planning permission.</p>
CS138	Glannau	Defynnog	15	1. The current access to this site is heavily congested with parked cars. Any future



	Senni			development scheme on this site must take into consideration options for mitigating impact on the existing highways network. This may include the provision of a one-way looped estate access road to service the proposed development and existing estate or other measure deemed appropriate by the Highways Authority Developers are urged to consult Powys Highways Authority at the earliest stage of the Design Process to ensure their proposal meets required standards for highways safety.
SALT 037	Proposed extension to T9 (allocated for housing (0.5ha) and new primary school	Talgarth	15	Requirements of development will be set out in the development brief.
DBR-BCH-J	Land adjacent to Bwlch Woods	Bwlch	15	<ol style="list-style-type: none"> <li>1. Ecological survey and mitigatory measures to address any loss of priority habitat will be a pre-requisite of any development. Pre-application discussion with both CCW and the NPA is advised.</li> <li>2. The proposed development site is crossed by a public water main for which protection measures, either in the form of an easement and/or diversification may be required.</li> <li>3 The proposed development site is crossed by a public sewer for which protection measures, either in the form of an easement and/or diversion may be required.</li> <li>4. Increased road frontage may be required to enable acceptable standards of visibility. Road widening and the provision of a footway along the class II road will be required and will be obligated on future development. Pre-application discussion with Powys County Council Highways Authority should be entered into at earliest opportunity.</li> <li>5. The site lies within 250 meters of a former landfill site and may be subject to potential contamination. . Development proposals will be required to undertake survey and assessment to</li> </ol>

				determine the nature, extent and risk to public health of any contamination and to prepare and implement any necessary remediation schemes to the satisfaction of the NPA and Powys CC Environmental Health department.
CS43	Land SW of Gwalia	Crai	6	<p>1. Bat flight lines noted on site, survey will be required including future mitigation measures</p> <p>2. DCWW have identified that insufficient capacity exists within the public sewerage treatment system and waste water treatment system to service development at density levels proposed. Land is therefore requested to be phased towards the end of the plan period to enable necessary upgrades to system in accordance with regulatory requirement. Development prior to this would be required to requisition necessary works to the satisfaction of DCWW to ensure satisfactory sewerage services for the proposed development. It is anticipated that this would be provided at developer's expense. . Developers looking to bring forward this site are encouraged to enter into early dialogue with DCWW at the preliminary stages of the design process</p> <p>3. The site is within 50 meters of a former railway and may be subject to potential contamination. Investigation and remediation measures are likely to be requested of any future development.</p>
CS42	Land at Crai	Crai	9	<p>1. Bat flight lines noted on site, survey will be required including future mitigation measures</p> <p>2. DCWW request that the Local Planning Authority restrict growth until improvements to our Crai WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>3. The site is within 50 meters of a former railway and may be subject to potential contamination. Investigation and remediation measures are likely to be requested of any future development.</p>
CS102	Lancaster Drive (Former UDP allocation GW2)	Gilwern	112	<p>1. There is a Greenfield Run-Off Restriction of 10 litres/sec/ha for any proposed development or impermeable surface within the Usk catchment. This also includes any surface water discharges to storm water sewers that ultimately drain into a watercourse. As the site is Greenfield &amp; over 1ha in size, appropriate management of surface water is a requirement of development, developers should take an innovative approach to this through the utilization of SUDS which form amenity</p>

				<p>and biodiversity enhancements on site.</p> <p>2. . DCWW request that the Local Planning Authority restrict growth until improvements to our Aberbaiden WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>3.Local residents have expressed concerns about traffic conditions in Broad mead and Dan y Bryn. It should also be noted that Lancaster Drive is not an adopted highway. Primary vehicle access should be derived from the ‘new’ road leading to Gilwern Park Industrial Estate, possibly by adapting existing junction and realigning the ‘old’ road. Possibly a secondary vehicle access could be from the A4077 Abergavenny Road. We would not expect vehicular connections to Boarded or Lancaster drive, but pedestrian links should be provided to provide sustainable linkages.</p>
CS39/69 /70/88/ 89/99	Land at Ty Clyd	Govilon	93	<p>1. There is a Greenfield Run-Off Restriction of 10 litres/sec/ha for any proposed development or impermeable surface within the Usk catchment. This also includes any surface water discharges to storm water sewers that ultimately drain into a watercourse. As the site is Greenfield &amp; over 1ha in size, appropriate management of surface water is a requirement of development, developers should take an innovative approach to this through the utilization of SUDS which form amenity and biodiversity enhancements on site.</p> <p>2. Water supply can be made available, however DCWW may request assessment to make provision for the entirety of site at highest possible densities</p> <p>3. DCWW request that the Local Planning Authority restrict growth until improvements to our Aberbaiden WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>4. Access arrangements would require further consultation with WAG due to proximity to the A465. Access could be obtained from B4246. Developer should provide new junction, highways improvements and or the extension of the existing traffic calming. Pre-application advise should be sought from the HA and BBNPA at the earliest possible stage prior to finalization of designs</p>

DBR-LIB-E	Land adjacent Pen y Fan Close	Libanus	3	1. It is presumed that Riparian rights and responsibilities exist in respect of the open or culverted watercourse. The landowner will be responsible to maintain any section of the watercourse that passes or abuts the land. The design scheme must reflect that no buildings, structures, fences or planting shall take place within 5 meters of the top of the bank or any watercourse, or 3 meters either side of any culverted watercourse. There are issues with localized flooding which will require attention. Consultation with Powys County Council Drainage Authority is advised prior to development.
DBR-LPD-A	Land off Heol St Cattwg	Llanspyddid	10	<p>1. The site lies within close proximity of Zone 2 of the Brecon Source Protection Zone (SPZ), as such the EA have requested that foul water from the properties is discharged to the foul sewer.</p> <p><u>2.</u> The site lies within the historic core of Llanspyddid, and the impacts of any development here may require prior evaluation, in line proposed Policy 49. The site also lies within the Middle Usk Valley Registered Historic Landscape, and the impacts of any larger scale development here may require assessment, in line with the published ASIDOHL2 methodology, as part of the planning process. Advice should be sought from Clwyd Powys Archaeological Trust at the earliest possible stage of such development</p> <p>3. Heol Sant Gattwg surface water drainage system is at capacity and no connection would be enabled. SUDS must be implemented whereby attenuation to the 100yr standard is achieved whilst limiting continuation flow to the existing 1 in 1 year Greenfield run—off for the connected impermeable areas.</p>
DBR-LBD-A	Land adjacent to St Peter's Close	Llanbedr	9	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Llanbedr WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Powys Highways Authority request that the extensions of St John's Close and its pedestrian footways should form part of the development and be carried out to Highways Adoptable Standards</p>
DBR-LGN-D	Land opposite Llanigon	Llanigon	10	2. The site is crossed by a public sewer for which protection measures would be sought by DCWW either in the form of easement or diversion.

	County Primary School			<p>3. DCWW advise that there are no fundamental issues why this site cannot be delivered.</p> <p>4. The site lies on the edge of the historic core of the settlement and future development may require appropriate evaluation and mitigation. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of any larger scale development here may require assessment in line with the published ASIDOHL2. Pre application advice with CPAT is recommended at the earliest stage of design.</p> <p>5. Access arrangements should be met from the north-eastern frontage at an appropriate distance from the junction. Opportunity should be taken to make small improvements to the footway links and radii at the junction opposite the school.</p> <p>6. It is assumed that Riparian rights and responsibilities exist in respect of the open or culverted watercourse and advise that the landowner will be responsible to maintain any section of the watercourse that passes or abuts the land.</p>
CS120	Land South of Ty Melys	Pencelli	6	<p>1. A water supply can be made available to service the proposed development site</p> <p>2. DCWW have identified that insufficient capacity exists within the public sewerage treatment system and waste water treatment works to service development. Land is therefore requested to be phased towards the end of the plan period to enable necessary upgrades to system in accordance with regulatory requirement. Development prior to this would be required to requisition necessary works to the satisfaction of DCWW to ensure satisfactory sewerage services for the proposed development. It is anticipated that this would be provided at developer's expense. Developers looking to bring forward this site are encouraged to enter into early dialogue with DCWW at the preliminary stages of the design process"</p> <p>3. The site lies on the edge of the historic core of the settlement and future development may require appropriate archaeological evaluation and mitigation. Pre application advise from CPAT is advised at earliest stages of design profile.</p>
DBR-PNT-D	Land adjacent to	Pennorth	6	<p>1. All woodland to the east of the plot should be retained. Bat survey will be required and lighting scheme should be designed to ensure no impact on bat roost or feeding activity as result of</p>

	Ambelside			<p>development</p> <p>3. Foul flows from the proposed development site can be accommodated within the public sewer. Please be advised that there are no public sewers in close proximity to the development and the developer may be expected to fund connections.</p> <p>4. Site lies within the Middle Usk Valley Registered Historic Landscape, and the impacts of development may require assessment in line with the published ASIDHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust in regard to this matter.</p> <p>5. The site lies adjacent to the possible line of a Roman road, and future development may require appropriate archaeological evaluation and mitigation.</p> <p>6. At time of Deposit the need for accommodation for 5 affordable units was identified. Provision of affordable housing will be required to be made on site unless determined otherwise by RSL.</p> <p>7. DCWW have advised there are no fundamental issues why this site cannot be delivered.</p>
CS91	Land to the West of Pontsicill House, Pontsicill	Pontsicill	6	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Pontsicill Usk WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Assumed access to development is via unmade substandard privately maintained track. To facilitate development junction on to the C234 and the existing assumed proposed access road would require upgrading to the current acceptable design criteria</p>
CS55	Land adjacent to Penygarn	Pontsicill	6	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Pontsicill Usk WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Access to the development should be provided via Pen Y Garn Houses</p>

DBR-PSTC-C	Land at end of Dan-y-Coed	Pontsicill	3	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Pontsicill Usk WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Access should be provided via the adopted highway serving Dan-y-Coed. Improvements to footpath network to the new development would be required.</p>
CS127	Land at Maesmawr Farm	Talybont-on-Usk	57	<p>1. DCWW request that the Local Planning Authority restrict growth until improvements to our Talybont-on-Usk WwTW are undertaken. Development may need to be phased to the latter part of the LDP to allow the time for the essential improvements to be undertaken.</p> <p>2. Site is crossed by a public sewer for which protection measures, either in the form of an easement and/or diversion may be required..</p> <p>3. Site lies within the Middle Usk Valley Registered Historic Landscape and the impacts of the development may require assessment in line with the published ASIDOHL2 methodology. Pre-application advice should be sought from Clwyd Powys Archaeological Trust</p> <p>4. No access would be permissible onto Maesmawr Lane along the Northern boundary of the site. Developer would need to provide significant improvements to the junction of Maesmawr Lane with the Class II road.</p> <p>5. This site is within 50 meters of premises used as a motor vehicle maintenance garage and petroleum tanks and may be subject to potential contamination. Evaluation and any necessary remediation will be required of any development.</p>
CS66	Former Army Camp, Cwrt-y-Gollen (site allocated for housing (3.7ha), employment	Allocated brownfield site	70	Requirements of development will be set out in the development brief.

	(1.84ha), remainder to comprise of community facilities and open space provision)			
CS111	Former Mid Wales Hospital (allocated for housing, employment and community use)	Allocated brownfield site	93	Requirements of development will be set out in the development brief.



**Mixed Use**

<b>Site Code</b>	<b>Site Name</b>	<b>Settlement</b>	<b>Size</b>	<b>Requirements of Development</b>
CS132	UDP allocation B17 Opposite High School, North of Hospital	Brecon	5.55	Requirements of development will be set out in the development brief.
SALT 037	Proposed extension to T9 (allocated for housing (0.5ha) and new primary school	Talgarth	2.06	Requirements of development will be set out in the development brief.
CS66	Former Army Camp, Cwrt-y-Gollen (site allocated for	Allocated brownfield site	24.1	Requirements of development will be set out in the development brief.

	housing (3.7ha), employment (1.84ha), remainder to comprise of community facilities and open space provision)			
CS111	Former Mid Wales Hospital (allocated for housing, employment and community use)	Allocated brownfield site	13.6	Requirements of development will be set out in the development brief.

**Employment**

Site Code	Site Name	Settlement	Size	Requirements of Development
CS78	Land adjacent to 5 <sup>th</sup> Avenue	Hirwaun Industrial Estate	4.96	<p>Development must ensure that there is no net increase in atmospheric emissions considered to be harmful to environmental sensitivity within the environs of the site.. To the satisfaction of the Environment Agency and CCW.</p> <p>Development is to ensure that it does not in any way exacerbate Nitrogen levels and acid deposition impacting upon Cors Bryn y Gaer SSSI</p> <p>Site comprises part Priority Habitat as set out in UK and BBNPA BAP. Full biodiversity survey and management plan will be required of any development proposal. Potential obligations necessary to mitigate and enhance against potential impact from development, either through on site active management or off site compensatory measures.</p> <p>Development of this site would require a Transport Impact Assessment to assess the impact on the highway network, suitable modes of travel and to provide mitigation measures accordingly</p> <p>In line with the Habitats Regulations and in consultation with CCW, it will be necessary for project level assessments to be undertaken where there is a potential for significant effects on Blaen Cynon SAC. Any development project that could have an adverse effect on the integrity of a European Site will not be in accordance with the development plan, within the meaning of</p>

				<p>S.38(6) of the planning and compulsory purchase Act 2004</p> <p>A procedure for air quality monitoring will be required, and data shared with EA, CCW and BBNPA on a yearly basis.</p>
CS132	UDP allocation B17 Opposite High School, North of Hospital	Brecon	5.55	Requirements of development will be set out in the development brief.
CS66	Former Army Camp, Cwrt-y-Gollen (site allocated for housing (3.7ha), employment (1.84ha), remainder to comprise of community facilities and open space provision)	Allocated brownfield site	24.1	Requirements of development will be set out in the development brief.
CS111	Former Mid Wales Hospital (allocated for	Allocated brownfield site	13.6	Requirements of development will be set out in the development brief.

	housing, employment and community use)			
CS26	Land adjacent to Hay Road	Talgarth	0.6	<p>1. DCWW have advised that this site can be delivered post improvements to Talgarth Wastewater Treatment Works, which is scheduled for 31<sup>st</sup> March 2015.</p> <p>2. Powys County Council Highways Authority state that subject to any access being positioned along the class III road frontage from where appropriate visibility splays can be achieved, this site can be delivered. Should it be utilised as an extension to the existing adjacent industrial areas consideration of the existing access arrangements will need to be made.</p> <p>3. Sites lies within the Middle Wye Valley Landscape of special historic interest. Consultation with CPAT at design stage is advised to ensure potential negative impact is mitigated for.</p> <p>4. The site is within 50 metres of unknown filled ground and may be subject to potential contamination. The Council’s contaminated land condition B is likely to be requested for any future planning permission.</p>

## Proposals Maps

Change Number	AFC/Composite Plan Part	Reason	MAC
MAC-PM-K	Proposals Map Key	As suggested by the Inspector	Limited Growth Settlement Extent (Level 4)
MAC-PM-1	Brecon Inset Map	To show housing commitments	Amend Brecon Inset Map to show housing commitments (B15, COM-BR-A and COM-BR-B). (See Appendix 1 to this document)
MAC-PM-2	Hay-on-Wye Inset Map	To show housing commitment, amendment to site boundary as a result of further evidence, removal of employment allocation as a result of further	Amend Hay-on-Wye Inset Map to show housing commitment (COM-HOW-A), amendment to site boundary (CS136), removal of employment allocation and reinstatement of community use (DBR-HOW-E) and change of allocation of affordable housing allocation to housing allocation (DBR-HOW-C). (See Appendix 2 to this document)

		evidence and removal of affordable housing allocation to comply with Strategy	
<b>MAC-PM-3</b>	Talgarth Inset Map	To show housing commitments	Amend Talgarth Inset Map to show housing commitments (T9, COM-TLG-A and COM-TLG-B).  (See Appendix 3 to this document)
<b>MAC-PM-4</b>	Sennybridge Inset Map	To show housing commitments and removal of mixed use allocation as a result of further evidence	Amend Sennybridge Inset Map to show housing commitments (SALT 002/ 092 and COM-SND-A) and removal of a mixed use allocation, to revert to white land (SALT 016/058) .  (See Appendix 4 to this document)
<b>MAC-PM-5</b>	Gilwern Inset Map	To show housing commitments	Amend Gilwern Inset Map to show housing commitment (COM-GIL-A).  (See Appendix 5 to this document)
<b>MAC-PM-6</b>	Llanfihangel Crucorney Inset Map	To show housing commitments	Amend Llanfihangel Crucorney Inset Map to show housing commitments (COM-LC-A, COM-LC-B and DBR-LC-D)

			(See Appendix 6 to this document)
<b>MAC-PM-7</b>	Pontsticill Inset Map	To show housing commitments	Amend Pontsticill Inset Map to show housing commitment (COM-PSTC-A) (See Appendix 7 to this document)
<b>MAC-PM-8</b>	Pontneddfechan Inset Map	To show housing commitment	Amend Pontneddfechan Inset Map to show housing commitment (COM-PNF-A) (See Appendix 8 to this document)
<b>MAC-PM-9</b>	Llangynidr Inset Map	To show housing commitment	Amend Llangynidr Inset Map to show housing commitments (COM-LGY-A and COM-LGY-B) COM-LGY-B has been amended to show the correct site boundary. (See Appendix 9 to this document)
<b>MAC-PM-10</b>	Hay-on-Wye Inset Map	As a result of further evidence	Amend Hay-on-Wye Inset Map to show the proposed Retail Centre (See Appendix 10 to this document)
<b>MAC-PM-11</b>	Hay-on-Wye Inset Map	To show proposed housing allocation (as a result of the Inspector's Preliminary Note)	Amend Hay-on-Wye Inset Map to show proposed housing allocation DBR-HOW-A (Land opposite the Meadows, Hay-on-Wye) (See Appendix 11)
<b>MAC-PM-12</b>	Hay-on-Wye	To show	Amend Hay-on-Wye Inset Map to show proposed housing allocation SALT 059 (Land adjoining Brecon

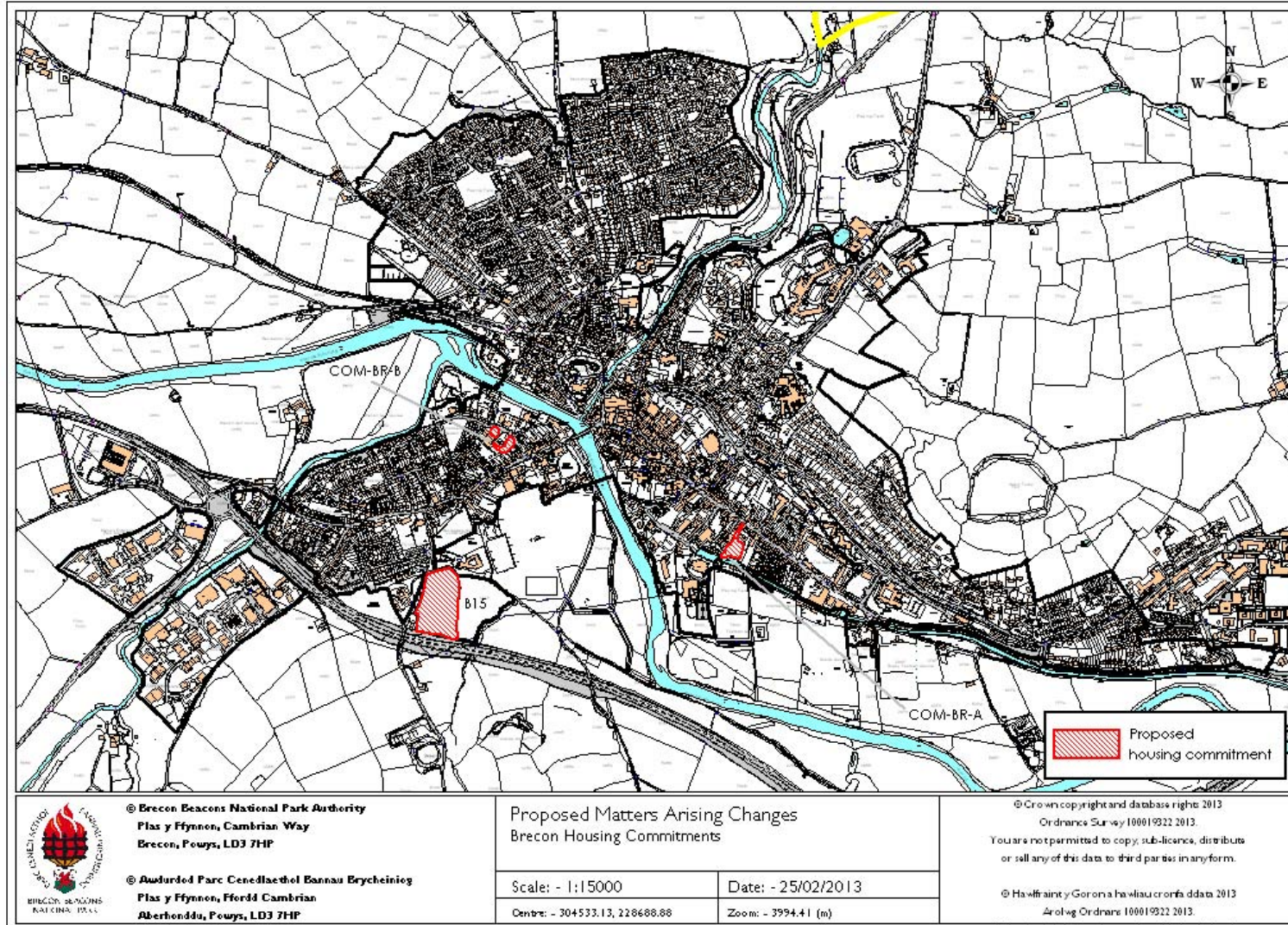



	Inset Map	proposed housing allocation (as a result of the Inspector's Preliminary Note)	Pharmaceuticals, Hay-on-Wye)  (See Appendix 12)
<b>MAC-PM-13</b>	Crickhowell Inset Map	To show proposed housing allocation (as a result of the Inspector's Preliminary Note)	Amend Crickhowell Inset Map to show proposed housing allocation SALT 061 (Land adjacent to Llangenny Lane)  (See Appendix 13)
<b>MAC-PM-14</b>	Talgarth Inset Map	To show proposed mixed use allocation and proposed employment allocation (as a result of the Inspector's Preliminary Note)	Amend Talgarth Inset Map to show proposed mixed use allocation SALT 037 (Land north of Doctor's Surgery) and proposed employment allocation SALT 035 (Land adjacent to Hay Road)  (See Appendix 14)
<b>MAC-PM-15</b>	New Former Army Camp (Cwrt-y-Gollen) Inset Map	To show proposed mixed use allocation (as	New Former Army Camp (Cwrt-y-Gollen) Inset Map to show proposed mixed use allocation SALT 030 (Former Army Camp)  (See Appendix 15)

		a result of the Inspector's Preliminary Note)	
<b>MAC-PM-16</b>	New Former Mid Wales Hospital Inset Map	To show proposed mixed use allocation (as a result of the Inspector's Preliminary Note)	New Former Mid Wales Hospital Inset Map to show proposed mixed use allocation CS111 (Former Mid Wales Hospital)  (See Appendix 16)
<b>MAC-PM-17</b>	1: 50,000 Proposals Map and Settlement Maps	To show primary / core roads network (to comply with National Planning Policy Guidance)	Amend Proposals Map to show 'primary / core roads network'  (See Appendix 17)
<b>MAC-PM-18</b>	1:50,000 scale Proposals Map and Settlement Maps	As suggested by Welsh Government	Amend Proposals Maps to show 'resources to be safeguarded' and the location of quarries  (See Appendix 18)
<b>MAC-PM-19</b>	Hay-on-Wye Inset Map	To remove allocations as a result of Final Hearing Session	Amend Hay-on-Wye Inset Map to show removal of CS136 and DBR-HOW-K as allocations, to revert to white land.

