



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

## **Engagement and Community Involvement Record – July 2024**

Stages 1 and 2 of Delivery Agreement  
Leading up to Pre-deposit Participation  
(Regulation 14) and Pre-deposit Consultation  
(Regulation 15)

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



## Introduction

The Powys Replacement Local Development Plan is being drawn up in accordance with a Timetable and Community Involvement Scheme as set out in the Plan's Delivery Agreement (original 2022, as revised July 2024).

This record has been prepared to capture the engagement and involvement steps the Council has undertaken since July 2022 from the formal start of the replacement plan process up to the stage of preparing the Preferred Strategy (or "Pre-deposit" Plan) at Stage 3 of the Delivery Agreement.

Following the Preferred Strategy consultation, the Council will be preparing the more formal Initial Consultation Report as required by the LDP Regulations which will be published alongside the Deposit Plan (Stage 4).

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## 1. Engagement and Consultation on the Delivery Agreement

### 1.1 The Delivery Agreement

#### Community Involvement Scheme (CIS) - Stage 1: The Delivery Agreement (DA)

Consultation Draft:	January 2022
Public Consultation Period:	6.01.22 – 01.02.22
Number of Representations Received:	19
Reps and Council Responses:	Provided in Appendix 4 of approved DA
Approved by:	Full Council on 03.03.22
Approved by:	Welsh Government on 13.06.22
Published:	June 2022*
Copies made available:	On-line
Copies made available:	At the Deposit location (County Hall) and 12 Libraries

\*It should be noted that due to timetable slippage a revised Delivery Agreement (July 2024) showing updated target dates now replaces the original 2022 Delivery Agreement.

## 2. Engagement and Consultation prior to Regulation 14 (Pre-deposit Participation)

### 2.1 The Candidate Site Assessment Methodology

#### CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

Consultation Draft:	September 2022
Public Consultation Period:	5 weeks 06.09.22 – 10.10.22
Number of Representations Received:	44
Reps and Council Responses:	Appendix 1 of this report
Approved by:	LDP Working Group (01.09.22)
Published:	November 2022
Copies made available:	On-line

**Summary:** In total, the Council received 44 representations during the engagement period from 13 individuals and organisations (representors) as listed below. All comments were submitted via the on-line Consultation Portal or by email to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk). The representations made and Council responses are included in Appendix 1.

#### Representators:

- Western Power Distribution
- Natural England
- Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch
- Bausley with Criggion Community Council
- Clwyd-Powys Archaeological Trust

- Dyfed Powys Police
- Mr Stephen Ashley
- Dwr Cymru Welsh Water
- Montgomery Town Council
- Border Hardcore
- Natural Resources Wales - Mid Region
- Avison Young/National Grid
- Cadw

## 2.2 Introduction to the Integrated Sustainability Appraisal (ISA) Process

### CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

Public Consultation Period:	5 weeks 06.09.22 – 10.10.22
Number of Representations Received:	9
Reps and Council Responses:	Appendix 2 of this report
Approved by:	LDP Working Group (01.09.22)
Published:	November 2022
Copies made available:	8-page document On-line

**Summary:** In total, the Council received 9 representations during the engagement period from 6 individuals and organisations (representors) as listed below. The representations made and Council responses are included in Appendix 2.

#### Representators:

- Natural England
- Clwyd-Powys Archaeological Trust
- Cadw
- Welsh Language Commissioner/ Comisiynydd y Gymraeg
- Newtown & Llanllwchaearn Town Council
- Mineral Products Association Wales

**Explanatory Note on ISA:** The ISA is a process that incorporates six appraisals that are required by legislation and other commitments: Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Welsh Language Impact Assessment (WLIA), all of which are related to one another. HRA has separate steps beyond the ISA and has its own process for this. The ISA process is being undertaken by ISA Consultants (WSP) and starts with a Scoping Report. The process appraises the environmental, social and economic performance of the Replacement LDP and any reasonable alternatives. The Draft Scoping Report and Appraisal Framework was consulted upon in a targeted way with statutory stakeholders and reported to the LDP Working Group (December 2022). An Initial ISA Report will be produced by WSP and published at the Preferred Strategy stage for public consultation. It will be accompanied by a report that captures the representations made at the time of scoping consultation (hence they are not included in this Engagement Record).

