

**Powys Local Development Plan  
Topic Paper**

**MINISTRY OF DEFENCE ESTATES  
SENNYBRIDGE TRAINING AREA**

**DEPOSIT VERSION PAPER**

**January 2015**



## **CONTENTS**

Executive summary

- 1.0 Introduction
- 2.0 Policy Context
- 3.0 The Powys Context - The Sennybridge Training Area
- 4.0 Analysis of Policy Context
- 5.0 Key Issues and Context for consideration in the LDP
- 6.0 Recommendations
- 7.0 Justification of Military Operations Policy
- 8.0 Review of UDP Policies
- 9.0 Neighbouring Authorities and Cross Border Working
- 10.0 Monitoring

## **Executive Summary**

The planning system regulates the development and use of land in the public interest. It addresses both the need for development and for conservation, securing economy, efficiency and amenity in the use of land and thereby contributing to sustainable development.

Powys County Council is the Local Planning Authority (LPA) for those areas of Powys outside the Brecon Beacons & Snowdonia National Parks which are LPAs in their own right.

The purpose of this paper is to explore Military operations in Powys and to aid the examination of the Powys Local Development Plan (LDP).<sup>1</sup> Guidance by the Planning Inspectorate<sup>2</sup> explains:

“...topic papers can provide helpful context on key issues. They should elaborate on the LDP’s supporting text to explain, as succinctly as possible, how the evidence has informed the policy and why the proposed approach is sound.”

The approach of the Powys LDP is to provide a succinct Military Operations Policy which focuses on supporting proposals by the Ministry of Defence (MOD) for development within the Sennybridge Training Area and elsewhere in Powys where the MOD are sustaining the use of an existing facility.

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<sup>1</sup> Powys LDP 2011 – 2016, Deposit Draft (July 2014)

<sup>2</sup> Para 22. PINS. LDP’s: Preparing for submission Guidance for Local Planning Authorities (July 2014)

## **1.0 Introduction**

1.1 This topic paper addresses the issue of development on Crown Land and in particular considers the land use implications of the Sennybridge Training Area (SENTA) on the Epynt, which is managed currently by the Ministry of Defence (MOD) Estates department.

## **2.0. Policy context**

2.1 Crown immunity from planning provisions was removed on 7th June 2006 when Chapter 1 of Part 7 of the Planning and Compulsory Purchase Act 2004 was implemented. Part 7 applies the planning Acts to the Crown, which will, in general, have to apply for planning permission for development in a similar manner to other applicants and ensure full compliance with the Environmental Impact Assessment Directive.

2.2 On 7 June 2006, the Crown was fully integrated into the planning system by making the Crown compliant with the following acts:

- Town and Country Planning Act 1990
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning (Hazardous Substances) Act 1990

2.3 Prior to 7 June 2006, the Crown was exempt from planning legislation, but followed a quasi-statutory procedure for applying for planning and listed building clearance under DoE Circular 18/84 Crown Land and Crown Development and WO Circular 37/84.

2.4 Crown development which had previously been agreed or determined by the Secretary of State (SoS) following a Notice of Proposed Development (Circular 18/84 Notification, WO 37/84) is treated as if it had planning permission (or Listed Building Consent (LBC) as appropriate).

2.5 For the major part, the Crown now requires planning permission, conservation area consent, and listed building consent in the same manner as private organizations and individuals. There are some special arrangements, mainly concerned with national security and defence, urgency and enforcement, together with new permitted development rights and use classes.