<b>MAC-PM-20</b>	Talgarth Inset Map	To remove allocation as a result of Final Hearing Session	Amend Talgarth Inset Map to show removal of CS137 as allocation, to revert to white land.
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**Appendix 1 (i) – MAC-PM-1**

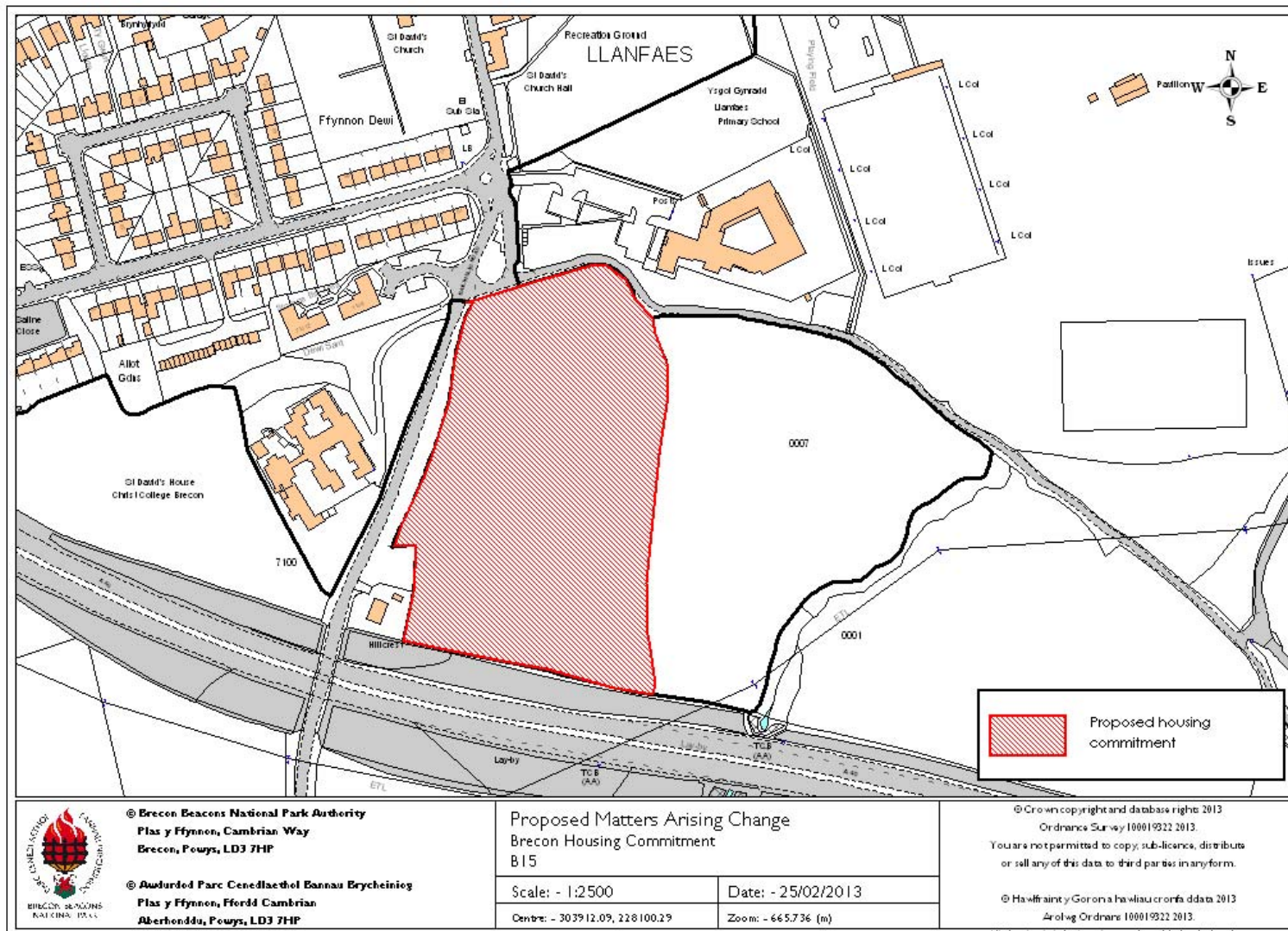



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Proposed Matters Arising Changes  
 Brecon Housing Commitments  
  
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## **Appendix 1 (ii) – MAC-PM-1**



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Proposed Matters Arising Change  
 Brecon Housing Commitment  
 B15

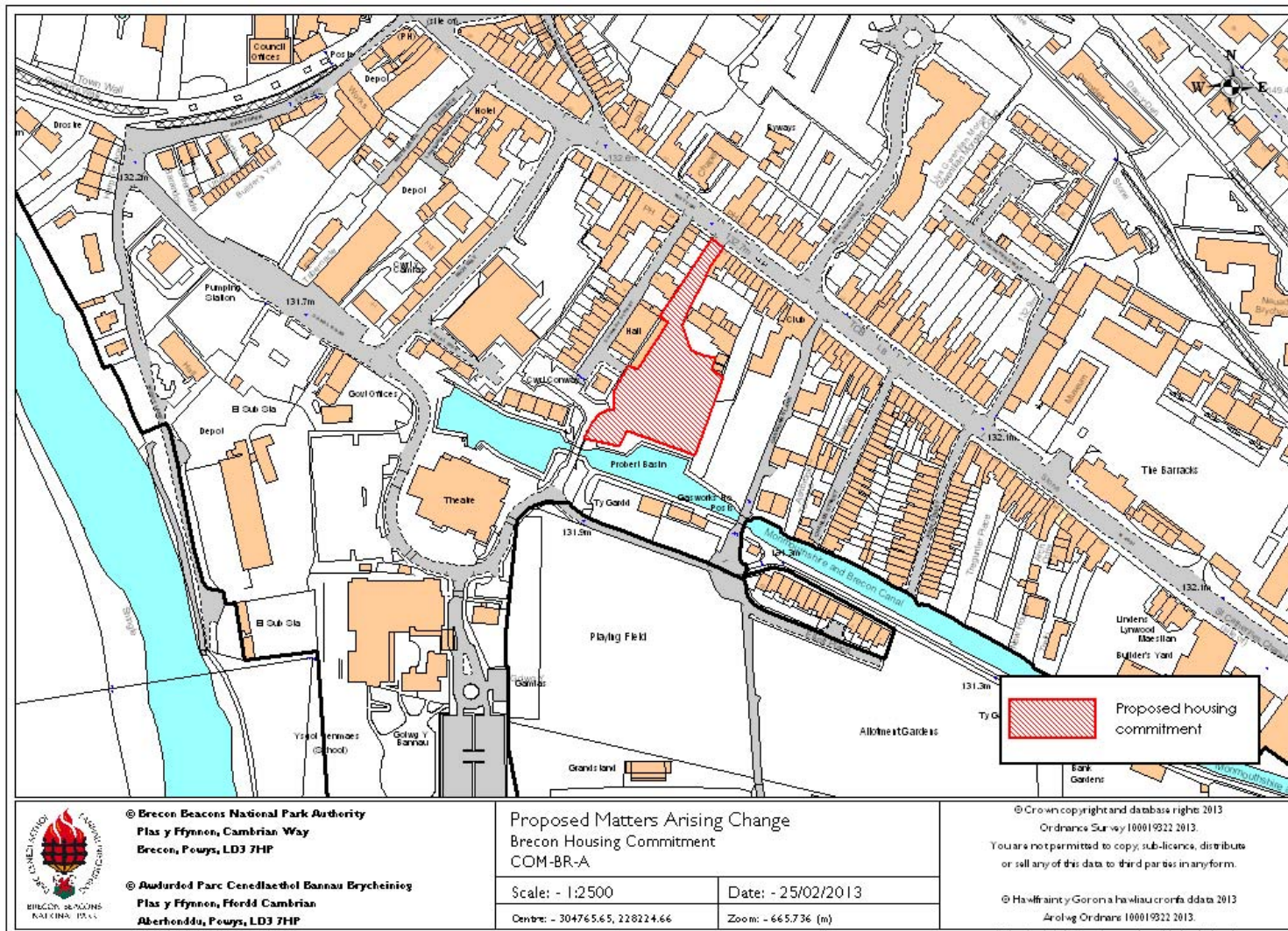
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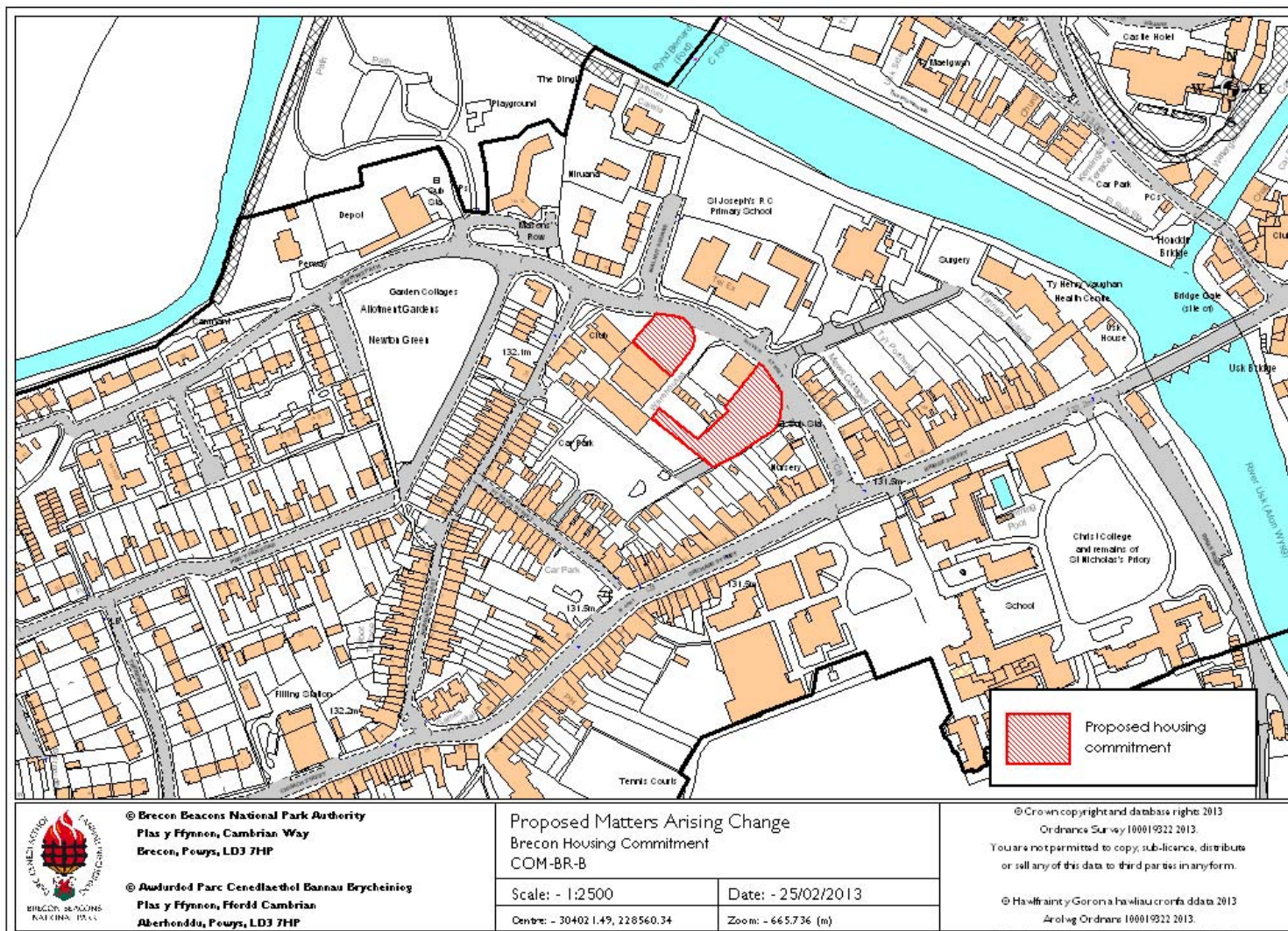
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## **Appendix 1 (iii) – MAC-PM-1**





**Appendix 1 (iv) – MAC-PM-1**




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Proposed Matters Arising Change  
 Brecon Housing Commitment  
 COM-BR-B

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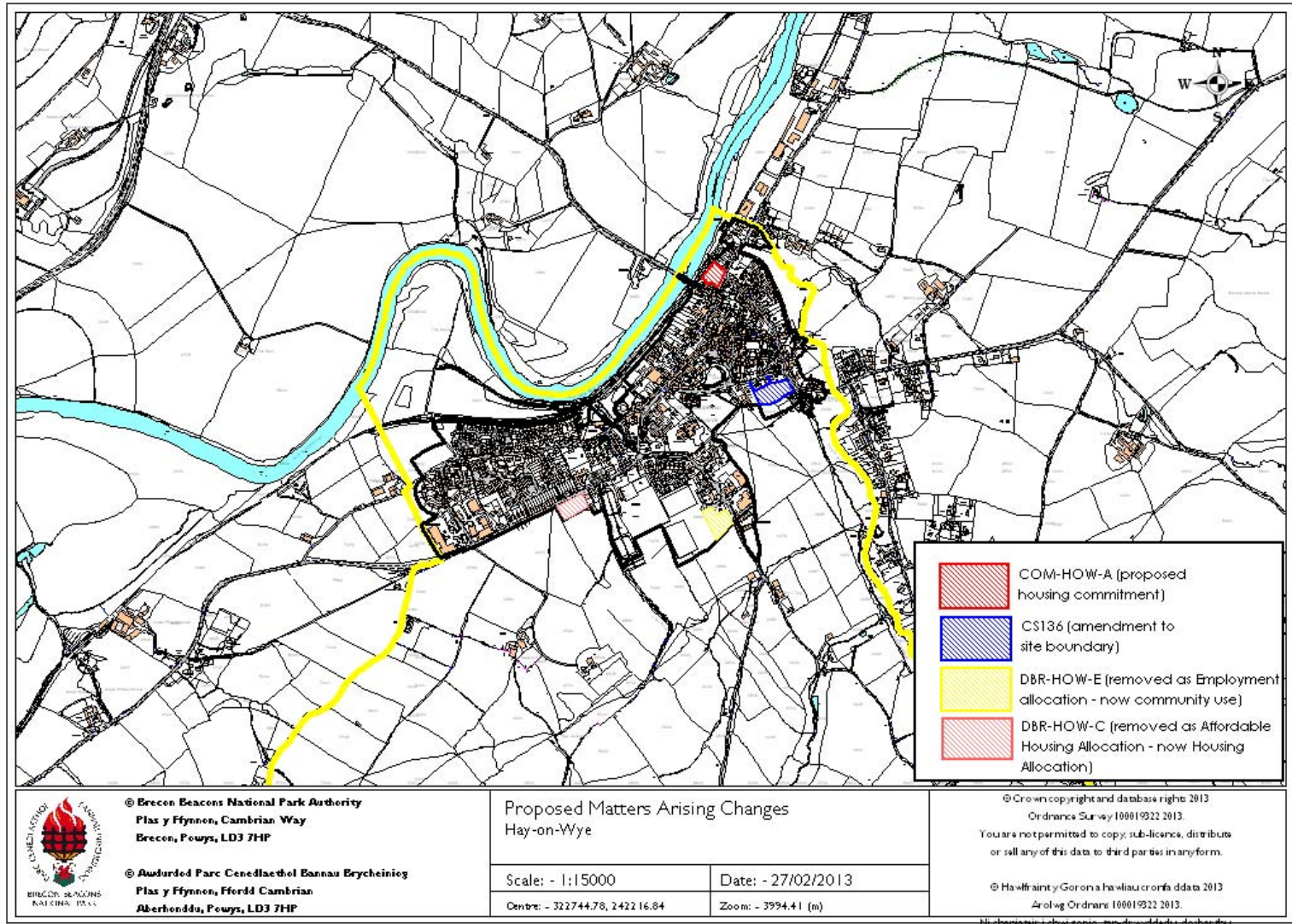
 Proposed housing commitment