## 2.3 Introduction to the Habitats Regulations Assessment (HRA) Process CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

Public Consultation Period:	5 weeks 06.09.22 – 10.10.22
Number of Representations Received:	6
Reps and Council Responses:	Appendix 3 of this report
Approved by:	LDP Working Group (01.09.22)
Published:	November 2022
Copies made available:	4-page document On-line

**Summary:** In total, the Council received 6 representations during the engagement period from 4 individuals and organisations (representors) as listed below. The representations made and Council responses are included in Appendix 3.

### Representators:

- Natural England
- Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch
- Natural Resources Wales - Mid Region
- Newtown & Llanllwchaearn Town Council

**Explanatory Notes on HRA:** The HRA process is being undertaken by the ISA Consultants (WSP), running alongside the ISA process. HRA determines whether there will be any ‘likely significant effects’ as a result of the Replacement LDP on any “National Site Network” sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites) designated for nature conservation. An Initial HRA Report will be produced by WSP and published at the Preferred Strategy stage for public consultation. It will be accompanied by a report that captures the representations made at the time of the scoping consultation (hence they are not included in this Engagement Record).

## 2.4 Powys County Council “Call for Candidate Sites” CIS - Stage 2: Call for Candidate Sites.

Advertised/Publicised:	6 weeks (01.11.22 -13.12.22)
Documents made available:	“Submission Pack” comprising: Candidate Site Guidance Notes, interactive Constraints Map, Candidate Site Assessment Methodology, Candidate Site Viability Assessment Guidance (and Development Viability Model), Local Landscape Character Assessment, Candidate Site Submission Form.
Number of Submissions Received:	303
Number of Submissions Validated:	302
No. of Submissions Since Withdrawn:	4 (as of July 2024)
Approved by:	not relevant
Published:	Pending in Candidate Sites Register

Copies made available: Pending – in accordance with Preferred Strategy (Pre-deposit) procedures

Most site proposals were submitted on-line through the Consultation Portal which facilitated easy digital mapping. Sites are being appraised in accordance with a published methodology (see 2.1). A Candidate Sites Register will be produced at the Preferred Strategy stage for public consultation. This will include all the validated site submissions and provide the results of the initial site filter undertaken in accordance with the candidate site assessment methodology.

## 2.5 Powys County Council Internal Workshop on Key Issues and Vision (targeted engagement)

CIS- Stage 2: Evidence Gathering and Stakeholder Involvement

Held: In person, December 2022

**Summary:** The workshop was held at County Hall, Llandrindod Wells and managed by an external facilitator (Dafydd Thomas). It was attended by: Planning Policy Officers/LDP Working Group Members plus invited Planning Committee Members. The purpose of the exercise was to discuss which Key Issues were likely to be relevant to the Replacement LDP and encourage “free thinking”. From looking at potential issues, the attendees then gave some initial thought on a what a Vision for the Plan might look like.

## 2.6 Powys County Council Internal Survey on Key Issues and Vision (targeted engagement)

CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

Held: On-line, May/June 2023

**Summary:** The on-line survey was managed by an external facilitator (Dafydd Thomas). Details were circulated by Planning Policy Officers to all County Councillors and all Powys County Council internal services (via Directors and Heads of Service) so that a range of views from across the organisation could be captured. The survey was open between 26<sup>th</sup> May and 19<sup>th</sup> June 2023. Survey respondents were asked to rate 20 proposed issues according to importance and give their views on the importance of the Replacement LDP overall and make comments on what it should be looking to address. Respondents had the opportunity to explain the rating scores they provided. An open question was included so that respondents could add any other issues they wished to be considered.

The survey received a limited response, with 8 participants submitting 81 comments overall.

## 2.7 Public Engagement/Consultation on Draft Key Issues, Vision and Objectives for the Powys Replacement LDP (Consultation Paper)

### CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

Consultation Draft:	January 2024
Public Consultation Period:	3 weeks 8.01.24 – 28.01.24
Copies made available:	On-line
Copies made available:	At the Deposit location (County Hall) and 12 Libraries
Number of Representations Received:	27 on-line (Have your Say) 21 responses by email or letter
Reps and Council Responses:	Appendix 4 of this report
Approved by:	Consultation feedback was summarised and provided to the LDP working group (April 2024). Formal agreement to the revisions will be as part of the approval process for the Draft Preferred Strategy.
Published:	KIVO revised and re-drafted in response to feedback received, pending publication as a chapter of the Preferred Strategy.
Copies made available:	Not applicable

**Summary:** In total, the Council received 120 representations during the engagement period from 48 individuals and organisations (representors). On-line responses (utilising the Council’s engagement hub Have-Your-Say) were gathered anonymously (some respondents chose to include their name) but all written (email or letter) responses included representor names. The representations made and Council responses are included in Appendix 4.