- 2.6 Although the reforms have removed the Crown's immunity from the Planning Acts, the Crown remains immune from the provisions of the Ancient Monuments & Archaeological Areas Act 1979. Where proposed Crown development would affect an ancient monument scheduled under the provisions of the Ancient Monuments and Archaeological Areas Act 1979, the developing Crown body is to notify the Assembly Government (Cadw). Works affecting a scheduled ancient monument should not commence until Cadw has issued a letter to the developing Crown body granting scheduled monument clearance.
- 2.7 The removal of Crown immunity places the position of the Crown on a statutory basis ensuring full compliance with the Environmental Impact Assessment Directive, although provision for case-by case exemption on specific application to the DCLG (or devolved administration) remains. Normally the MOD must undertake Environmental Impact Assessments (EIAs) and submit Environmental Statements (ES) with planning applications for most large scale developments or developments which might significantly affect the environment.
- 2.8 The Crown however still enjoys certain exemptions and special arrangements, mainly concerned with national security and defence, urgency and enforcement, together with new permitted development rights and use classes still exist.
- 2.9 For further information regarding the removal of Crown immunity from planning provisions, the DCLG Circular 02/2006 "Crown Application of the Planning Acts", provides detailed guidance on the changes for England and equivalent guidance for Wales is provided in the Welsh Assembly letter and Memorandum dated 7" June 2006.  
<http://wales.gov.uk/docs/desh/publications/060607crownapplicationen.pdf>  
<http://wales.gov.uk/docs/desh/publications/060607memorandumen.pdf>  
Items as outlined in the letter and memorandum are summarised below:

## **2.10 National Security**

- 2.11 When making an application under the Planning Acts or an application for planning consent under the hazardous substances Act, publicity will normally be given to developments proposed by MOD in the same way as to developments by private individuals and organisations. Exceptionally however, the MOD may be prevented on national security grounds from disclosing some of the details of the development.

- 2.12 This may lead to the LPA deciding that it lacks the information necessary to make an informed determination such that it either has to refuse the application or fail to determine it.
- 2.13 In appealing against a refusal or non-determination in such cases, the MOD can request that the SoS DCLG (or devolved administration) gives a Section 321 Direction under the Town and Country Planning Act. This will have the effect of restricting the hearing or examination of sensitive evidence to particular individuals because it would not be in the national interest for such evidence to be disclosed to the general public.
- 2.14 If no Direction is given, the MOD must either allow the sensitive information to be released and inspected or withdraw the application. If a Section 321 Direction is made, a "Special Advocate" will be appointed to represent all those parties who are prevented from inspecting evidence at the ensuing inquiry and will be responsible for submitting representations on their behalf. The Special Advocate or Representative is usually funded by the MOD.
- 2.15 If the MOD is aware from the outset that the LPA will not have sufficient information to determine a planning application and the application involves matters of national security then the MOD can request that the SoS DCLG issues a Direction to call in the application for determination.
- 2.16 The MOD may also request a Direction is given if it is objecting to a planning application made by a third party where the proposed development might interfere with a sensitive site.

### **2.17 Defence (EIA) Exemption Direction**

- 2.18 Where an application requires a request for a Section 321 Direction, it is likely that there will be a similar requirement for a Defence (EIA) Exemption Direction from the statutory requirement to undertake an EIA (if one is required for the proposed development).
- 2.19 Although a Defence (EIA) Exemption Direction can also be applied to an application that does not require a security Direction, this exemption is only applicable where it is clearly judged in the particular circumstances of the case that undertaking an EIA and submitting an ES would have an adverse effect on national defence purposes e.g. release of information relating to classified processes and procedures.
- 2.20 This exemption can only be exercised if authorised by both the SoS for Defence and SoS DCLG. The resulting Defence (EIA) Exemption Direction

will be sent to the relevant LPA and discharge the EIA legislative requirement.

## **2.21 Urgent Development or Works Applications**

2.22 MOD planning applications will normally be made with sufficient lead time for a LPA to consider and make a determination within the appropriate statutory deadline. However, where development or works are considered to be especially urgent such that the LPA cannot be given the normal period to make a determination, there is an option to invoke the urgent application procedure available under Section 293a of the Planning and Compulsory Purchase Act 2004.

2.23 To invoke the procedure, MOD must be able to certify at Ministerial level that the development is:

- i) of national importance; and
- ii) carried out as a matter of urgency

and if able to certify the above then it is able to make a planning application direct to the SoS or devolved administration (rather than the LPA) after having advertised the intention to do so in at least one local newspaper.