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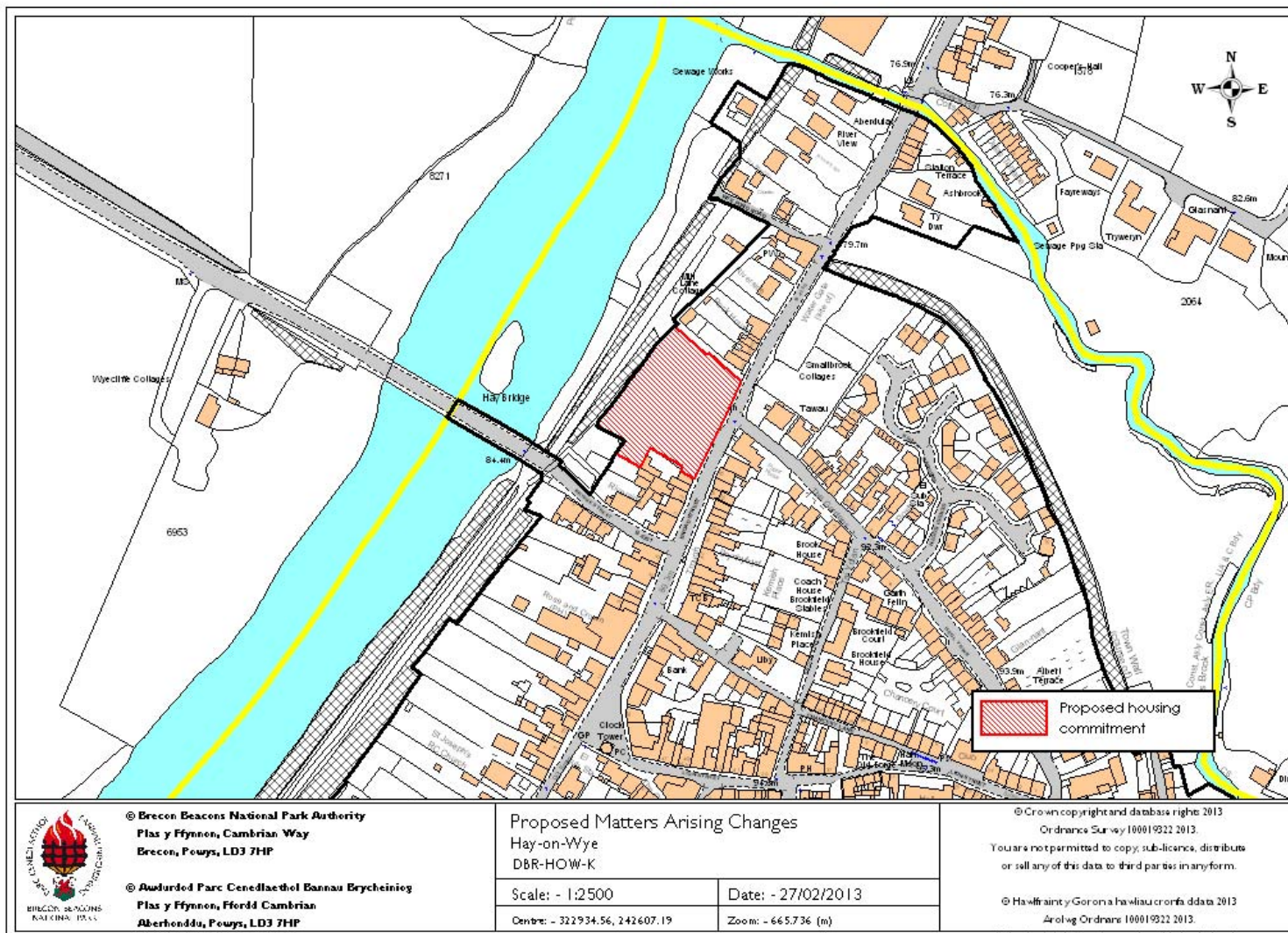
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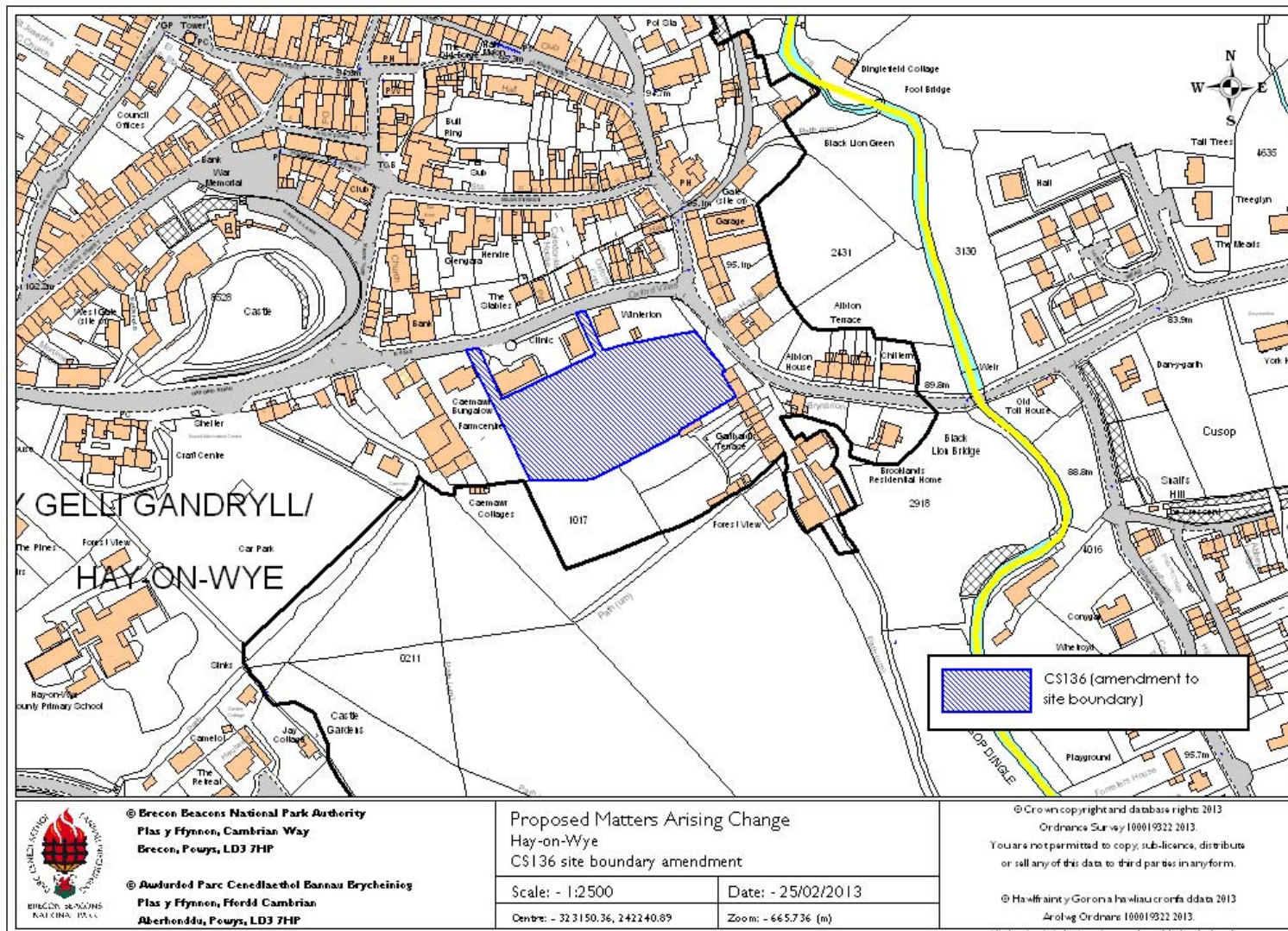
## **Appendix 2 (i) – MAC-PM-2**



## **Appendix 2 (ii) – MAC-PM-2**

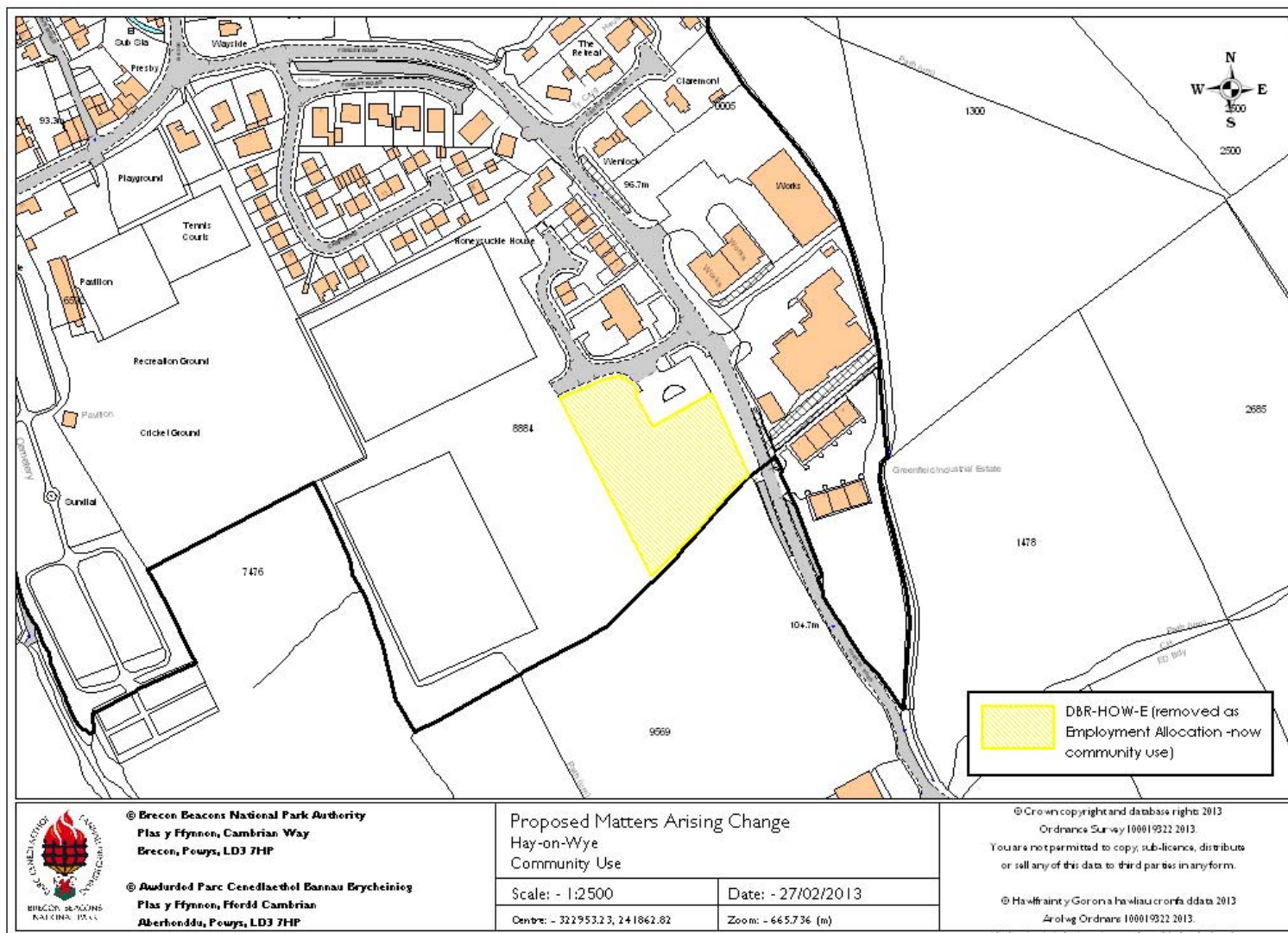



## **Appendix 2 (iii) – MAC-PM-2**



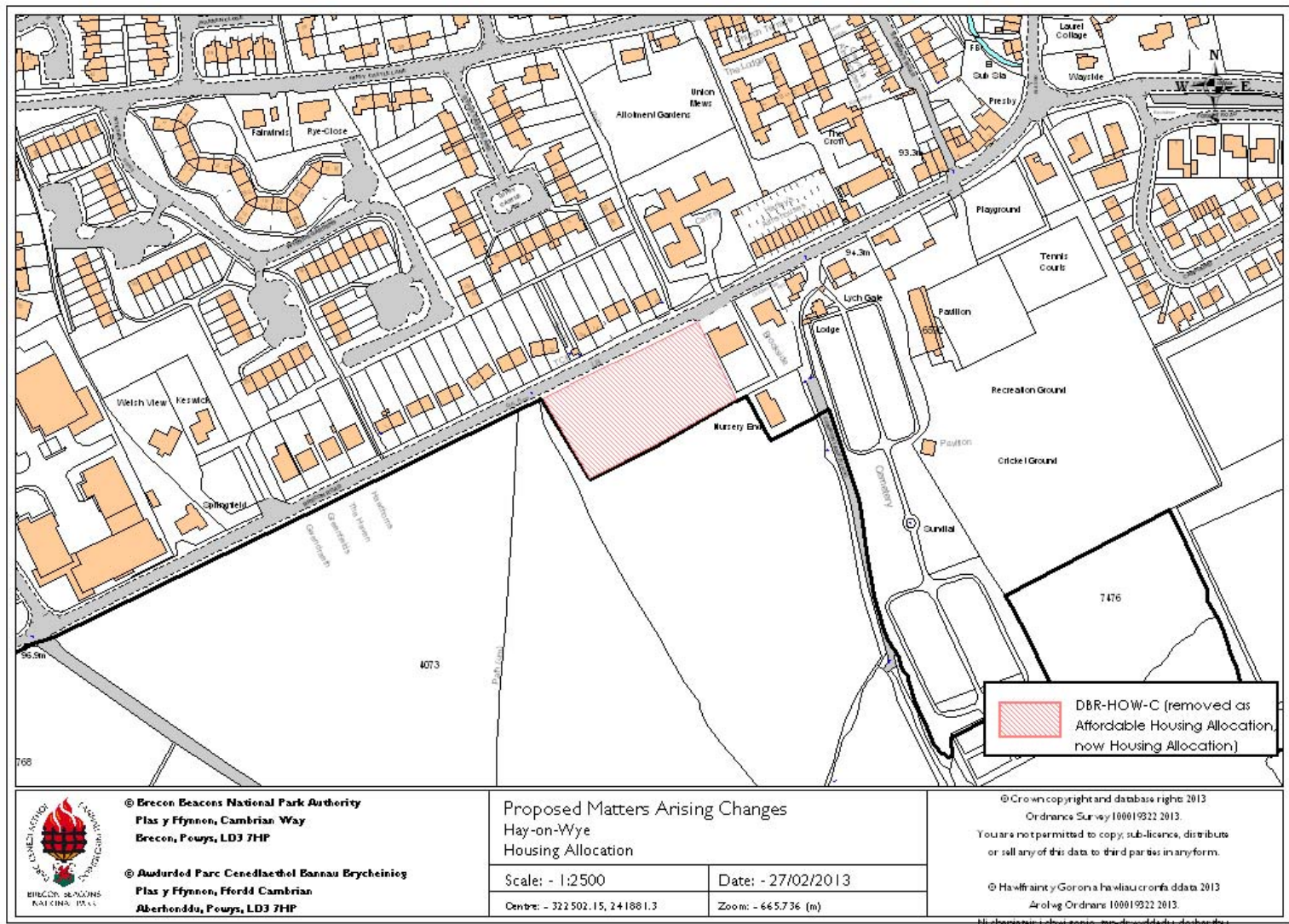


## **Appendix 2 (iv) – MAC-PM-2**



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## **Appendix 2 (v) – MAC-PM-2**



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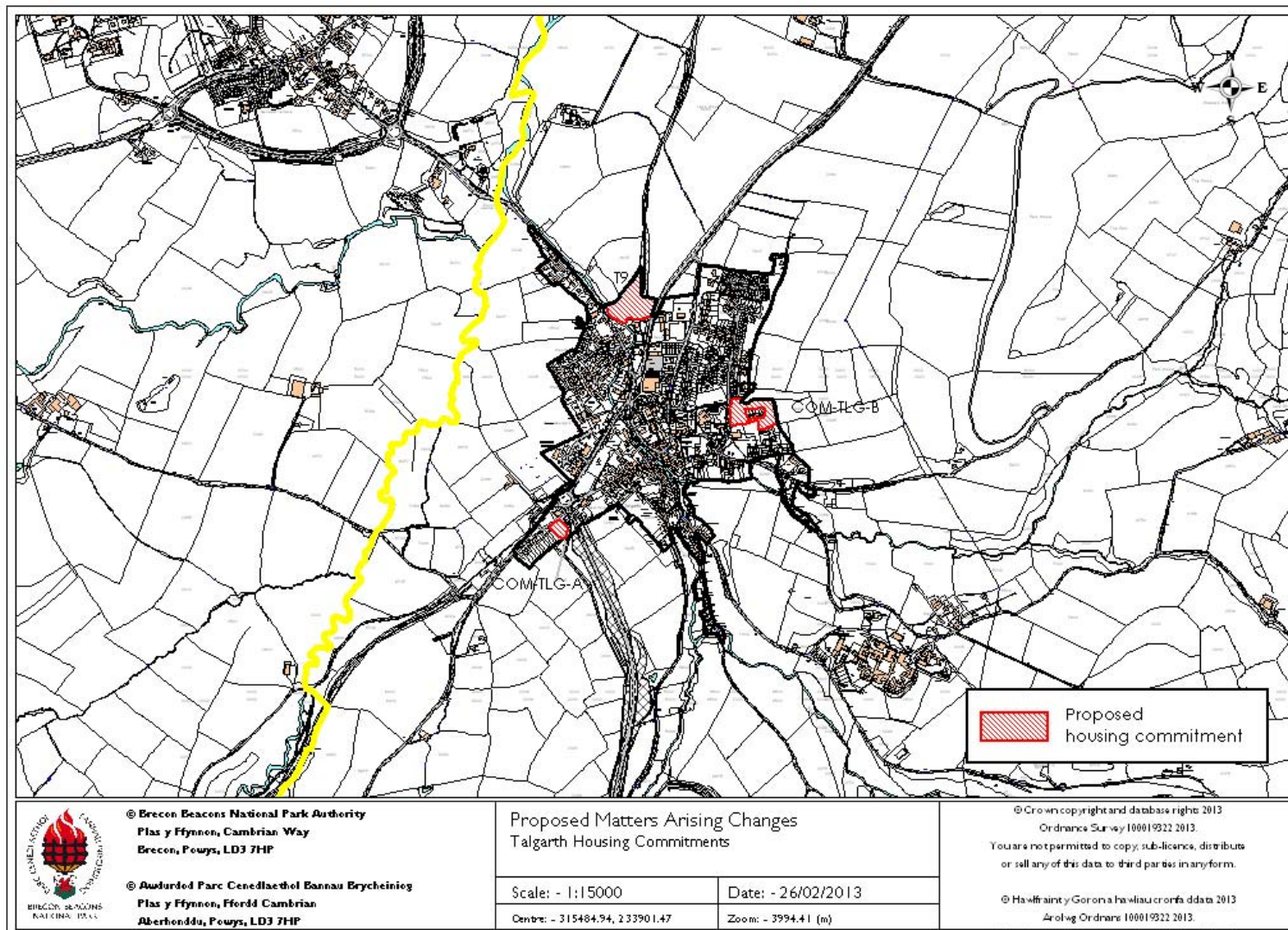
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 Hay-on-Wye  
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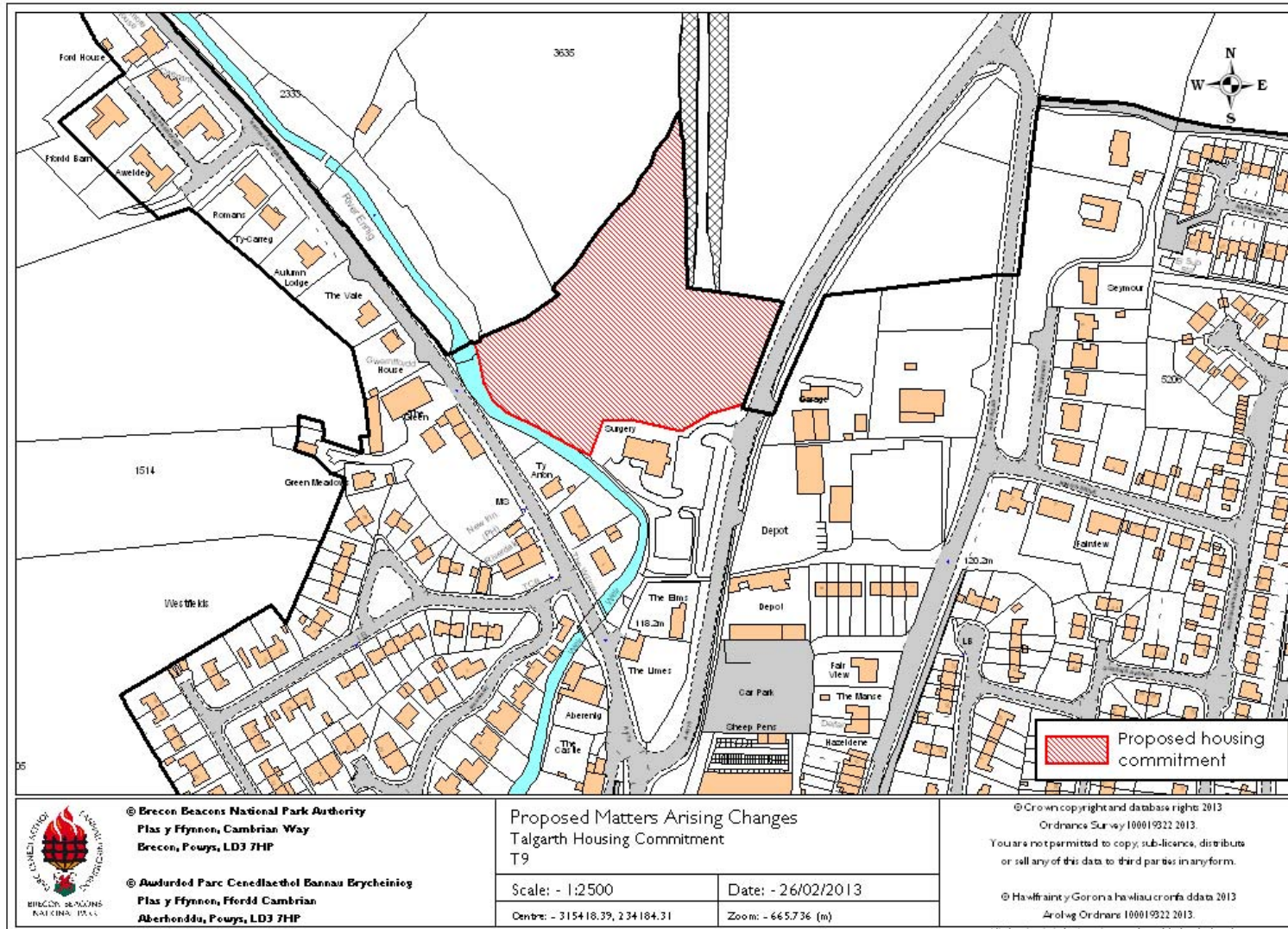
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### **Appendix 3 (i) – MAC-PM-3**



### **Appendix 3 (ii) – MAC-PM-3**



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Proposed Matters Arising Changes  
 Talgarth Housing Commitment  
 T9