#### Representators:

- Avison Young (agent)
- Bausley with Criggion Community Council
- Caersws Community Council
- CarneySweeney (agent)
- Chair of Powys Local Access Forum
- Clwyd-Powys Archaeological Trust (CPAT)
- Cwmpas
- Cyfoeth Naturiol Cymru/Natural Resources Wales
- Glandwr Cymru/Canal & River Trust in Wales
- Historic England (confirming they had no specific comments to make)
- Llandrinio & Arddleen Community Council
- Llandysilio Community Council
- Natural England
- Network Rail
- Newtown & Llanllwchaiarn Town Council
- Powys County Council – Countryside Access and Recreation
- Stantec (agent)\* – \*representation not duly made as not connected with KIVO
- The Leith Group (agent)



- The Mineral Products Association
- Individual (B Dennison)
- Individual (P Foulkes)
- Individual (J Philipps)
- Individual (A Yates)
- Plus representors who responded on-line (anonymously as not asked to supply names).

## 2.8 Stakeholder Involvement in Evidence Preparation

### CIS - Stage 2: Evidence Gathering and Stakeholder Involvement

The Council has sought to involve key stakeholders, according to expertise/subject relevance, in the preparation of evidence, including for example on development viability, on housing (Local Housing Market Assessment, Gypsy & Traveller Accommodation Assessment), on Employment (Employment Needs Assessment), on the role and function of settlements (Settlement Assessment), on Welsh Language and on constraints (Strategic Flood Consequences Assessment, Infrastructure and Transport planning). The details of any such engagement or consultation can be found within the published evidence and/or will be summarised within a published Replacement LDP background paper.

## 3. Pre-deposit Participation (LDP Regulation 14): Alternative Strategies and Options

### 3.1 Stakeholder Workshop on Growth Options (targeted engagement)

#### CIS - Stage 2: Pre-deposit Participation

Held:	On-line 31st January 2024
Method:	Inter-active on the day and follow-up questions on-line until Wednesday 7 <sup>th</sup> February.
Feedback:	Facilitator's record incorporated into the Growth Options Background Paper being published at Preferred Strategy stage.

**Summary:** The two hours on-line workshop was facilitated by an External Facilitator (Dafydd Thomas) and attended by 40 people (internal and external) representing a range of stakeholder interests, for example the Housing Authority, Registered Social Landlords and Utility companies. As a targeted session it was not open to the wider development industry (such as planning agents, house building firms, architects and land agents) but representative bodies (e.g. Home Builders Federation, Farmers Union Wales and National Farmers Union, and the Economic Forum) were invited.

Growth options in terms of potential housing numbers and employment land (hectare) were presented. Presentations included reference to the under-lying evidence sources.

### 3.2 Stakeholder Workshops on Spatial Options (targeted engagement)

#### CIS - Stage 2: Pre-deposit Participation

Held:	In Person 11.03.24 and 13.03.24
Method:	Inter-active at the sessions and follow-up questions on-line until Thursday 21 <sup>st</sup> March.
Feedback:	Facilitator's record incorporated into the Spatial Options Background Paper being published at Preferred Strategy.

**Summary:** Two three hours in-person workshops were held, one in the south (Llandrindod Wells) for the 7 housing market areas of Crickhowell, Hay and Talgarth, Ystradgynlais, Brecon, Llandrindod Wells and Rhayader, Builth wells and Llanwrtyd Wells and Knighton and Presteigne, and one in the north (Newtown) and for the 6 housing market areas of Welshpool and Montgomery, Llanfyllin, Llanfair Caereinion, Machynlleth, Newtown and Llanidloes

Workshops were facilitated by an External Facilitator (Dafydd Thomas). 12 delegates plus policy staff attended on 11<sup>th</sup> March (South) and 16 delegates plus policy staff attended on 13<sup>th</sup> March (North) with people representing a range of stakeholder interests including the Housing Authority and Registered Social Landlords. Again, as this was targeted, it was not open to the wider development industry but representative bodies were invited. Potential spatial options in terms of the distribution of housing and employment land, alongside further interpretation of how the different growth levels (options) might look for each spatial option, were presented.

Presentations were given by planning policy staff before the round-table discussions/workshop questions. A set of workshop booklets were provided to summarise and explain the options under discussion.