## **2.24 Enforcement**

2.25 LPAs are now able to serve a notice or make an order (other than a Court Order) intended to enforce compliance of a planning requirement on MOD land. It should be noted that such enforcement proceedings can relate to land which the MOD has an interest in even though it may be owned by another or owned by the MOD and occupied by a third party.

2.26 However, LPAs are unable to enter MOD land for any purposes connected with the making or enforcing of any such notice or order without first securing the consent of the MOD.

## **2.27 Trees**

2.28 Tree Preservation Orders (TPOs) can be made on MOD land and where protected by a TPO, works to a tree will only be exempt from LPA consent if this is urgently necessary for national security purposes.

## **2.29 Permitted Development Rights for Operational Crown Land**

2.30 Crown Bodies have additional permitted development rights to enable them to carry out certain development without requiring a planning application to be made. These are set out in Parts 34 to 38 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (SI 1995/418).

There are permitted development rights in relation to the following types of development (with various restrictions, conditions and qualifications):

- Certain types of development by the Crown (Part 34)
- Aviation development by the Crown (Part 35)
- Crown railways, dockyards (etc.) and lighthouses (Part 36)
- Emergency development by the Crown (Part 37)
- Development for national security purposes (Part 38)

Permitted development rights are given as it would be unreasonable and inefficient to require planning permission for a range of small scale developments.

2.31 Permitted development rights allow for the construction, maintenance, improvement or alteration of small ancillary buildings and for works and equipment such as lamps standards, shelters and barriers; the limited extension or alteration of industrial or warehouse buildings; installation of plant and machinery; provision of a hard surface within the curtilage of a building, certain aviation development on airbases; Crown railway, dockyard and lighthouse development; and Emergency development by the Crown. For national security purposes permitted development rights include the construction, maintenance or alteration of a gate, fence, wall or other means of enclosure up to 4.5m above ground level; CCTV and associated lighting, which must not exceed 10lux; and electronic communication apparatus.

2.32 Although the MOD is not governed by statutory provisions for publicity when exercising its permitted development rights (PDRs) it is to follow the guidance issued to statutory undertakers in Circulars 15/92 (replaced by National Planning Policy Framework planning practice guidance) and Circular 09/95 (WO 29/95 - 24 May 1995). The MOD is required to inform the LPA and public of developments likely to have a significant effect on amenity and the environment.

2.33 These arrangements do not apply where the MOD is exercising its PDRs in relation to emergency development or development for national security purposes. The rights relating to emergency Crown development and Crown development for national security purposes are summarised below:

- **Emergency Development** - An "emergency" is defined as an event or situation which threatens serious damage to human welfare (in a place), the environment (of a place) or the security of the United Kingdom. In these circumstances, the MOD must notify the LPA as soon as practicable after starting the development and the development must stop and the land restored to its original or an agreed condition within six months.
- **Development for National Security Purposes** - Such development includes the erection, maintenance or alteration of a gate, fence, wall or similar means of enclosure to a maximum of 4.5m above ground level, CCTV and associated lighting and electronic communications apparatus. It is important to note that this development under the GPDO differs from development provided through the procedures of a national security Direction.

2.34 The permitted development rights for 'emergency development by the Crown' and 'development for national security purposes' (Parts 37 and 38 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995) apply to all Crown land (including Her Majesty's private estates, the Duchies and the Crown Estate).

2.35 In exceptional cases, a LPA or the SoS DCLG can seek to remove PDRs through the issue of an Article 4 Direction under the GPDO. Where such a Direction has been made its effect is to require an application for planning permission to be made for the development specified in the Direction. However, such a Direction will not apply to any development permitted in relation to emergency Crown development or Crown development for national security purposes.