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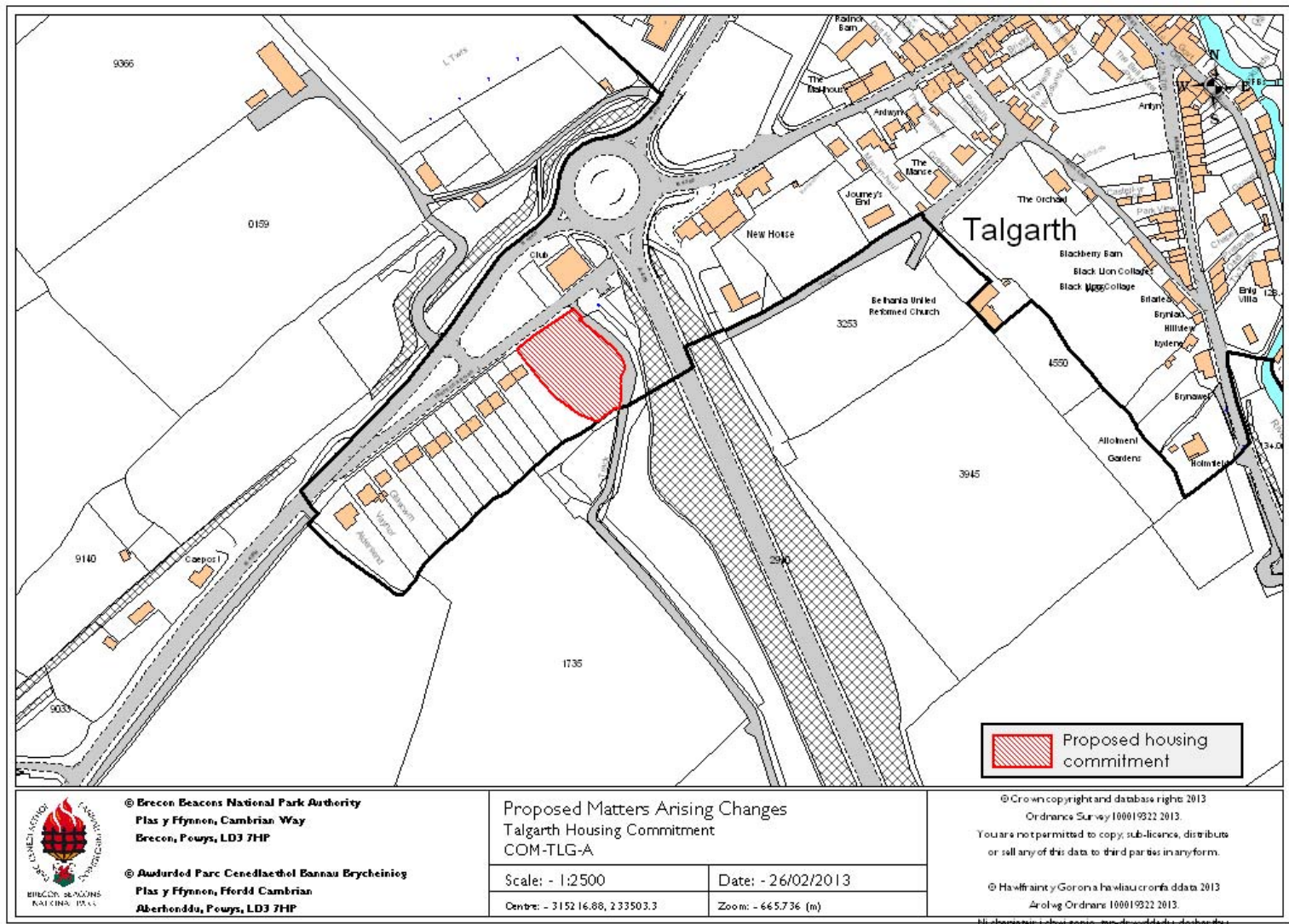
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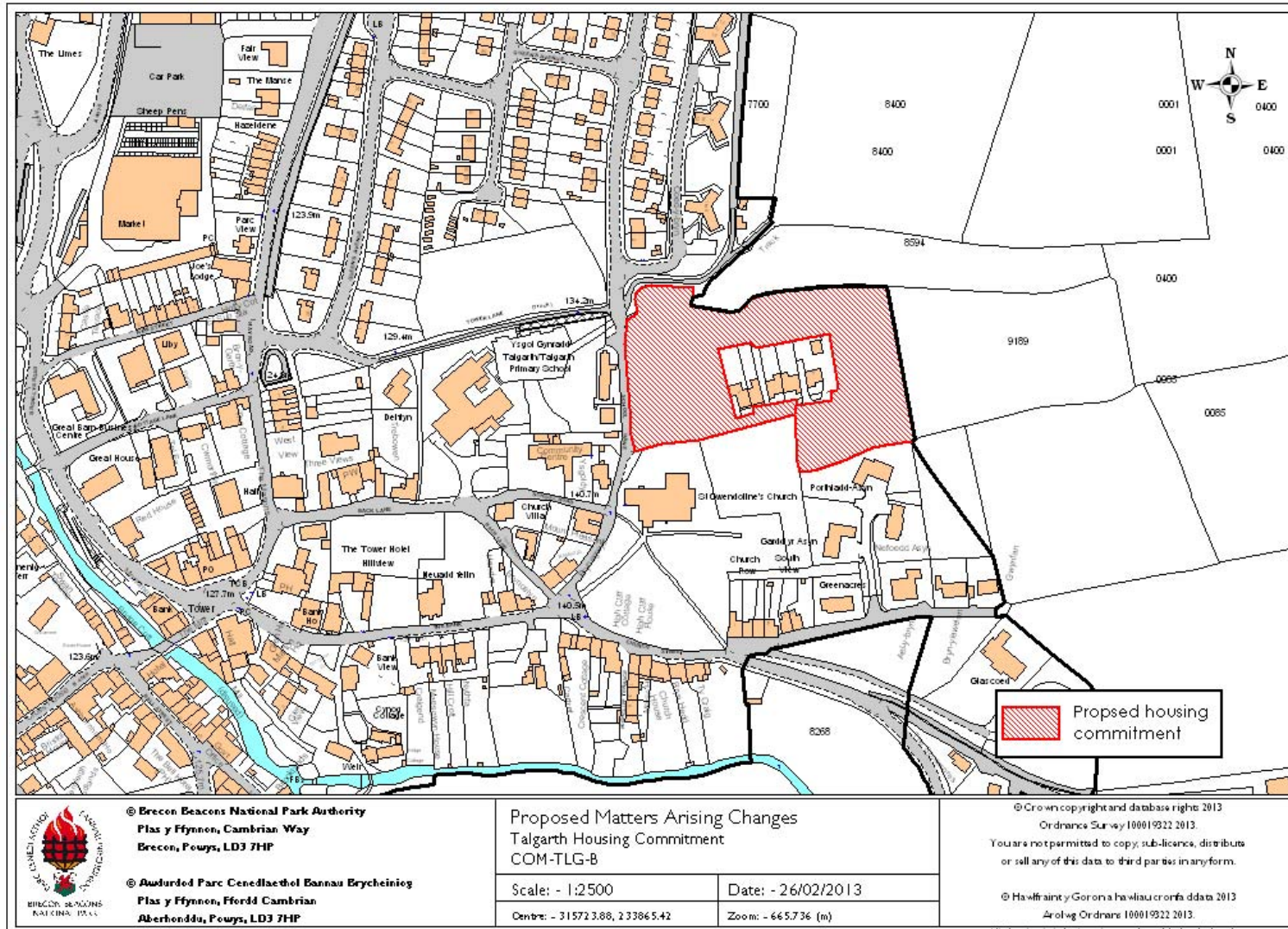
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### **Appendix 3 (iii) – MAC-PM-3**



### **Appendix 3 (iv) – MAC-PM-3**

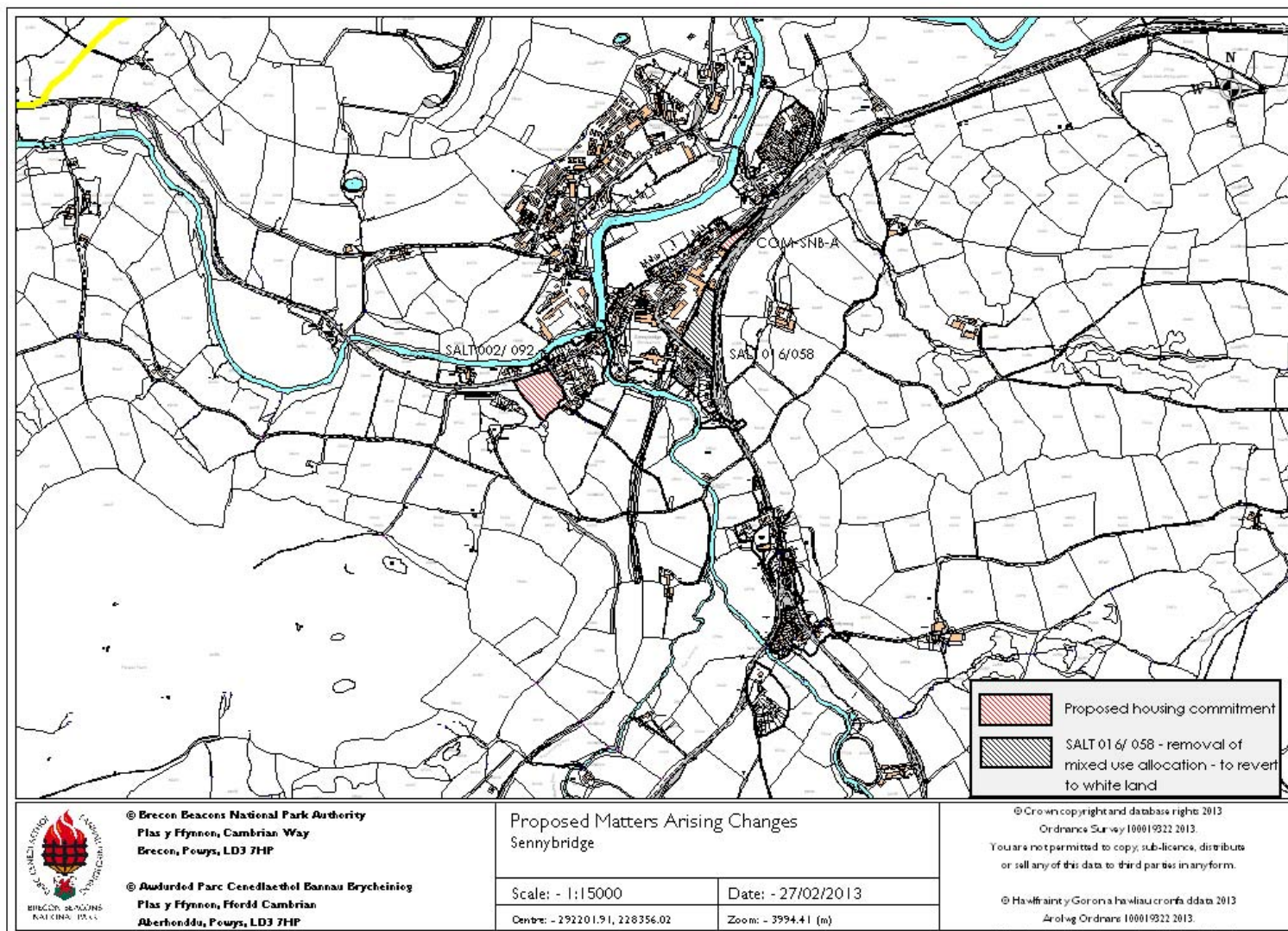



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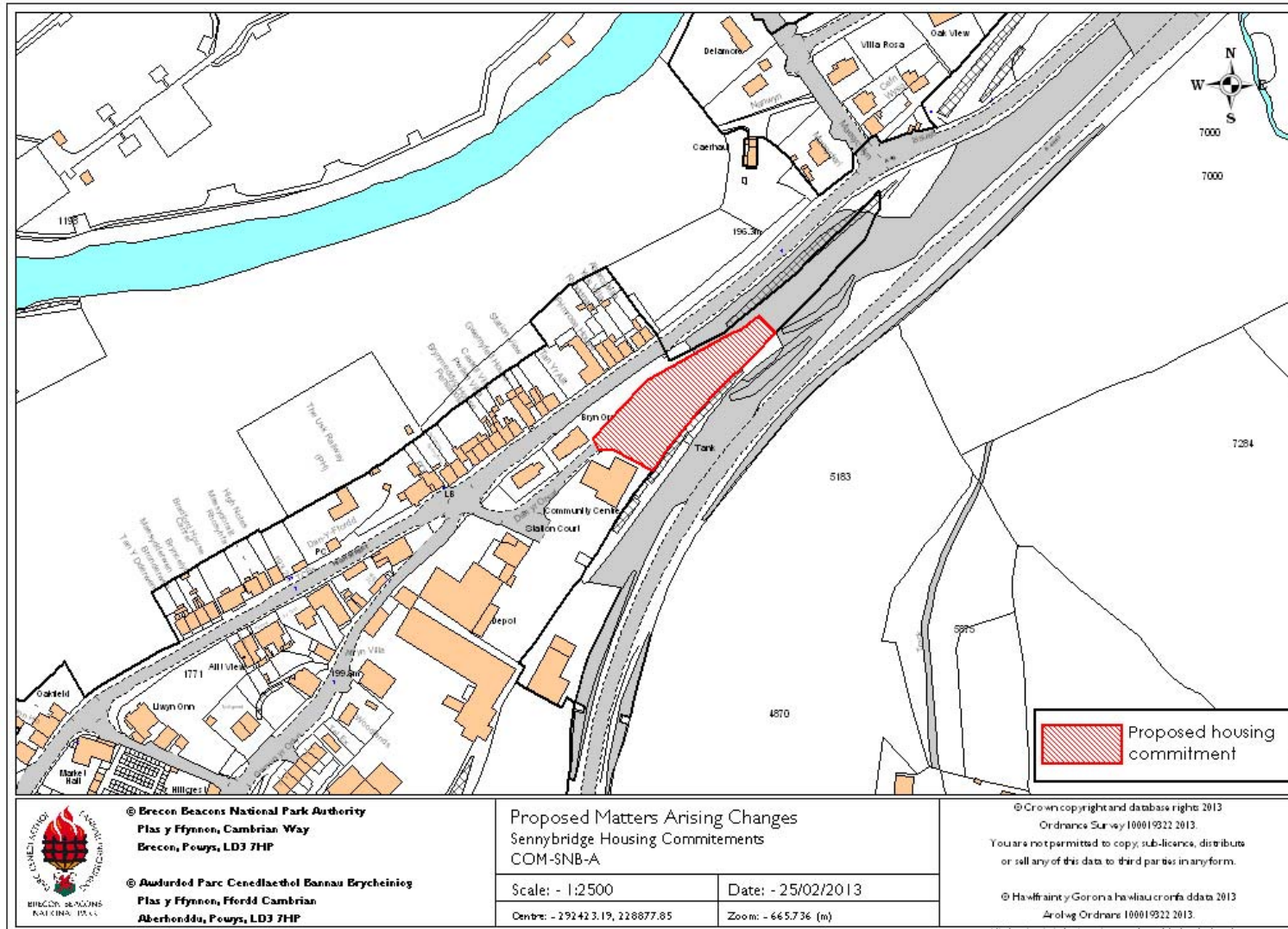
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 neu werthu y data yma i unrhyw drydydd bar o mewn unrhyw ffurf.

## **Appendix 4 (i) – MAC-PM-4**



## **Appendix 4 (ii) – MAC-PM-4**



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 Plas y Ffynnon, Ffordd Cambrian  
 Aberhonddu, Powys, LD3 7HP

Proposed Matters Arising Changes  
 Sennybridge Housing Commitments  
 COM-SNB-A

Scale: - 1:2500  
 Date: - 25/02/2013  
 Centre: - 292423.19, 228877.85  
 Zoom: - 665.736 (m)

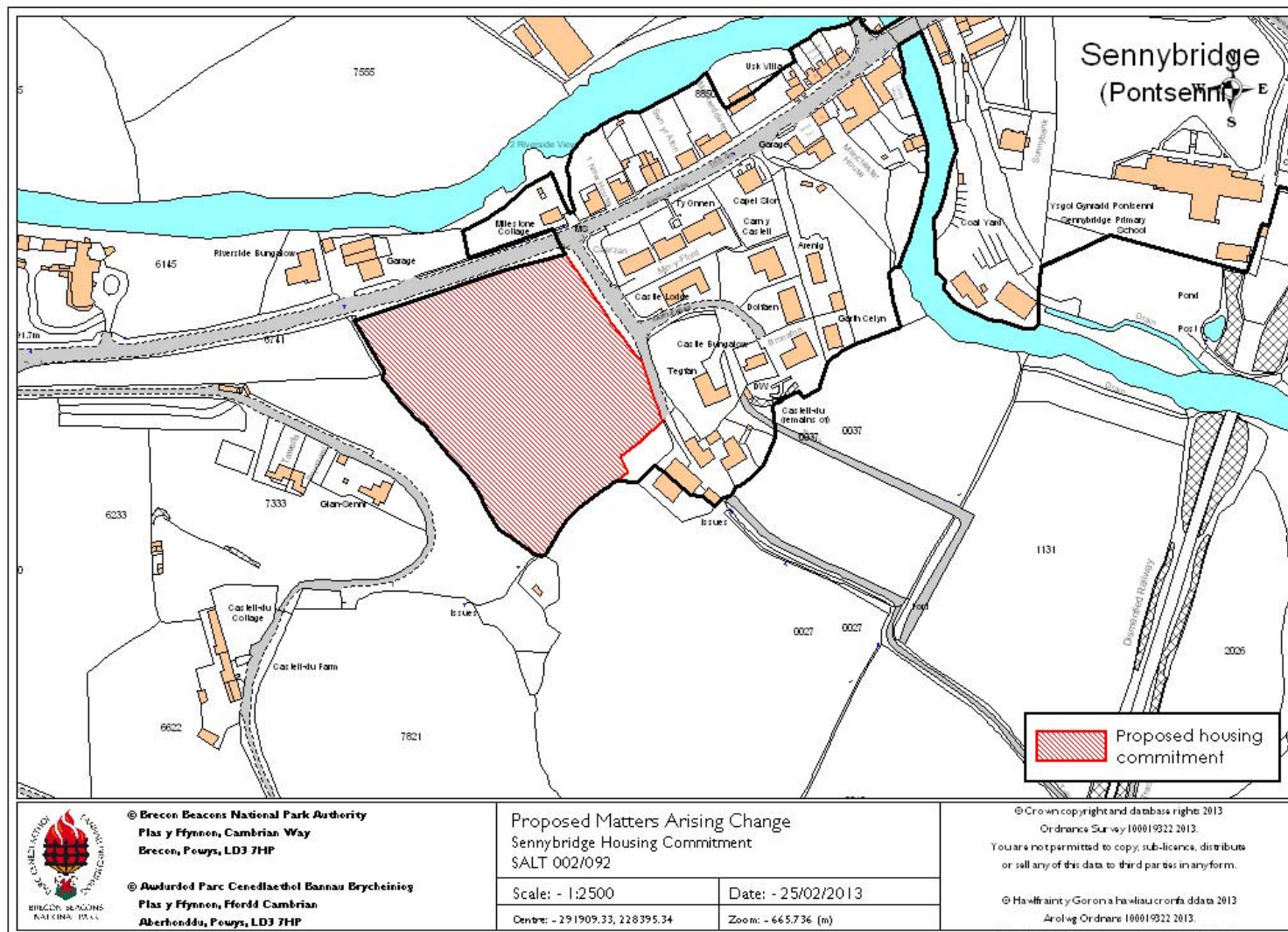
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Nid oes hysbysu i chi gopïo, unrhyw ddeddf, dosbarthu  
 neu werthu y data yma i unrhyw drydydd barid mewn unrhyw ffurf.