### 3.3 Powys County Councillors (Members) Seminar on the Emerging Powys Replacement LDP

#### CIS - Stage 2: Stakeholder Involvement

All Powys County Councillors were invited to an on-line meeting, held for one and a half hours on Monday 10<sup>th</sup> June 2024. During the meeting, presentations were given by planning policy staff covering 1. Introductions, 2. Background Explanation of the LDP process, 3. The Draft RLDP Preferred Strategy (including how it responds to evidence) 4. What Happens Next?

Question and answer sessions were incorporated throughout.

The seminar was attended by 25 County Councillors plus staff. Following the event the presentation and recording (Microsoft Teams) was circulated to all County Councillors to ensure it reached the whole target audience.

### **3.4 Town and Community Councils – Powys Replacement LDP Question & Answer Session**

#### **CIS - Stage 2: Stakeholder Involvement**

This session was held on-line for one hour on the evening of Tuesday 9<sup>th</sup> July 2024. Microsoft Teams Invites were sent to Town and Community Council Clerks on 23<sup>rd</sup> May 2024.

Following the session (15 external attendees), the presentation was circulated by email to all Powys Town and Community Councils. The presentation dealt with: Summary of Preparing a Local Development Plan, What is the Preferred Strategy?, What is in the Preferred Strategy?, Growth – what is the right amount to plan for?, Where should this growth go? Preferred Strategy Consultation due in 2024, Question Time.

### **4. Next Steps:**

#### **Pre-deposit Public Consultation (LDP Regulation 15) and Public Consultation Representations (LDP Regulation 16)**

#### **4.1 Public Consultation on the Pre-deposit Plan/Preferred Strategy**

##### **CIS - Stage 3: Pre-deposit Public Consultation**

This Engagement and Community Involvement Record maps the Powys Replacement LDP preparation process up to stage of preparing the Preferred Strategy/Pre-deposit Plan. It is a requirement for Powys County Council (Full Council) to approve the Preferred Strategy before it is publicly consulted on. Full Council, together with Welsh Government, will also need to agree to a revised Delivery Agreement (July 2024) to implement a revised preparation timetable which addresses the programme slippage since the original DA (2022).

At Stage 3 of the DA, the Council will conduct the statutory consultation on the Preferred Strategy/Pre-deposit Plan and publish all supporting documents including a Candidate Sites Register. The consultation will run for at least six weeks and comments (representations) will be invited. In due course, as required by the LDP Regulations, an Initial Consultation Report will be produced detailing the steps undertaken pursuant to Regulations 14 to 16A including the main issues raised and how they have influenced the Deposit LDP (Stage 4).

## Appendices – Record of Engagement/Consultation Comments and Council Responses

### Appendix 1: Candidate Site Assessment Methodology

Consultation Document	No. of Representations received
Candidate site Assessment Methodology	44

**Table Showing the Main Issues Identified from the Consultation on the Candidate Site Assessment Methodology and the Council Response**

Respondent	Issue / Representation	Council Response
Western Power Distribution	It is stated that they cannot provide electrical services without infrastructure and applications for the individual sites.	Comments noted
Natural England	It is stated that they do not consider that the Candidate Site Assessment Methodology & Plan-making Assessment Process poses any likely risk or opportunity in relation to their statutory purpose, and so do not wish to comment on this consultation.	Comments noted
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	<p>The Candidate Sites process is suited to housing, retail and manufacture/production in settlements (mapped).</p> <p>Overemphasis on CS developments sidelines development in the open countryside. "Other sites" (see 1.1.8) such as renewal energy, intensive agriculture installations, anaerobic digesters, habitat restoration projects, do not come forward as "candidate sites". The remainder of the LDP needs special attention to ensure Powys looks after cumulative impacts of development in the open countryside.</p> <p>The LDP is an opportunity for Powys to extend a vision of</p>	The candidate site process is geared towards selecting the allocations for the Replacement LDP. Sites submitted that are not for housing, employment retail etc.. will be considered within other topic related types of evidence as the Replacement LDP progresses, in turn this evidence will determine the policies and proposals of the plan.