## 2.36 Use Classes Order

2.37 The Town and Country Planning (Use Classes) Order 1987 has been amended by article 5 of SI 2006/1282. There is a new use class C2A for secure residential institutions, which enables changes between similar types of premises to be made without requiring planning permission for a change of use. Use Class C2A would include all the various categories of secure facilities in the criminal justice and immigration estates. Two non-Crown uses have been included (one is secure local authority

accommodation and secure hospitals) because they share the land use characteristics and impacts of some of the Crown uses, whilst the second type is military barracks. The Secretary of State considers that the physical requirements and employment generating aspects of these schemes are an important consideration and that despite their residential classification, location on land allocated for employment uses is appropriate.

### **2.38 Hazardous Substances**

2.39 Hazardous substances consent normally required for the presence of a hazardous substance in, on, over or under land is not required for land at military establishments, installations or storage facilities. Despite this exemption, the MOD has in place standards for preventing major accidents and limiting their consequences equivalent to those of the statutory hazardous substances regime known as the Major Accident Control Regulations (MACR).

### **2.40 Development Proposals near or adjacent to Crown Land**

2.41 The MOD monitors Local Development Plan allocations and proposed private developments near to MOD property.

2.42 The MOD also has the ability to request that the SoS DCLG (or relevant devolved administration) gives a Direction as an objector to a planning application for a neighbouring development that might interfere with a sensitive MOD site where there is information which, in the interest of national security, cannot be disclosed to the general public.

### **2.43 Buffer Zones**

2.44 One of the general recommendations of the Defence Lands Committee 1971-1973 (Nugent Committee) accepted by the Government was that buffer zones should be introduced between MOD firing ranges and training areas and urban areas where these are in close proximity. Civilian developments, in particular housing and schools, close to such establishments can create pressure to limit the activities and other use of MOD land.

### **2.45 Safeguarding**

2.46 In a similar manner to civil airports, the MOD carries out a statutory safeguarding process at its aerodromes, technical (radar / radio / seismological) installations and explosive storage areas in accordance with Government guidance: Circular 01/2003 relating to the Town &

Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

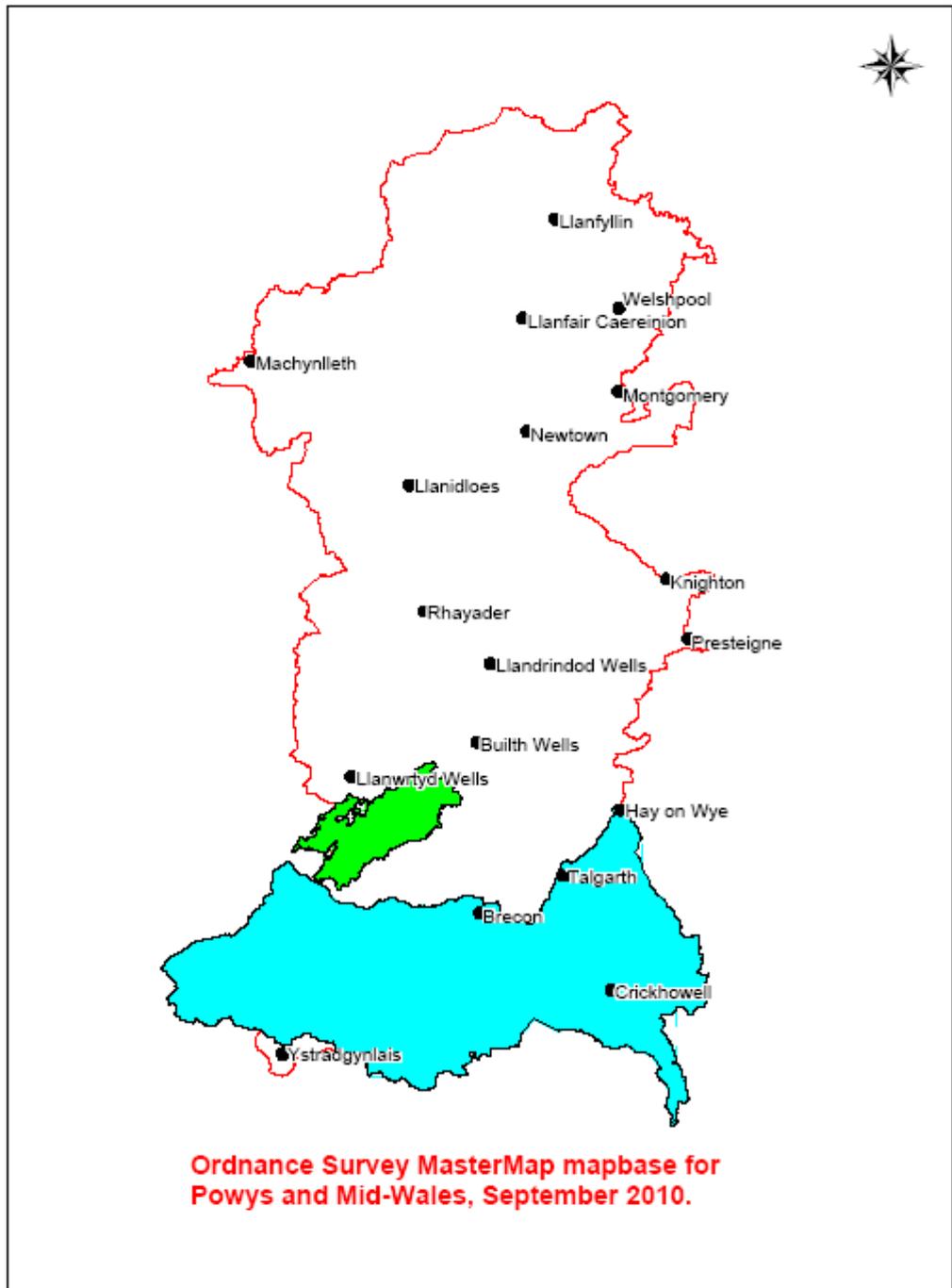
- 2.47 Safeguarding is a procedure whereby LPAs are legally required to consult the MOD about development proposals in the vicinity of specified establishments where such developments might interfere with the operational effectiveness of these sites.
- 2.48 Safeguarding zones surrounding MOD facilities are defined in maps certified by the SoS for Defence and these are issued through the Welsh Assembly to the relevant LPAs.
- 2.49 Safeguarding zones indicate the extent of the area in which applications for development must be referred to the MOD for consideration and the criteria applicable to protect the operational effectiveness of the facility concerned.
- 2.50 The MOD is also consulted on proposals for the development of wind turbines across the whole of the UK.

### **3.0 The Powys Context - The Sennybridge Training Area**

#### **3.1 Location and characteristics**

- 3.2 Sennybridge Training Area (SENTA) lies in Mid Wales within the counties of Powys and Carmarthenshire. It is situated just outside the Brecon Beacon National Park to the north west of Brecon and covers an area of approximately 31,000 acres (12,000 ha) of MOD freehold land and 6,000 acres (2,500 ha) of land leased in the Crychan Forest from Forest Enterprise. It measures approximately 12 miles (19 km) SW to NE and 5 miles (8 km) SE to NW.
- 3.3 SENTA consists mainly of a flat upland plateau known locally as Mynydd Epynt and Mynydd Bwlch y Groes. From this plateau there are spectacular views across to the Black Mountains, the Brecon Beacons, the Cambrian Mountains and the Carmarthenshire Black Mountain.
- 3.4 The uplands of the Epynt Plateau lie between the Brecon Beacons to the South and the Cambrian Mountains to the North. The wild plateau is covered largely by blanket bog and grass. The area became famous as the breeding ground for Welsh Cobs – the very name Epynt originating from an ancient expression meaning "haunt of horse".
- 3.5 The geological features consist of Old Red Sandstone in the south and centre of the area, with a band of Silurian shale in the north. Much of the

upland area is above 1,250 feet (380 m) with the highest points at the Summit (Grid SN 927434) and the Lookout (Grid SN 961464) at 1,533 feet (475 m) and 1,563 feet (478 m) respectively. Most of the stream valleys lie between 784 - 899 feet (240-275m).