## **Appendix 4 (iii) – MAC-PM-4**



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**Plas y Ffynnon, Ffordd Cambrian**  
**Aberhonddu, Powys, LD3 7HP**

Proposed Matters Arising Change  
**Sennybridge Housing Commitment**  
 SALT 002/092

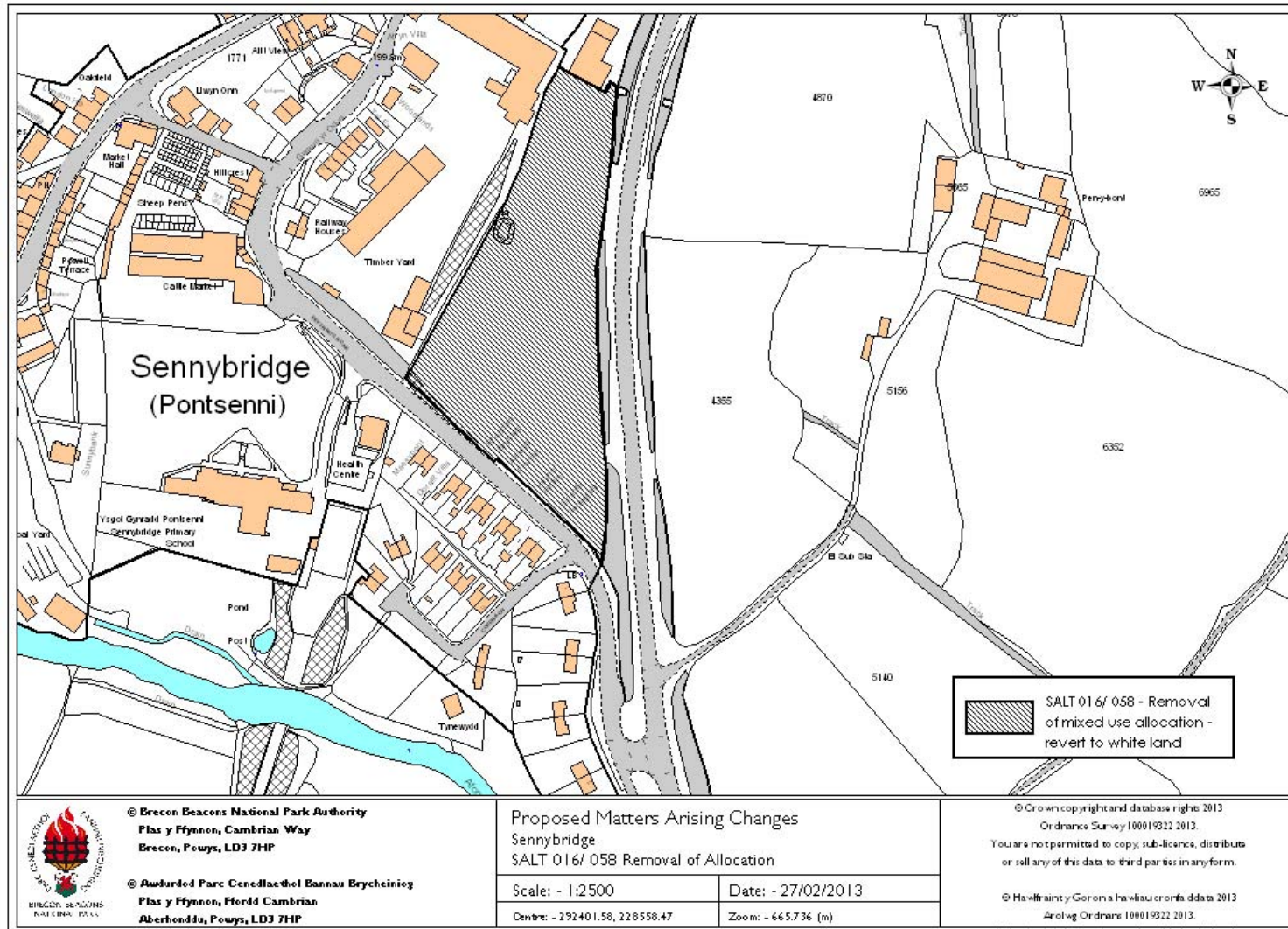
Scale: - 1:2500	Date: - 25/02/2013
Centre: - 291909.33, 228395.34	Zoom: - 645.736 (m)

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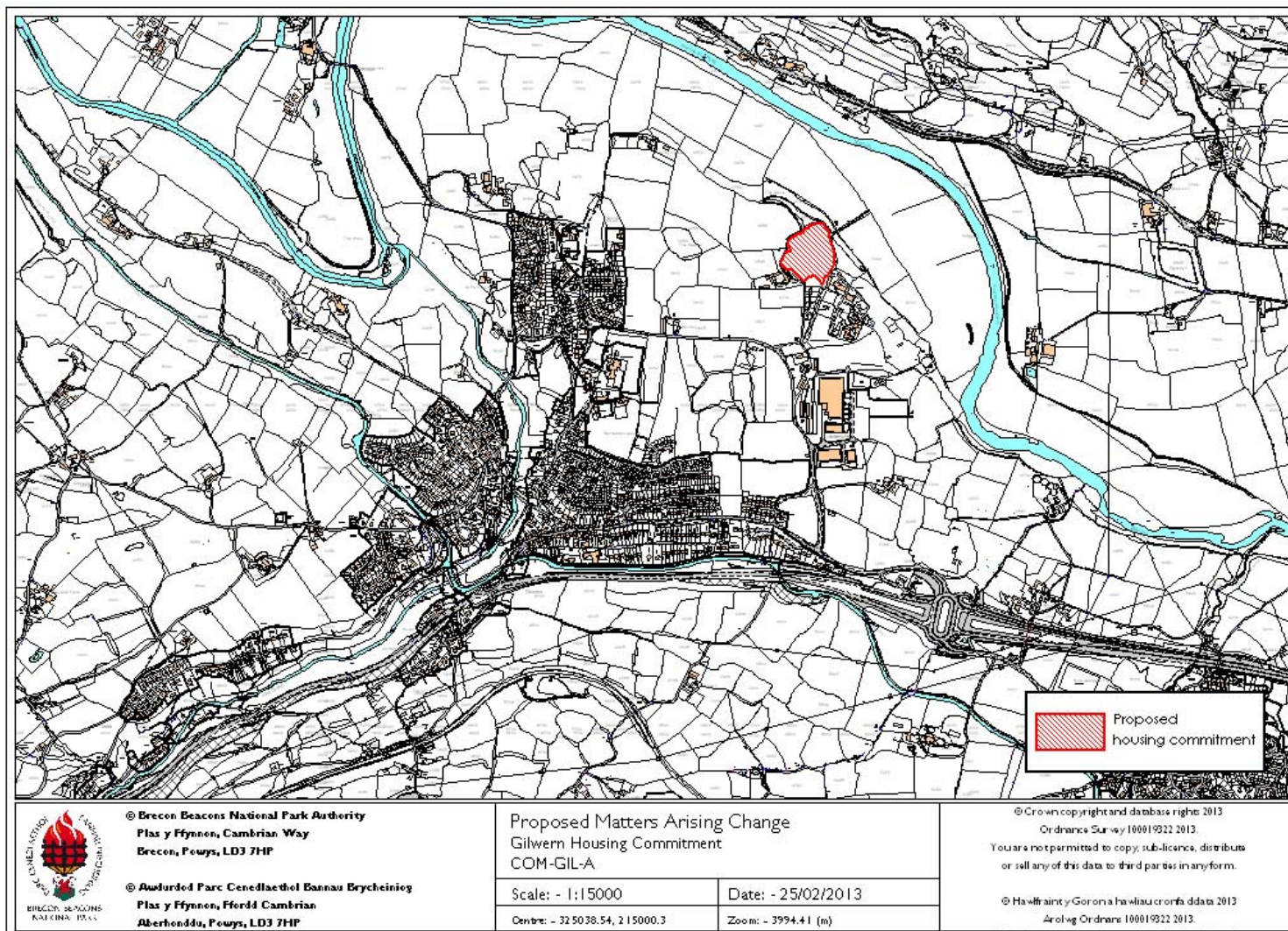
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 Arolwg Ordnans 100019222 2013.

Ni chawsom i chi gopio, trwy ddyddiedu, dosbarthu  
 neu werthu y data yma i unrhyw drydydd barth mewn unrhyw ffurf.

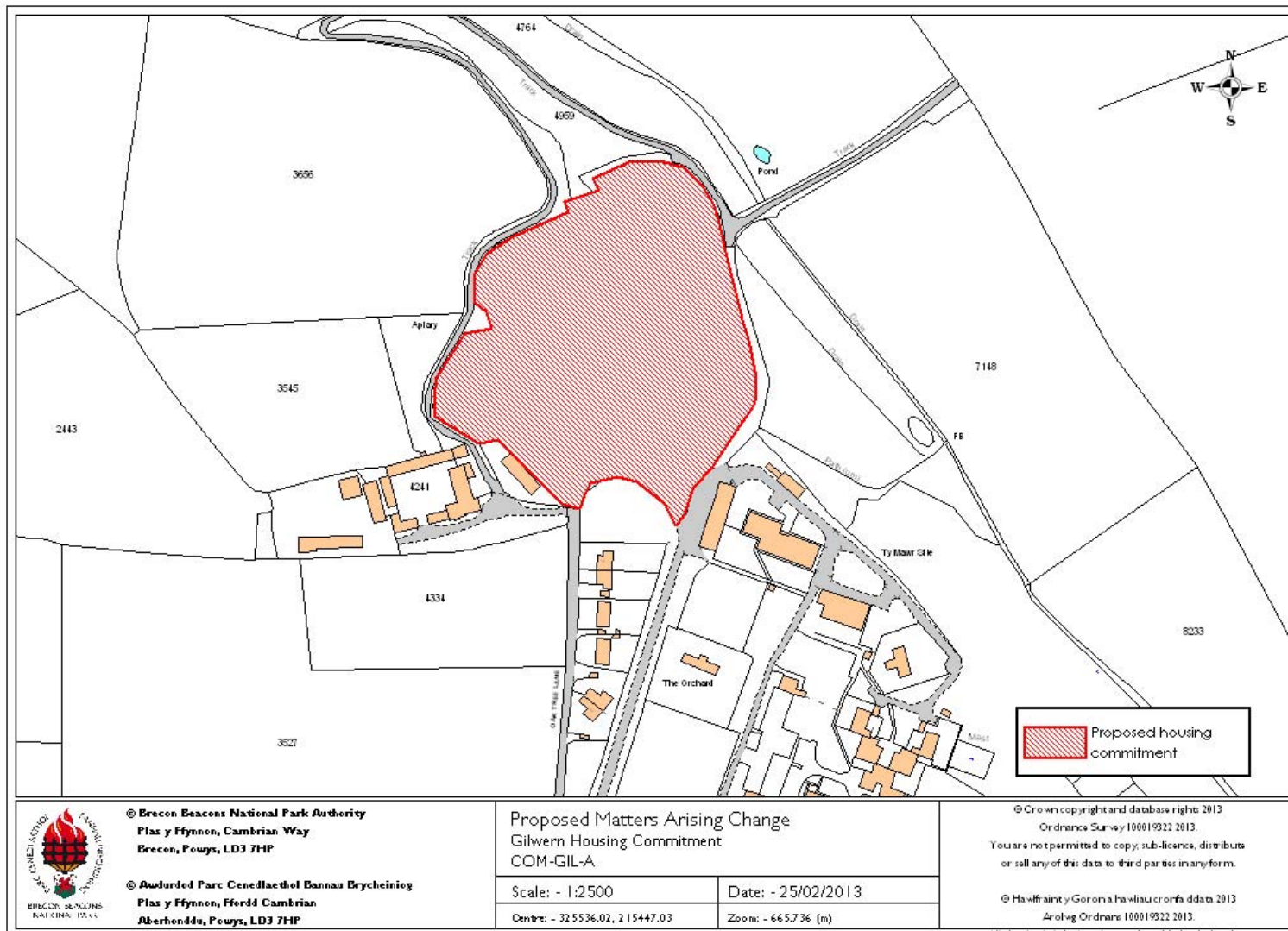
## **Appendix 4 (iv) – MAC-PM-4**



## **Appendix 5 (i) – MAC-PM-5**

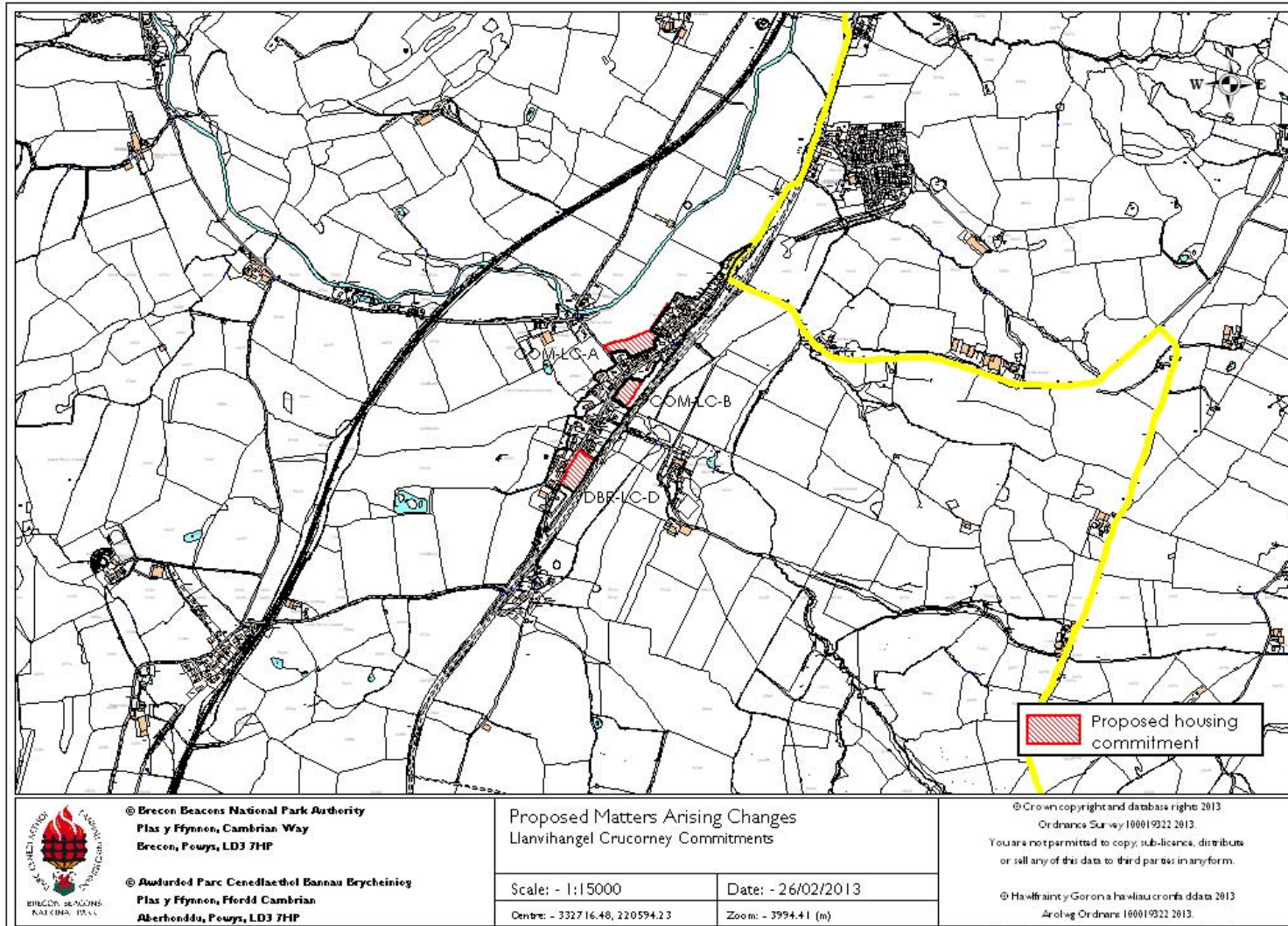



## **Appendix 5 (ii) – MAC-PM-5**





## **Appendix 6 (i) – MAC-PM-6**

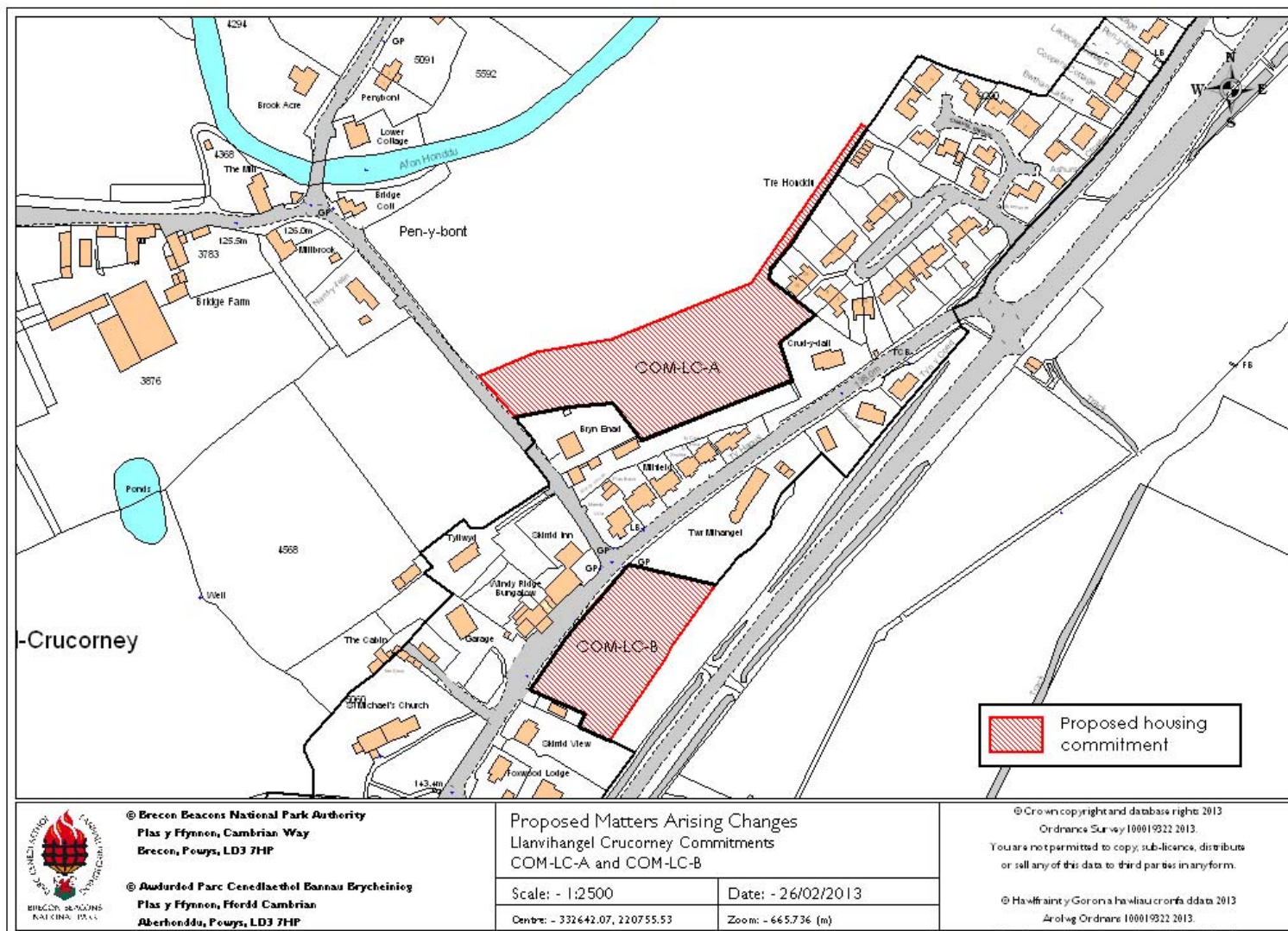



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 Brecon, Powys, LD3 7HP  
  
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 Plas y Ffynnon, Ffordd Cambrian  
 Aberhonddu, Powys, LD3 7HP

Proposed Matters Arising Changes  
 Llanvihangel Crucorney Commitments  
  
 Scale: - 1:15000      Date: - 26/02/2013  
 Centre: - 3327 16.48, 220594.23      Zoom: - 3994.41 (m)

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 Ni chawsuon i chi wneud neu ddarparu'r data hon i unrhyw  
 neu werthu y data yma i unrhyw drydydd barth mewn unrhyw ffurf.

## **Appendix 6 (ii) – MAC-PM-6**



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 Brecon, Powys, LD3 7HP

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 Plas y Ffynnon, Ffordd Cambrian  
 Aberhonddu, Powys, LD3 7HP

Proposed Matters Arising Changes  
 Llanvihangel Crucorney Commitments  
 COM-LC-A and COM-LC-B

Scale: - 1:2500

Date: - 26/02/2013

Centre: - 332642.07, 220755.53

Zoom: - 665.736 (m)

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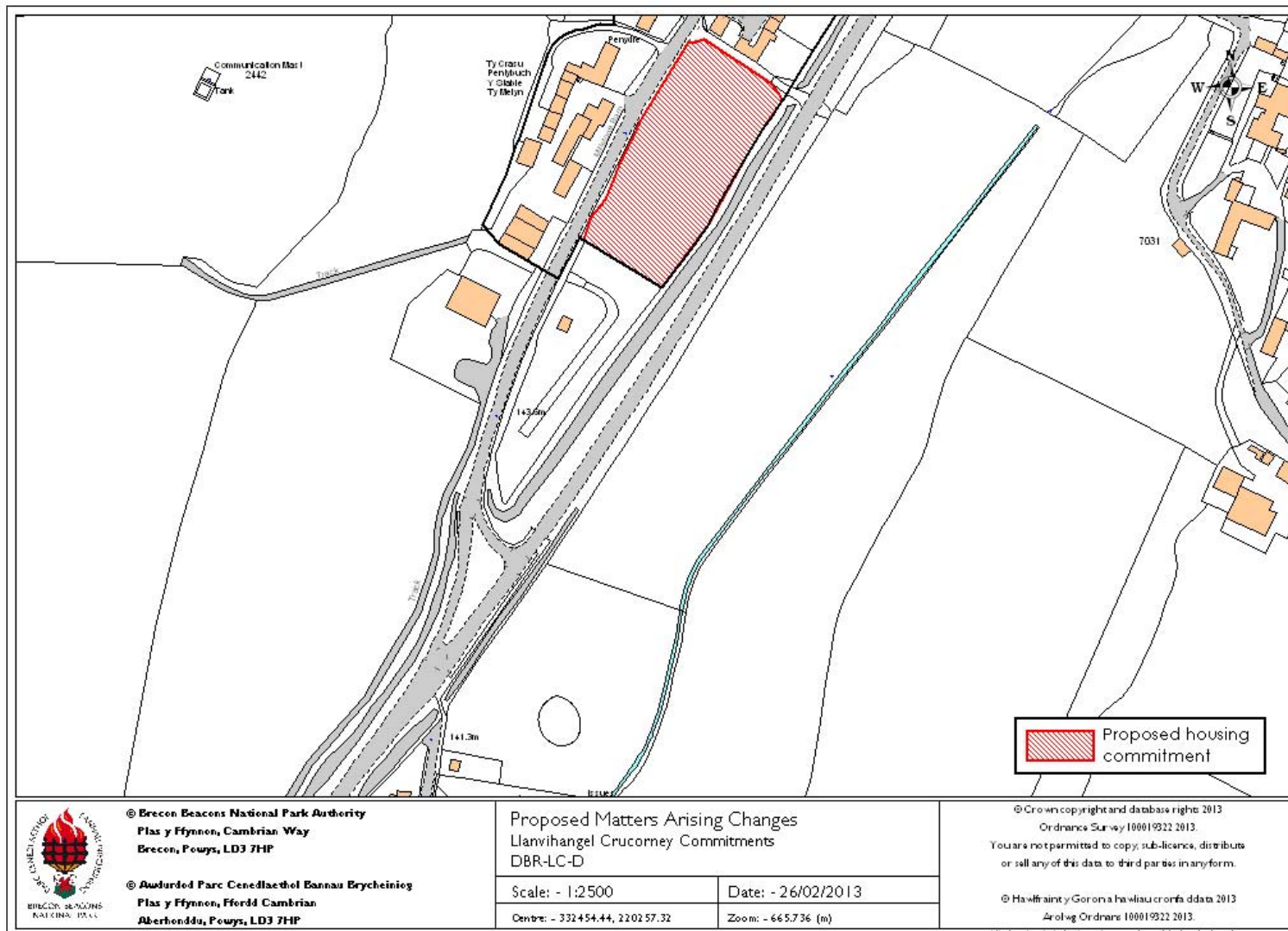
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## **Appendix 6 (iii) – MAC-PM-6**