	improved rivers to the Severn catchment.	
Bausley with Criggion Community Council	<p>They state that they are victims of ribbon strip development, where most development has followed the B4393 between Crew Green and Coedway, which leaves them with a long strip of housing approximately 3 miles long.</p> <p>No communal space / memorial / meeting place / shop/ pub etc to act as a focal point other than the village school, Bryn Hafren.</p> <p>The Councillors of Bausley with Criggion will not identify any other sites than the existing P15 HA1 which they believe should be utilised before any other.</p>	The community council will have the opportunity to comment on any further candidate sites submitted by other parties at the Preferred Strategy stage
Clwyd-Powys Archaeological Trust	In agreement with the methodology set out. CPAT's primary interest will be access to the Candidate Sites Register when it is made accessible in May/June 2023 and we would normally advise on the suitability of all Candidate Sites at this time in relation to any potential archaeological impacts arising from development.	Comments noted
Dyfed Powys Police	With regard to the Candidate Site Assessment Methodology, Dyfed Powys Police will not be putting any sites forward and therefore there are no comments to add.	Comments noted.
Mr Stephen Ashley	<p>Mostly publicly owned land and buildings and green space in a large area within Llandrindod Wells (Arlais Day Centre, Old Library, Government Offices, Coleg Powys, Autoplace) provides an opportunity for considered development as a whole to create a "town within a town" with criteria for health, education, commercial, residential, green space; all aimed at zero waste, zero carbon footprint, zero traffic, zero fossil fuel.</p> <p>No planning permissions should be granted until this area has been</p>	The Powys Replacement LDP will adopt a 'Placemaking' approach when considering potential allocations, policies and proposals. However, the suggested proposals fall more within the remit of a Place Plan undertaken at the community level rather than a Replacement LDP undertaken by the Local Planning Authority.

	considered as a distinct planning unit.	
Dwr Cymru Welsh Water	Permits are required for NRW and they have not yet had final confirmation for AMP8  Therefore, they cannot advise on decision regarding investment priorities in AMP8 or in future AMPs that cover the latter stages of the Replacement Plan time period	Comments noted and will be taken into consideration when developing strategic options and in the assessment of candidate sites
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	See response above. Only a few of the listed "Candidate Site Land Uses" are proposed in practice. The list carries the (possibly unintended) implication that is a priority order. Thus open market housing is more important than affordable housing and biodiversity, transport infrastructure and minerals are hardly important at all. Suggest: "please note that this list is not exhaustive, is not in any priority order and that ..... CPRW is keen to see robust, effective policy for affordable and specialist housing with safeguards against developers "wriggling out" in mid-development.	Agree it is not intended to be a priority order and that the amended wording would make it clear.
Natural Resources Wales - Mid Region	2.1.2 Candidate Site Land Uses list Does the category 'employment' include agricultural enterprises? We advise modification to category Green Infrastructure / Open Space, to include Sustainable Urban Drainage Linking SuDs to Green Infrastructure and open space would help realise multiple benefits through land use planning.  2.2.1 Sustainability, Viability and Deliverability, This section states: Evidence needs to be submitted by site proposers to enable the LPA to assess the following: - That the site is in a sustainable location (as defined in Planning Policy Wales Edition 11) and can be freed from all constraints. - That the site is capable of being delivered. - That the site is viable. We consider Sustainability to be broader than the site being in a 'sustainable' location	2.1.2 Candidate Site Land Uses List The category employment is not aimed at agricultural enterprises; however, the Candidate Site Assessment Methodology does not preclude these forms of development coming forward. Agree amend paragraph 2.1.2 to include Sustainable Drainage Systems (SuDS)  2.2.1 Sustainability, Viability and Deliverability Attempts have been made to keep the wording concise and consistent with the Development Plans Manual (Edition 3). This wording is copied from the Manual paragraph 3.36.