Sennybridge Training Area

Mai \ May  
2011

- Sennybridge training area
- Brecon Beacons National Park

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### **3.6 Use**

- 3.7 SENTA is the MOD's third largest training area (behind Salisbury Plain and Otterburn) and is used 350 days a year.
- 3.8 In 1940, the Training Area became the site of a Royal Artillery Practice Camp. Today it hosts sophisticated live firing and dry training facilities for light forces including light (105mm) artillery. An extensive area of land to the North of Sennybridge is used by the MOD for military training purposes and is one of the major bases for infantry warfare training by the British Army in the UK and can accommodate up to 1760 soldiers.
- 3.9 The training area contains various ranges and FIBUA (Fighting in built up areas) a mock village training facility. There is an ammunition storage area located in the training area with a buffer zone.
- 3.10 At certain time of the year GPS jamming and explosions take place.

### **3.11 Rights of way**

- 3.12 The Epynt Way, which is some 80km in length, follows the periphery of the Sennybridge Training Area. The Epynt Way was established in 2003 and was completed in 2005. It is a permissive bridleway which is open all the year round; however the MoD reserves the right to close it if there is a requirement to do so. In addition a number of circular routes connect to the Epynt Way.
- 3.13 The Epynt Way caters well for horses and has 5 horse corrals, along with horse box parking areas so people can ride sections or the whole of the Epynt Way.
- 3.14 Near the Epynt Visitor Centre there is a path specifically designed for less able visitors. It consists of approximately half a mile of surfaced walk way which leads to a viewing area.

### **3.15 Conservation**

- 3.16 Mynydd Epynt is a Special Area of Conservation (SAC). The Annex II species that are a primary reason for selection of this site is the *Drepanocladus (Hamatocaulis) vernicosus* - Slender green feather-moss which occurs in at least five flush complexes within this upland range in south central Wales. The flush habitats are generally situated within expanses of grass moorland.

- 3.17 Further information on Mynydd Epynt and other information on the SENTA can be found on the following websites:

<http://jncc.defra.gov.uk/ProtectedSites/SACselection/sac.asp?EUCode=UK0030221>

[Slender green feather-moss.](#)

Clwyd Powys Archaeological Trust has compiled information on the historic environment. It is available at

[http://www.cofiadurcahcymru.org.uk/arch/cpat/english/cpat\\_interface.html](http://www.cofiadurcahcymru.org.uk/arch/cpat/english/cpat_interface.html)

The Royal Commission on the Ancient and Historic Monuments of Wales' information on the area can be accessed through its website "Coflaint" via the following link:

<http://www.coflein.gov.uk/en/site/242369/collection/SENTA+DRY+TRAINING+AREA/>

### **3.18 Other evidence**

- 3.19 The MOD has a strong commitment to conservation which is detailed in its publication 'Sanctuary Magazine' and recognised through its 'Sanctuary Awards'.

- 3.20 Sanctuary, the MOD flagship conservation magazine covers nature conservation, flora and fauna, historic environment, heritage, landscape protection, energy efficiency, community awareness and access and recreation activities on the defence estate both at home and overseas. It illustrates the MOD's commitment to conservation projects and how we are undertaking our responsibility for stewardship of the estate in the UK and overseas through our policies and their subsequent implementation.

- 3.21 The associated Sanctuary Awards have been running since 1991 and are in recognition of both individual and group efforts for projects on MOD land in the UK & overseas. There are four categories of award: Environmental; Sustainability; Heritage Projects and Individual Contribution, with the coveted Silver Otter Trophy awarded to the overall winner.

## **4.0 Analysis of Policy Context**

- 4.1 In Powys (outside the Brecon Beacons National Park) the key military land interest is the Sennybridge training area on the Epynt. It is a training site of strategic importance in UK terms and this should therefore be reflected by both the Powys and the Brecon Beacons National Park Local Development Plans.