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 Brecon, Powys, LD3 7HP

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 Aberhonddu, Powys, LD3 7HP

Proposed Matters Arising Changes  
 Llanvihangel Crucorney Commitments  
 DBR-LC-D

Scale: - 1:2500

Date: - 26/02/2013

Centre: - 332454.44, 220257.32

Zoom: - 665.736 (m)

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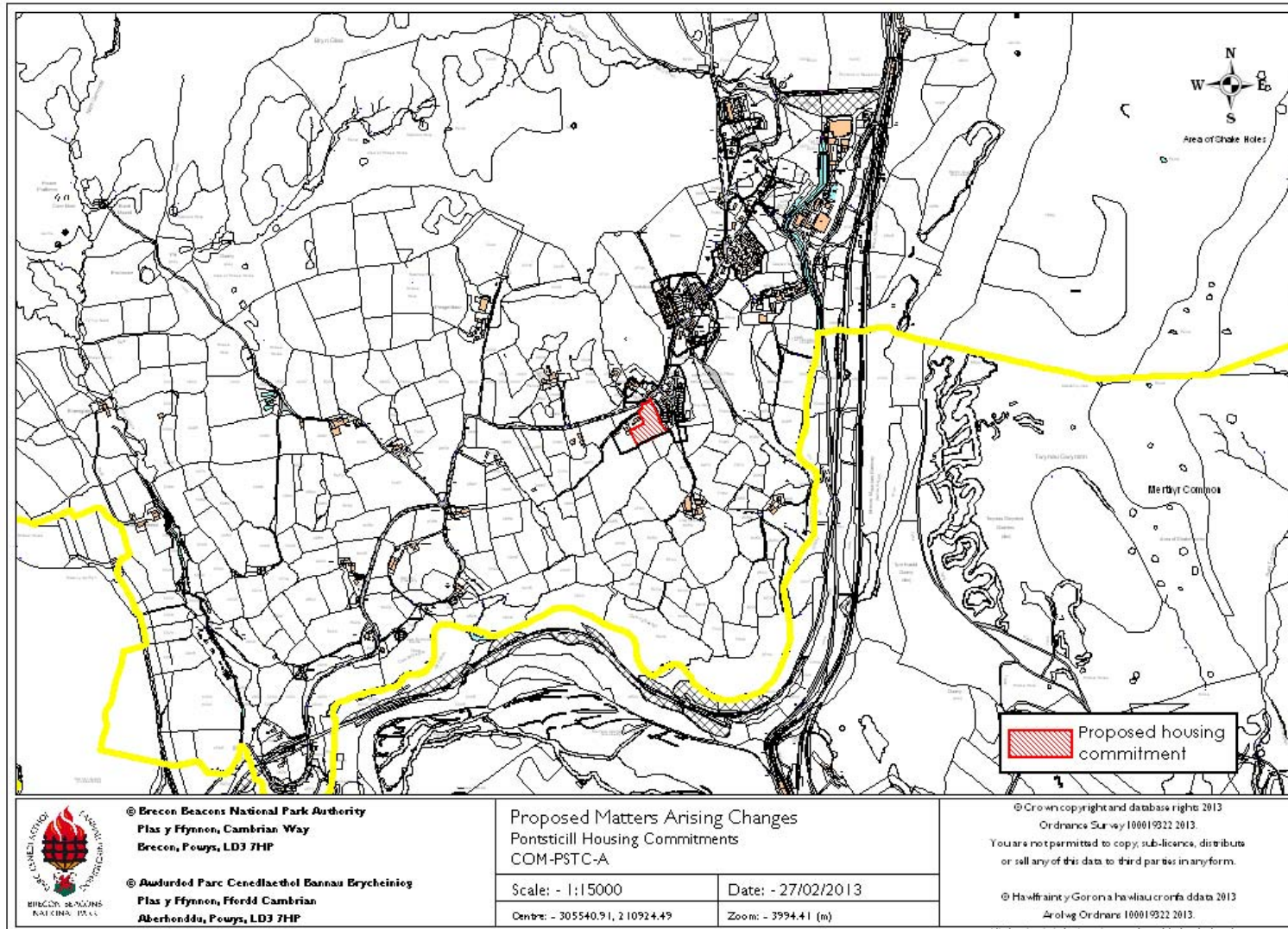
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 neu werthu y data yma i unrhyw drydydd bar o me'n unrhyw ffurf

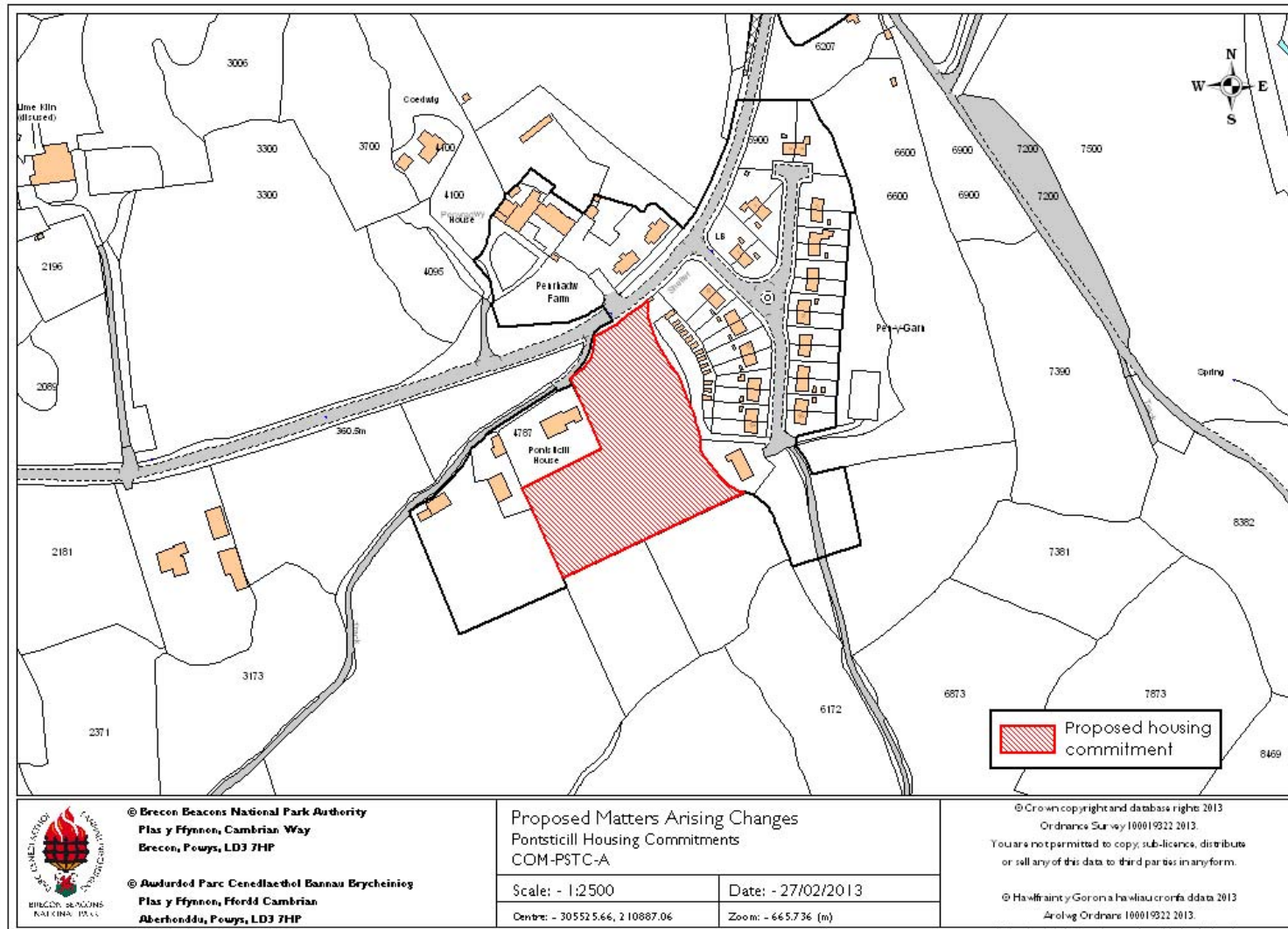
## **Appendix 7 (i) – MAC-PM-7**



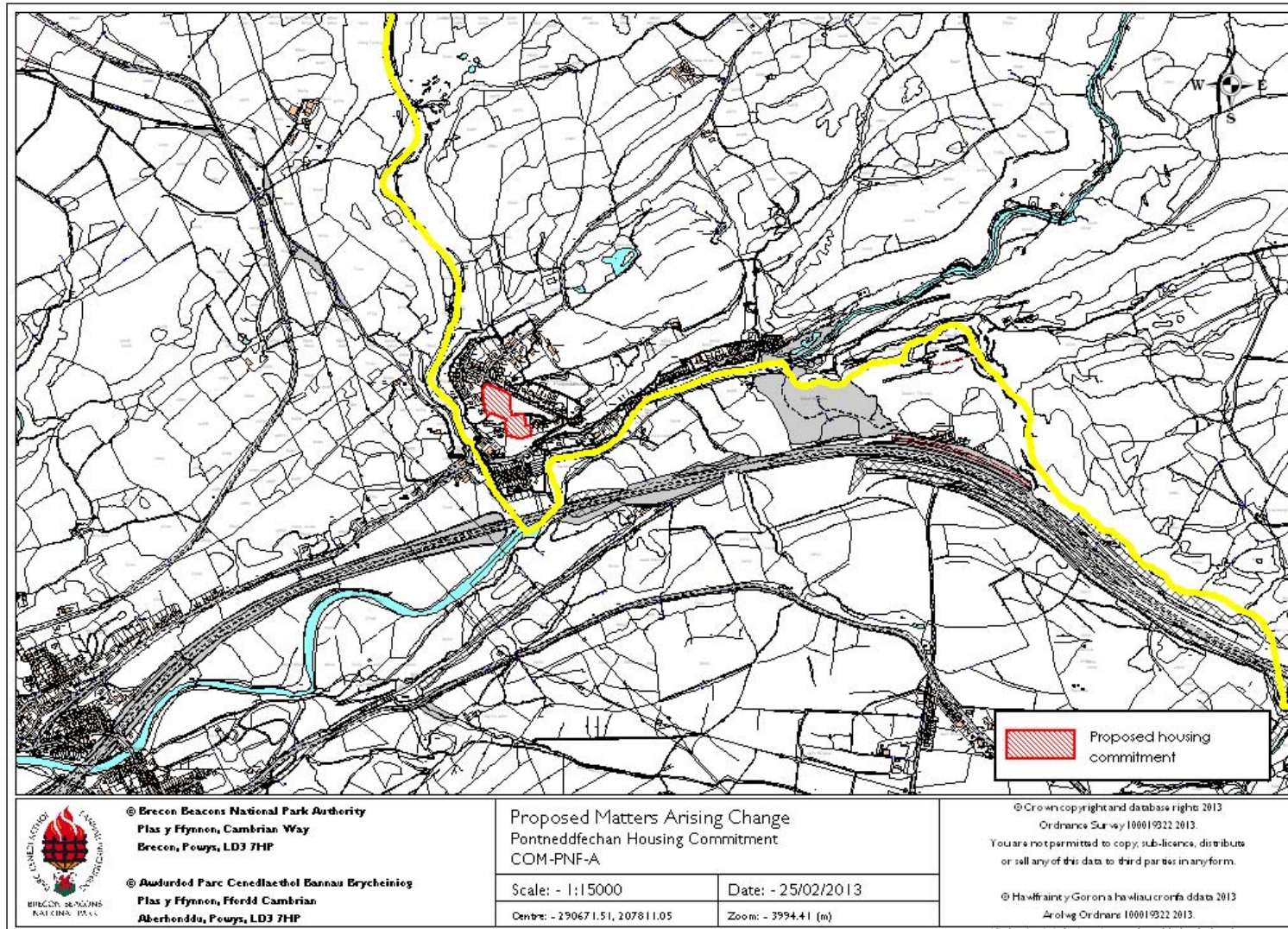
 <p>© Brecon Beacons National Park Authority                  Plas y Ffynnon, Cambrian Way                  Brecon, Powys, LD3 7HP</p> <p>© Awdurdod Parc Cenedlaethol Bannau Brycheiniog                  Plas y Ffynnon, Ffordd Cambrian                  Aberhonddu, Powys, LD3 7HP</p>	<p>Proposed Matters Arising Changes                  Pontsticill Housing Commitments                  COM-PSTC-A</p>		<p>© Crown copyright and database rights 2013                  Ordnance Survey 100019322 2013.                  You are not permitted to copy, sub-licence, distribute                  or sell any of this data to third parties in any form.</p> <p>© Hawffraint y Goron a haeliau cronfa ddata 2013                  Arolwg Ordnance 100019322 2013.                  Ni chofrestrir i chi wneud copïau neu ddiwyddeddau dosbarthu                  neu werthu y data yma i unrhyw drydydd bar o me'n unrhyw ffurf.</p>
	<p>Scale: - 1:15000</p> <p>Centre: - 305540.91, 210924.49</p>	<p>Date: - 27/02/2013</p> <p>Zoom: - 3994.41 (m)</p>	