- 4.2 Whilst the main camp lies within the Brecon Beacons National Park in Sennybridge, the main training areas lie within Powys' planning area.
- 4.3 Much work is done by Ministry of Defence to ensure that developments that take place in the training area are authorised. Enhancements have been made to the rights of way network, in particular the Epynt Way.
- 4.4 It should be noted that in the main, the development that takes place in the training area is of a very modest scale. Former notifications relate, for instance, to development relating to the rights of way network and ranges.
- 4.5 The Powys Unitary Development Plan was placed on Deposit in October 2004, prior to the removal of Crown immunity. Therefore the Powys Local Development Plan is the first development plan for the Local Planning Authority Area that needs to consider the issue of Military Operations.
- 4.6 Like all other public sector organisations, MOD capital spending is constrained. In the short to medium term, given the current economic climate and based on previous levels of development on the range, substantial development is unlikely to take place on the training area over the life of the Powys Local Development Plan to 2026. Nevertheless it is very important that the Local Development Plan recognises the development needs of the MOD and seeks to facilitate developments that support this nationally important area through the Plan.

## **5.0 Key Issues and Context for consideration in the LDP**

- 5.1 It is important to make a connection between the proposed Military Operations Policy within the LDP and the Key Issues and Considerations which are outlined at the outset of the LDP document.<sup>3</sup> These are the key issues and considerations facing Powys and which the LDP seek to address. With regard to Military Operations, Key Issue No. 48 which falls within the Infrastructure and Resource Considerations section is relevant which states:

*The LDP needs to safeguard and support the MoD's Sennybridge Training Area on Mynydd Epynt as a nationally important military training area.*

- 5.2 The Key Issues as outlined in the LDP help inform the proposed objectives as set out in the LDP which in turn meet the LDP's Vision.<sup>4</sup>

- 5.3 The Key LDP Objectives<sup>5</sup> relevant to Military Operations are:

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<sup>3</sup> Page 18 LDP PCC. Powys LDP 2011-2016. Deposit Plan (July 2014)

<sup>4</sup> Page 23 LDP PCC. Powys LDP 2011-2016. Deposit Plan (July 2014)

<sup>5</sup> Pages 24 – 26. PCC. Powys LDP 2011-2016. Deposit Plan (July 2014)

***LDP Objective 10 – Important Assets***

*To support the operation and development of regionally and nationally important assets located in Powys.*

- 5.4 Having regard to the context of the LDP objectives contained within the LDP, the key issues and considerations and background evidence the general approach of the Military Operations Policy is:
- To seek to facilitate the operation of the training area, recognizing its national significance, and safeguarding it from any wind farm or other development that would compromise its operation.
  - To support the conservation and rights of way work undertaken by Ministry of Defence and to ensure that new developments are sympathetic to the environment.
  - To respect the ammunition storage area, ensuring that no new vulnerable development is permitted in close proximity to it.

## **6.0 Recommendations**

- 6.1 The evidence as outlined in this paper has informed the writing of the general development management Policy and the detailed Military Operations Policy for the Deposit Plan as shown below

### **Policy DM1 - Strategic Planning Matters**

**All proposals for development must not compromise, or unacceptably adversely affect, either on their own or in combination with existing or approved development, the following:**

- 1. Important material assets and their operation including:**
  - i. Strategic infrastructure including:**
    - a. Transport and safeguarded routes.**
    - b. Reservoirs and water supplies.**
    - c. Sennybridge Training Area.**
    - d. Best and most versatile Agricultural land (Grades 1, 2 and 3a).**

### **4.13 Military Operations**

*4.13.1 Since the removal of Crown Immunity by the Planning Acts, the Ministry of Defence is required to apply for planning permission<sup>6</sup> for certain development proposals on the Sennybridge Training area.*

*4.1.3.2 The Sennybridge Training Area is a site of strategic military importance in the UK. In accordance with Policy DM1, it will be safeguarded from development that would compromise its operation.*

### **Policy MD1 – Development Proposals by the MOD**

***Proposals by the MOD for development within the Sennybridge Training Area or elsewhere in Powys will be supported where they sustain operational use of an existing facility.***

- 6.2 It is noted that no representations were received during the Powys Local Development Plan Deposit from July to September 2014 with regard to Military Operations and therefore it is recommended that no changes are proposed to the policy and justification sections of the plan as outlined above.