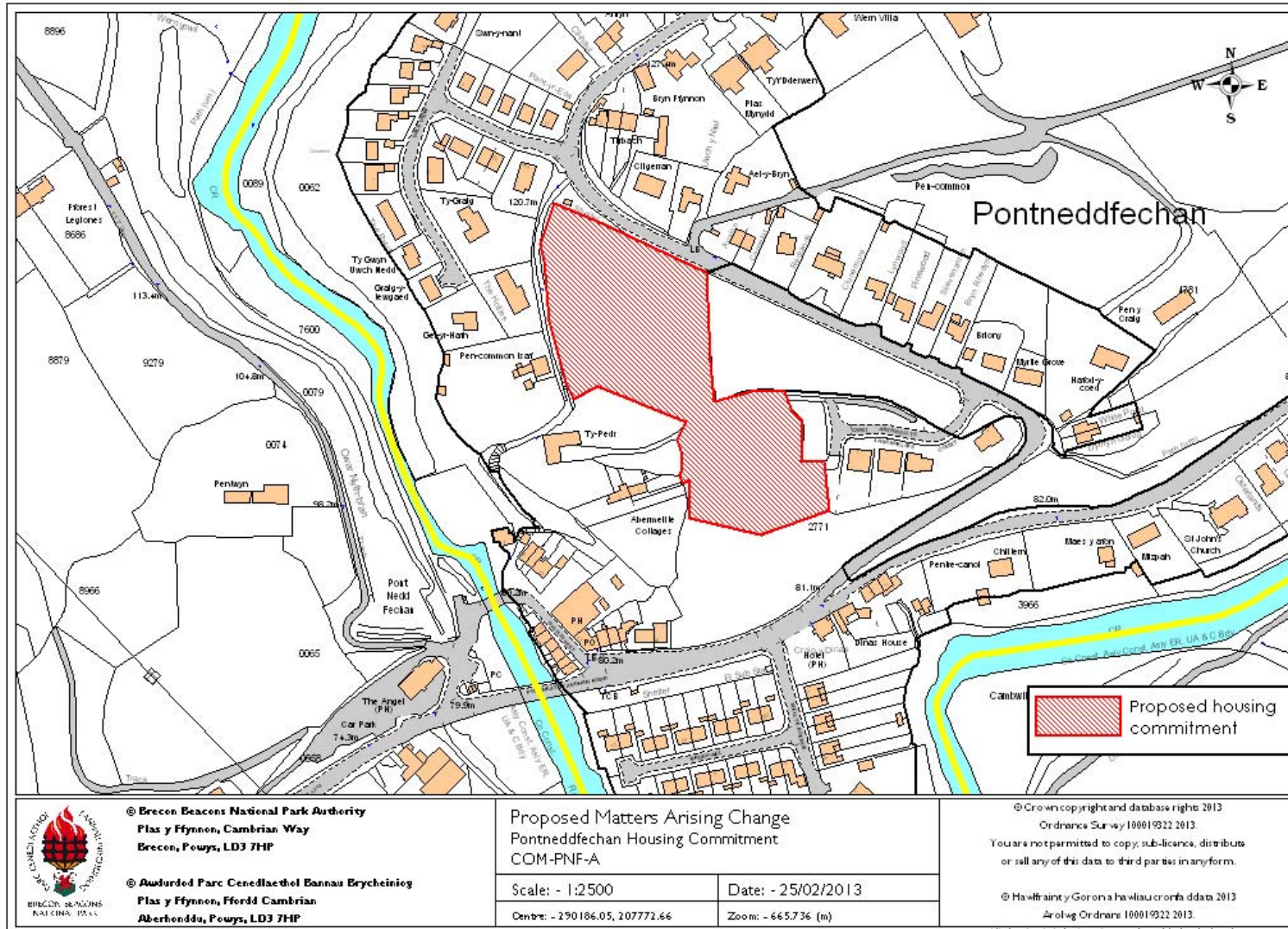
## **Appendix 7 (ii) – MAC-PM-7**



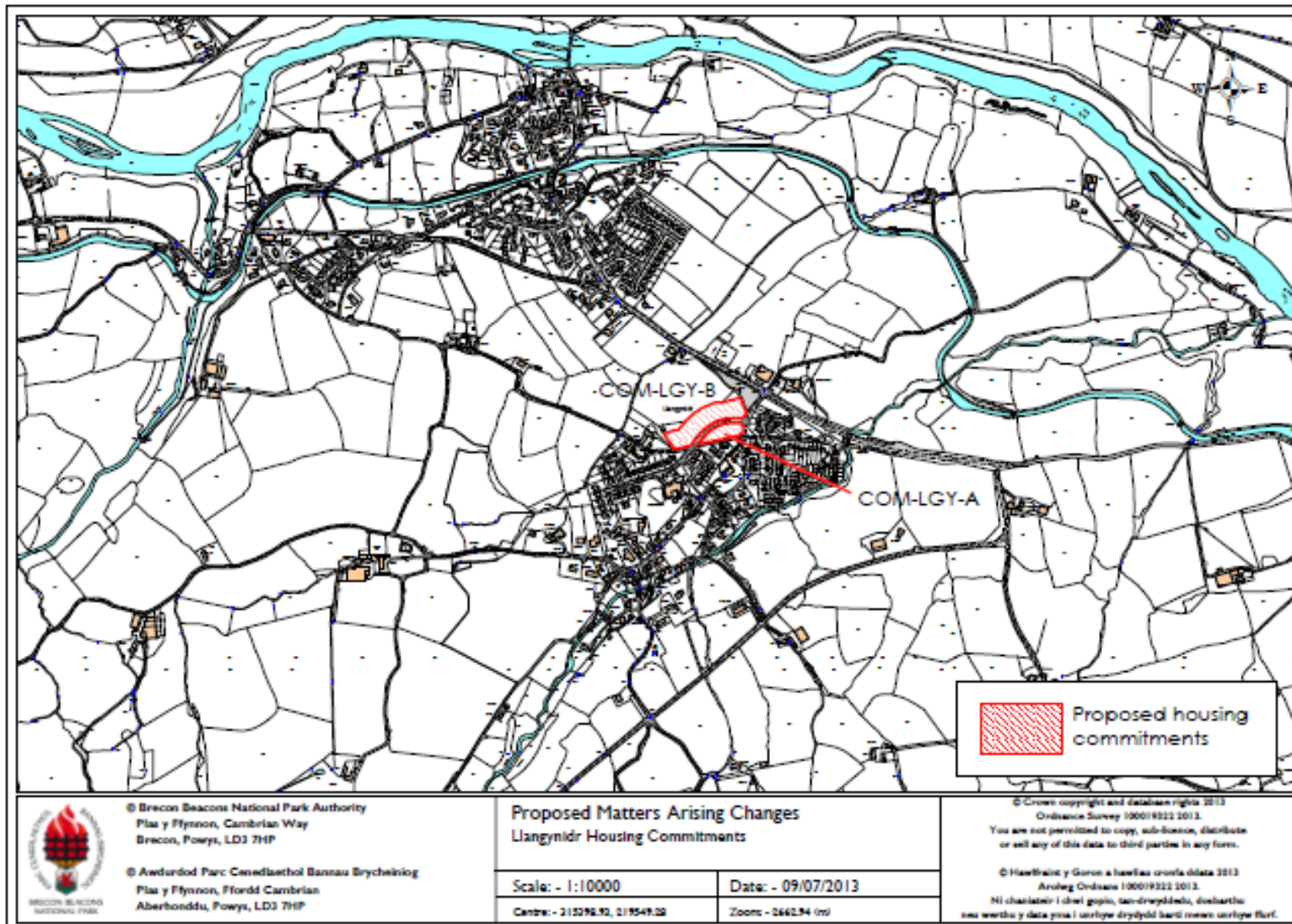
## **Appendix 8 (i) – MAC-PM-8**



## **Appendix 8 (ii) – MAC-PM-8**

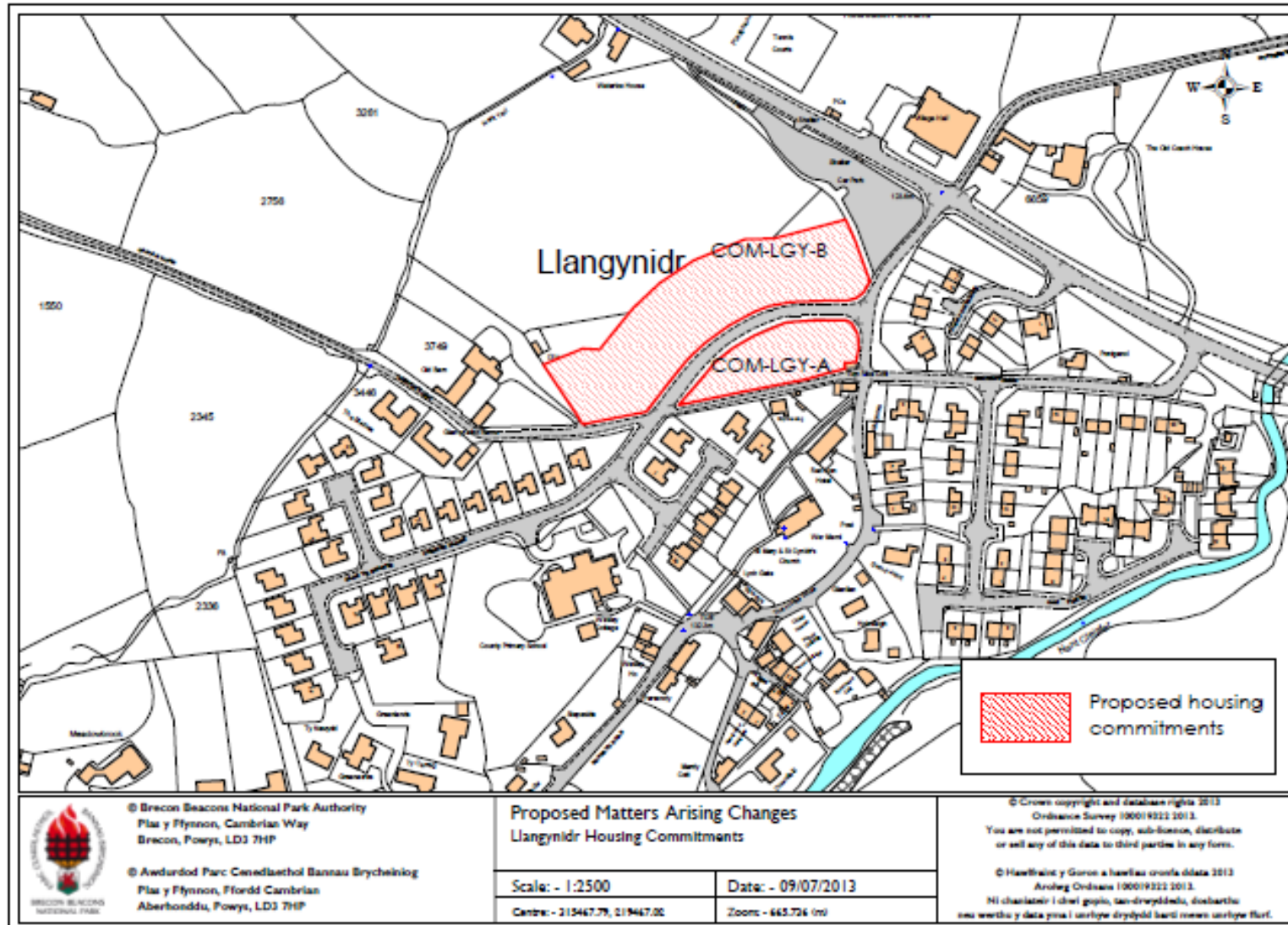


### Appendix 9 (i) – MAC-PM-9

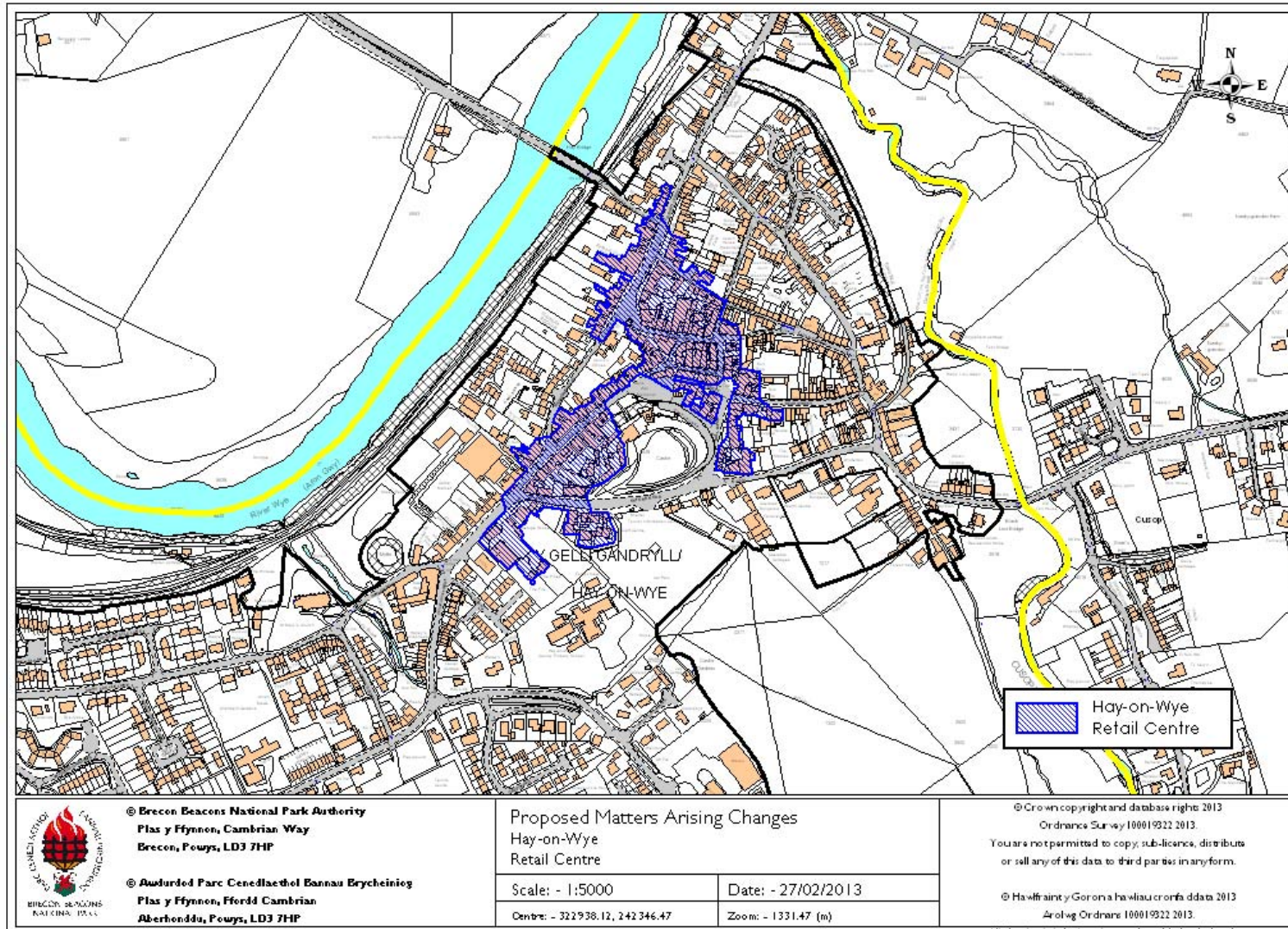


## **Appendix 9 (ii) – MAC-PM-9**





## **Appendix 10 – MAC-PM-10**



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 Brecon, Powys, LD3 7HP

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 Aberhonddu, Powys, LD3 7HP

Proposed Matters Arising Changes  
 Hay-on-Wye  
 Retail Centre

Scale: - 1:5000

Date: - 27/02/2013

Centre: - 322938.12, 242346.47

Zoom: - 1331.47 (m)

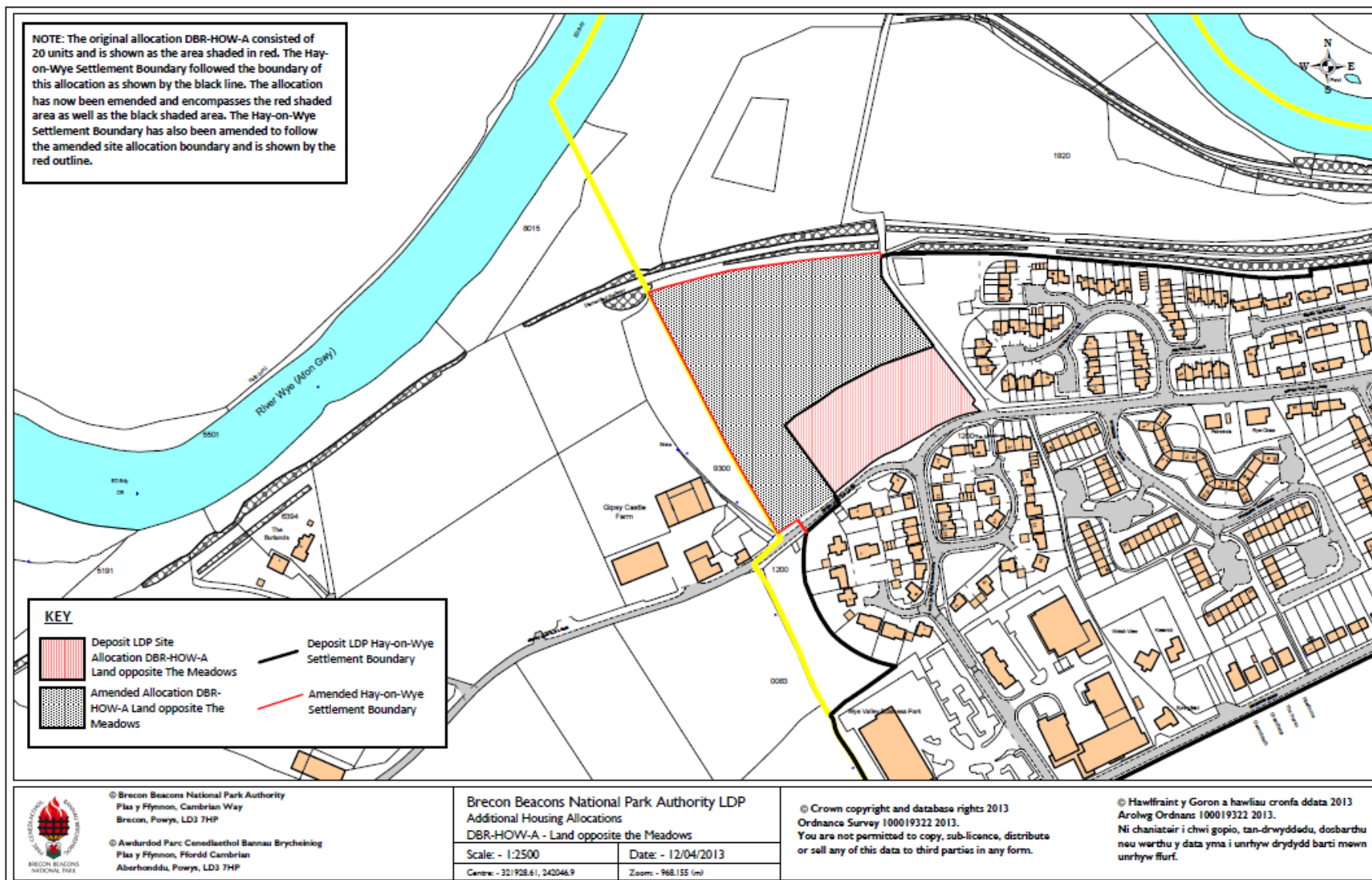
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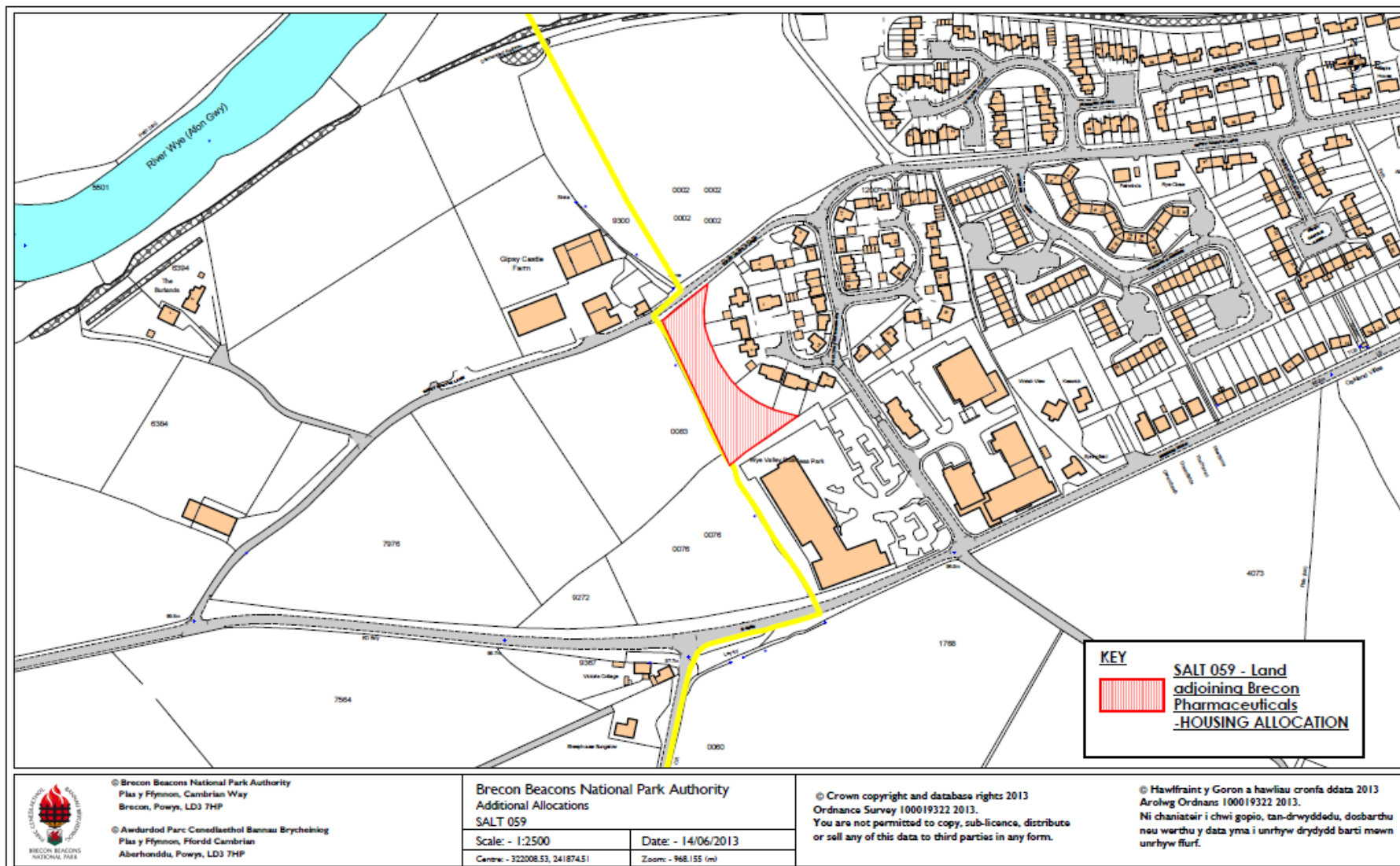
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Nid oes hysbysu i chi gopïo, unrhyw ddeddf, dosbarthu  
 neu werthu y data yma i unrhyw drydydd barid mewn unrhyw ffurf.