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<sup>6</sup> The Crown still enjoys certain exemptions and special arrangements with respect to matters involving national security or special urgency. Special arrangements and exemptions also exist relating to enforcement against the Crown.

## **7.0 Justification of Military Operations Policy**

- 7.1 The Council recognises the strategic military importance of the Sennybridge Training Area in Powys and the LDP policy has been included to ensure that the training area is safeguarded from any development that would have the potential of compromising its operation.
- 7.2 The Council recognises that since the removal of Crown Immunity by the Planning Act in 2006, the MOD are required to apply for planning permission for certain developments within the training area.
- 7.3 In accordance with the general development management policies of the LDP, namely DM1, DM2 and DM3, operations within the training area will be supported where they sustain the operational use of the existing facility. This also accords with one of the key issues of the LDP to ensure the Sennybridge Training area on Mynydd Epynt is safeguarded as a nationally important military training area and also Objective 10 of the LDP which supports the operation and development of regionally and nationally important assets located in Powys.

## **8.0 Review of UDP Policies**

- 8.1 The Powys Unitary Development Plan was placed on Deposit in October 2004, prior to the removal of Crown immunity and does not contain any specific Military policies. Therefore the Powys Local Development Plan is the first development plan for the Local Planning Authority Area that needs to consider the issue of Military Operations.

## **9.0 Neighbouring Authorities and Cross Border Working**

- 9.1 The Brecon Beacons National Park Authority are the only neighbouring authority to Powys where cross border working should be assessed with regard to Military Operations.
- 9.2 Although the training areas lies mainly within Powys' planning area, it is serviced from the Brecon Beacons National Park (BBNP), in particular the camp is located in Sennybridge. Whilst the scale and levels of development in the training area are such that they should not create new cross boundary issues, the strategic importance of the training area and its relationship with local communities is of relevance to each authority's development plan. For instance the training camp supports the local services in Sennybridge.
- 9.3 Aside from the Sennybridge training area the housing market in Brecon is impacted upon by the military presence in the town. This may lead to additional pressure for housing in Powys outside the National Park

Planning area although this very much depends on the levels of housing provision made in Brecon through the National Park Local Development Plan.

- 9.4 The BBNP authority adopted their LDP on 17th December 2013. Section 3.4 of the plan refers to Ministry of Defence Developments and states in para 3.4.1

*“The Ministry of Defence has an administrative headquarters and three training camps in the Park. Should it propose further development on these or elsewhere, the NPA would consider such applications in the light of the relevant policies in this LDP”*

- 9.5 The Council are fully aware of the need to liaise with the BBNP on any aspect of Ministry of Defence development due to its strategic importance to the neighbouring authorities.

## 10.0 Monitoring

- 10.1 The Monitoring framework sets out the information that will be reported in the LDP’s Annual Monitoring report (AMR) based on the period 1<sup>st</sup> April to 31<sup>st</sup> March and any actions that will be undertaken should the LDP be found to be failing to meet its objectives. A full review of the LDP will be commenced four years from its adoption.

- 10.2 The table below shows the proposed Monitoring for Military Operations:

### Military Operations (MOD)

Topic & Reference	Material Assets – Sennybridge Training Area - AMR 40
<b>LDP Objective</b>	LDP Objective 10 – Important Assets. To safeguard and support the continued operational use of the Sennybridge Training Area.
<b>Target</b>	For the Sennybridge Training Area to continue as a nationally significant training facility. *Plan contributes to meeting this target. Other non-planning factors influence whether it will be met.
<b>Policies</b>	Policies DM1 Criterion 7, i, c. and MD1.
<b>Local Indicator</b>	The continued operation of the Sennybridge Training Area.
<b>Source</b>	Development management information.
<b>Triggers and Actions</b>	Number of relevant applications per annum for development of the range approved <100% – Investigation / internal audit and recommendations. Indication of the significant decline in use of the

	Sennybridge Training Area – Consider policy review and modification.
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