## **Appendix 11 – MAC-PM-11**

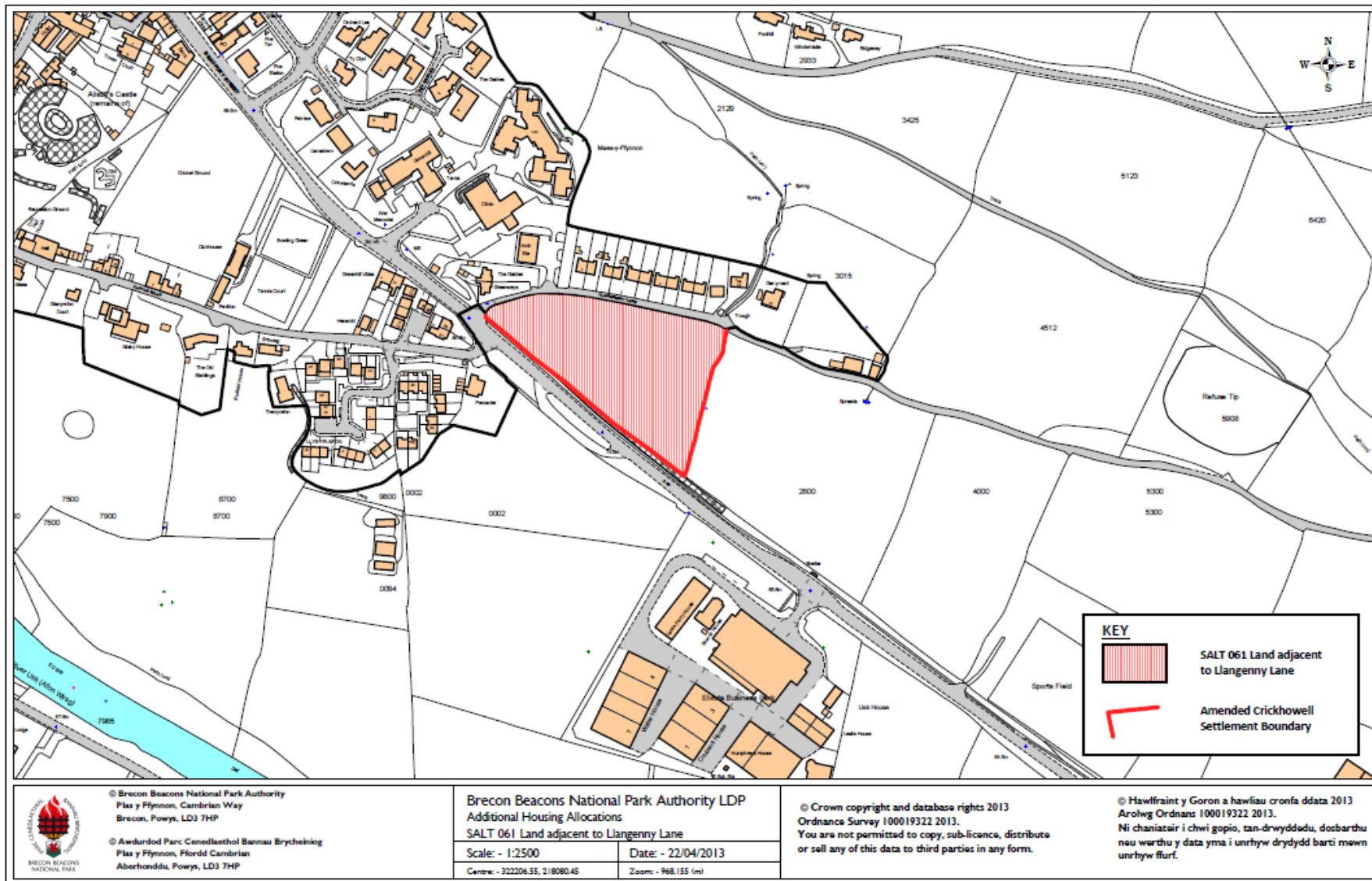


## **Appendix 12 – MAC-PM-12**

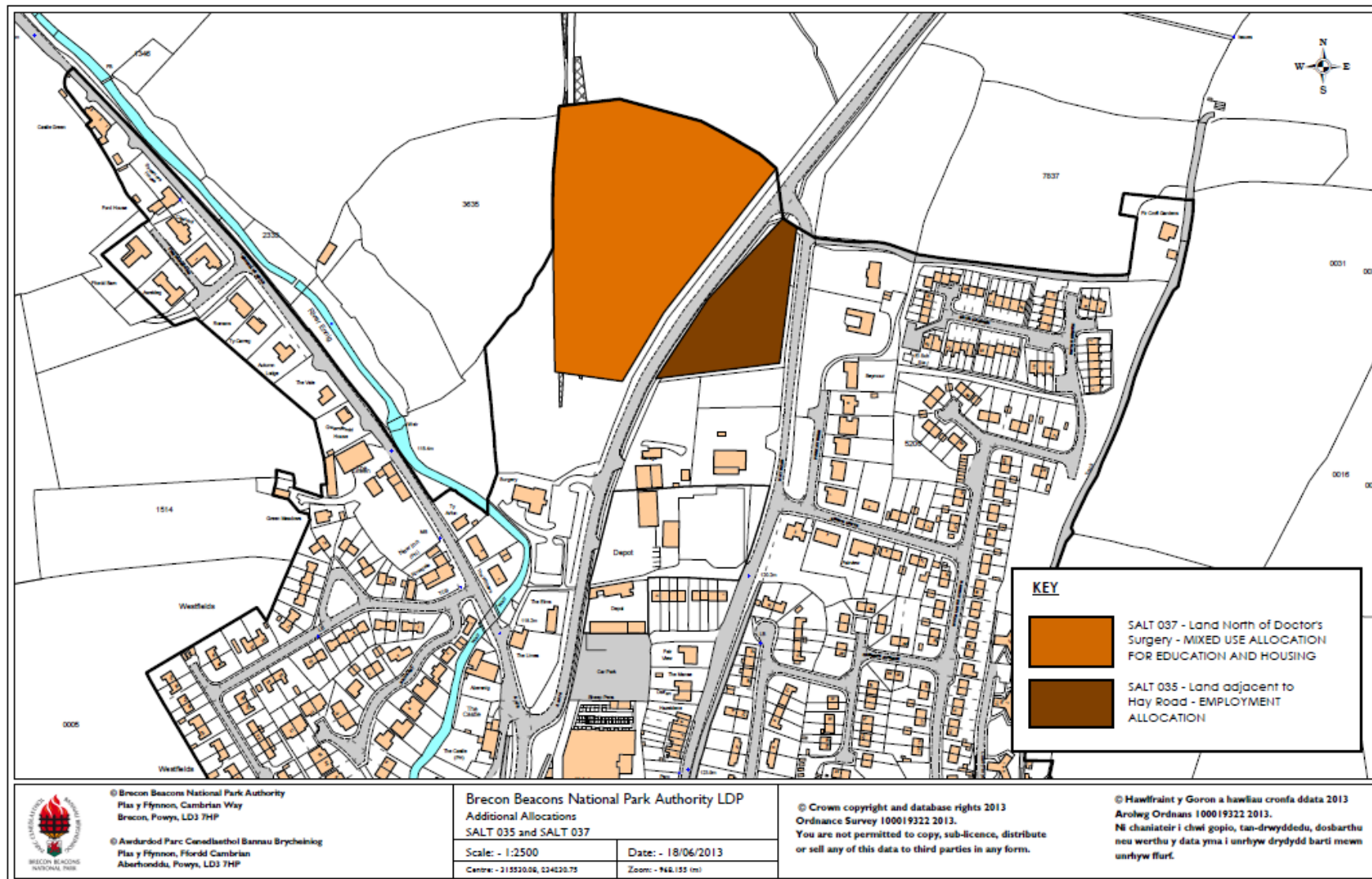


## **Appendix 13 – MAC-PM-13**

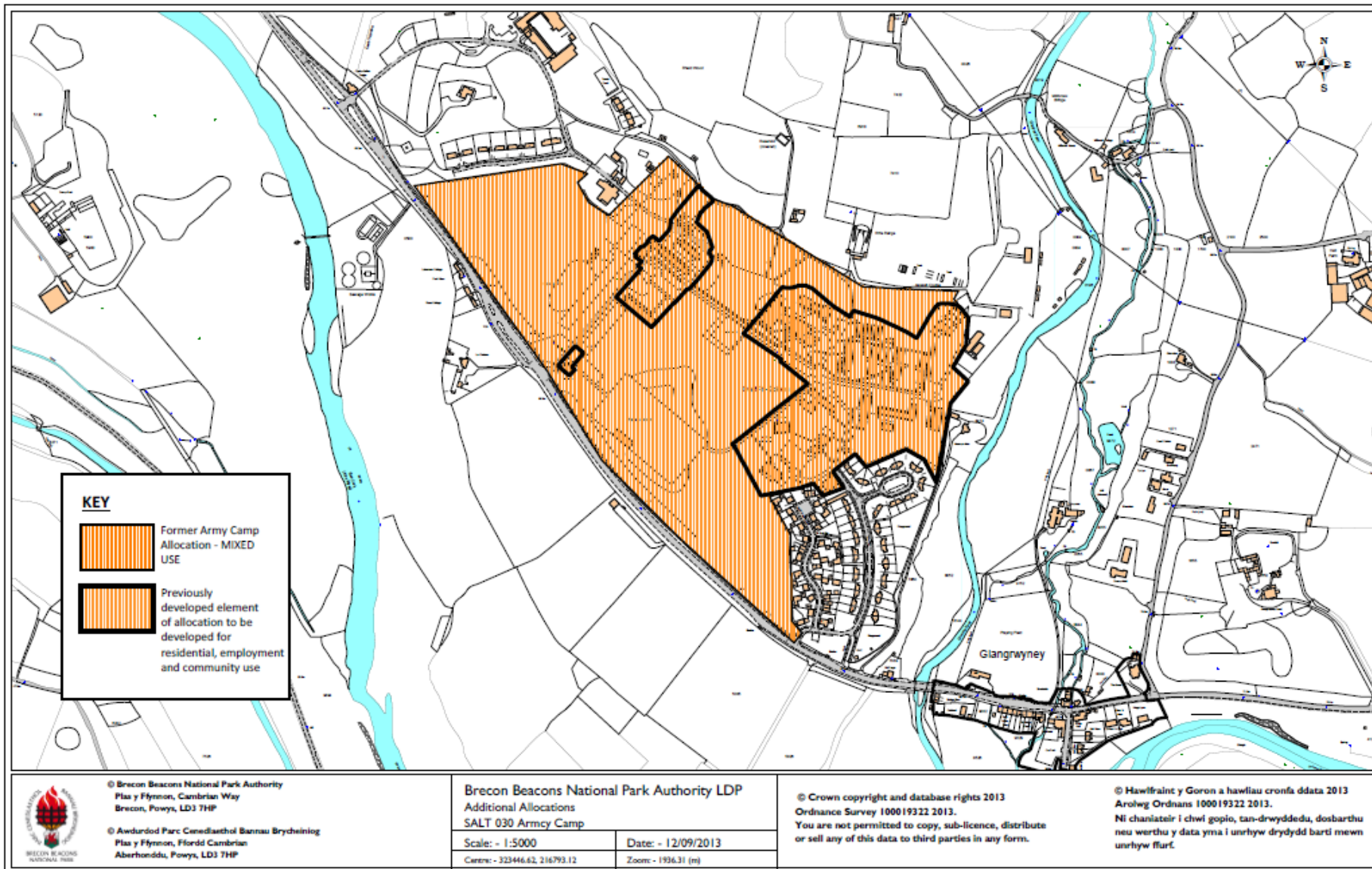




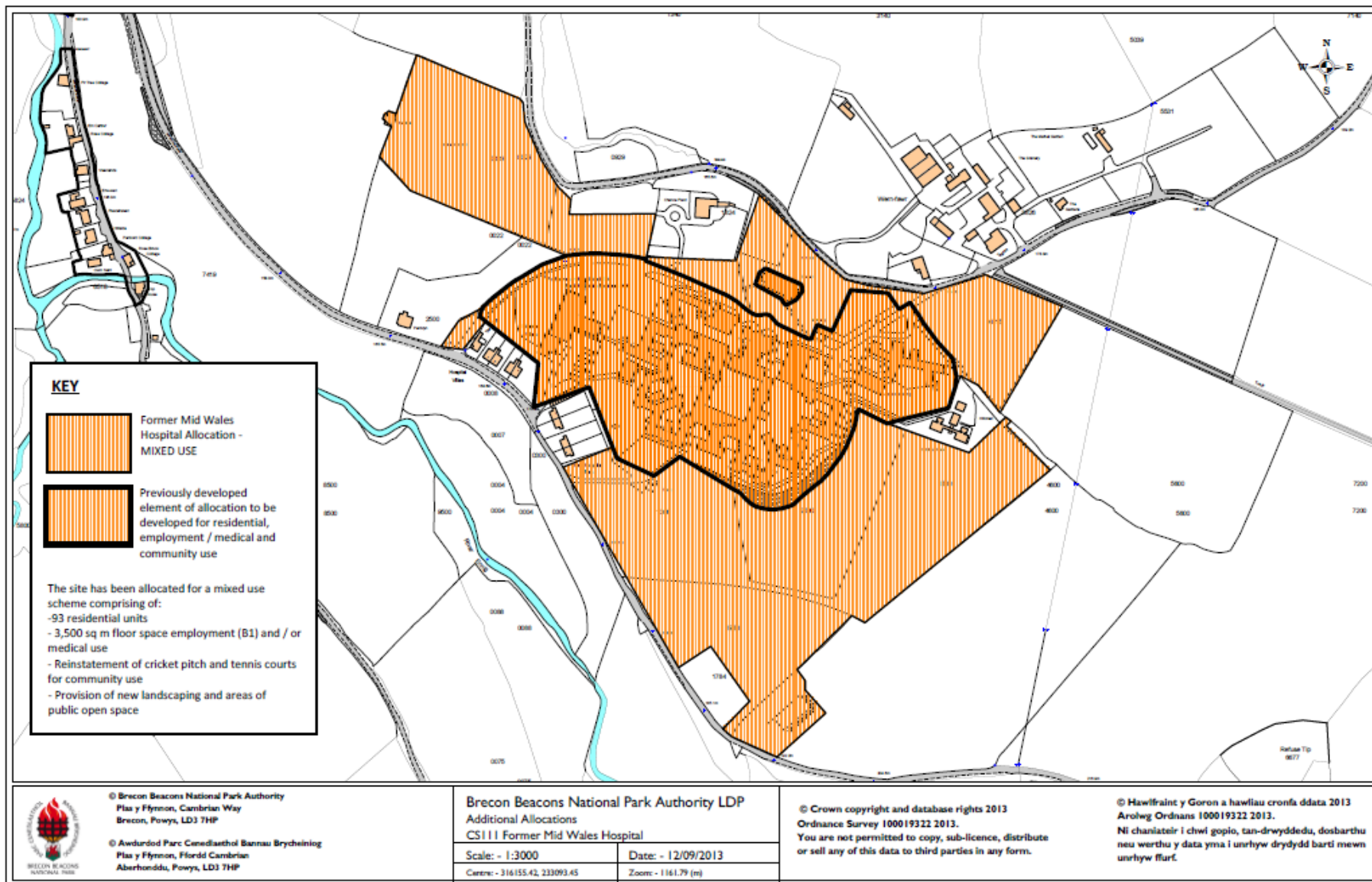
## **Appendix 14 – MAC-PM-14**



## **Appendix 15 – MAC-PM-15**

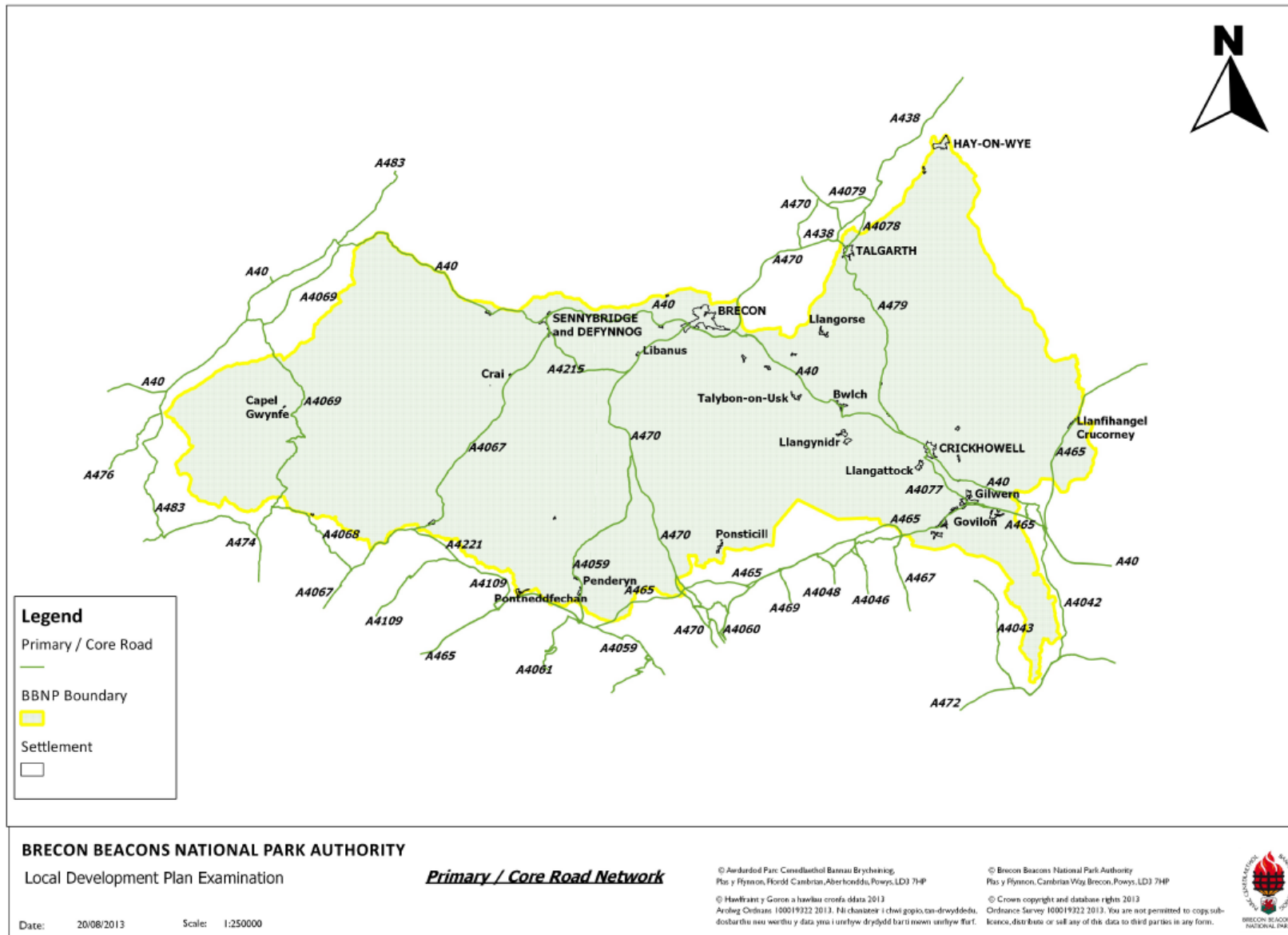


## **Appendix 16 – MAC-PM-16**

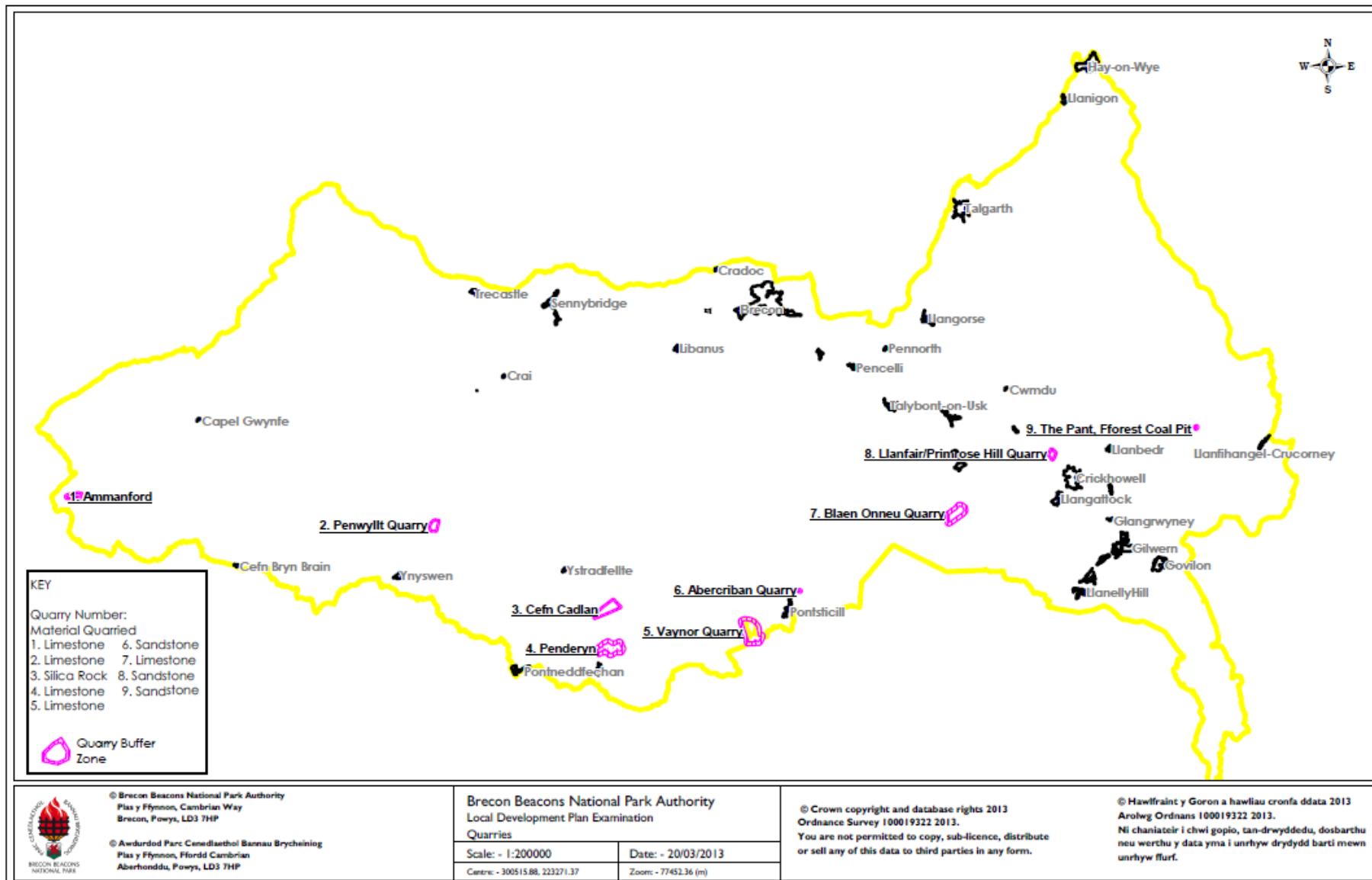


## **Appendix 17 – MAC-PM-17**

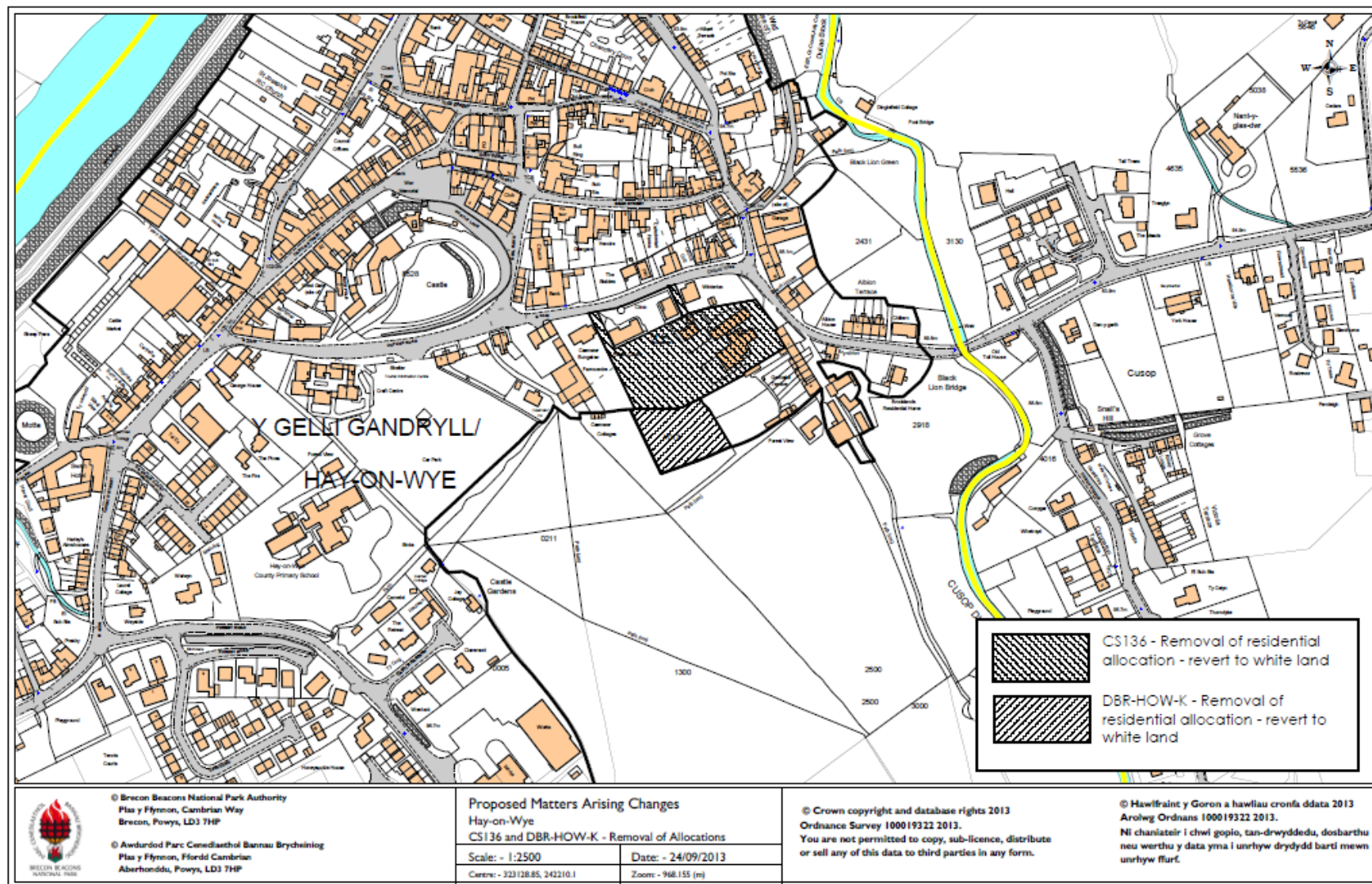




## **Appendix 18 – MAC-PM-18**



## **Appendix 19 – MAC-PM-19**



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 Aberhonddu, Powys, LD3 7HP

**Proposed Matters Arising Changes**  
 Hay-on-Wye  
 CS136 and DBR-HOW-K - Removal of Allocations

Scale: - 1:2500	Date: - 24/09/2013
Co-ords: - 323128.85, 142210.1	Zoom: - 96.155 (m)

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 Ni chaniateir i chiw gopio, tan-drwyddeda, dosbarthu  
 neu werthu y data yma i unrhyw drydydd barti mewn  
 unrhyw ffurf.

## **Appendix 20 – MAC-PM-20**