	<p>and ‘free from constraints’. More could be said in bullet point one about Placemaking and creating sustainable places encouraged by the Development Plans Manual Edition 3.</p> <p>2.2.2 Sustainability, Viability and Deliverability, points to address</p> <ul style="list-style-type: none"> <li>- The site is in a sustainable location (in accordance with the site search sequence set out in Planning Policy Wales (PPW) (Edition 11) (which has informed the LPA's candidate site assessment methodology). We particularly draw your attention to section 3.30 of PPW which puts emphasis on transitioning to a low carbon economy, reducing greenhouse gas emission, reducing the vulnerability of our natural resources and build an environment which can adapt to climate change, adheres to SMNR principles. We would also stress it should be in line with the aims and objectives of the Mid Wales Area Statement. We also suggest including a new bullet point: - The site location, type, quantum and character of development is compatible with supporting placemaking, local distinctiveness and the sustainable management of natural resources objectives. This imbeds broader policy intent in decisions on where future planning of growth is best planned for. Screening sites based on “least constraints” might limit the number of planning issues that come up at planning submission stage, but this only part of the sustainability approach.</li> </ul> <p>2.2.4 Sustainability, Viability and Deliverability</p> <p>We suggest you add the text in red to this paragraph of the report. The LPA will require submitted sites to be accompanied by a Viability Assessment (see paragraphs 4.2.9 and 6.2.23). It may also request</p>	<p>2.2.2 Sustainability, Viability and Deliverability,</p> <p>Efforts have been made to keep the wording in this section concise and consistent with the Development Plans Manual (Edition 3). The wording in paragraph 2.2.2 is copied from the Manual section 3.47. However, the importance of these comments are noted and it is proposed to insert “Planning Policy Wales (Edition 11) puts an emphasis on transitioning to a low carbon economy, reducing greenhouse gas emissions, reducing the vulnerability of natural resources and creating a built environment which can adapt to climate change, whilst adhering to the Sustainable Management of Natural Environment principles. Candidate Site submissions will also be considered as to whether they aligned to the aims and objectives of the Mid Wales Area Statement.” Into Section 6.</p> <p>2.2.4 Sustainability, Viability and Deliverability,</p> <p>Agree with comments, however, will refer to the analysis as a ‘landscape assessment’ which the local agents are familiar with and can seek guidance through the Powys LDP landscape SPG.</p> <p>2.2.5 Sustainability, Viability and Deliverability, Agree with comments, it would be beneficial for site proposers to view the constraints map and undertake a site appraisal. Amend paragraph 2.2.5 to read “To support the preparation of Candidate</p>
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	<p>additional information such as ecological surveys, landscape, townscape and visual analysis, flood consequences assessments, drainage studies, traffic impact assessments...” Given candidate sites lie within open countryside and the character of Powys’s landscape and historic settlements in one of its assets and critical to Placemaking - landscape, townscape and visual advice will be important for some sites in locations that are particularly visible and likely to influence the character and sense of place of valued landscape and townscape e.g. key gateways to towns and villages; new urban edges onto open countryside – does the new urban form fit well with the existing townscape /landscape pattern and form a logical extension ? etc.</p> <p>2.2.5 Sustainability, Viability and Deliverability</p> <p>We suggest the following modifications to this paragraph: To support the preparation of Candidate Site submissions, the LPA will produce an interactive constraints map. This will enable site proposers to easily identify any key policy and designated site constraints. Site appraisal is also advised e.g. to understand the specific natural, environmental and heritage conservation features, and character and visual amenity value of the site.. associated with sites, and to identify whether additional information will be required as part of the LPA's candidate site assessment process. “In our experience, initial desktop analysis plus some site survey work is necessary at the preliminary stage to consider viability against the key planning policy topics of PPW11.</p>	<p>Site submissions, the LPA has produced an interactive constraints map. This will enable site proposers to easily identify any key policy and designated site constraints. Site appraisal is also advised e.g., to understand the specific natural, environmental and heritage conservation features, and character and visual amenity value of the site. Both the constraints map and the site appraisal should be used to determine whether additional information will be required as part of the LPA’s candidate site assessment process.</p>
<p>Campaign for the Protection of Rural Wales (CPRW)</p>	<p>Not clear if the ISA assessment (second green box) is according to criteria in the Appendix to this document. If so, it needs considerable work to ensure</p>	<p>The stages in the diagram are reflected in the titles of the following sections. Section 6 titled "Detailed Site Assessment / ISA</p>



<p>Brecon &amp; Radnorshire Branch</p>	<p>"sustainability" in any meaningful sense of the word.</p>	<p>Assessment Stage " provide a cross reference to Appendix 1.</p>
<p>Montgomery Town Council</p>	<p>Heritage: There need to be clear assessment criteria for detrimental direct / settings impacts on Historic Environment designations</p> <p>Landscape: Neighbouring National Parks or AONBs (including those in Shropshire where these abut the Welsh border) must be considered but also the more local landscape and the identified local Character Areas, it is imperative that local landscape characteristics are given a high ranking in assessment. Loss of landscape amenity is irreversible</p> <p>· (Tourism): Inappropriate development can be damaging to both and the value of tourism to the area and potential for growth needs to be part of the assessment process</p> <p>Stated Objective 5 is: To Improve the health and well-being of all sectors of society. However this is not well reflected in the assessment criteria. As identified in the European Landscape Convention (to which Wales is a signatory), landscape is critical to the well being of communities and visual amenity and access to open countryside are key factors. Both need to be assessed. In terms of health facilities the criteria cannot be only regarding proximity but must identify sufficiency and capacity for the increased population proposed. If the medical infrastructure is insufficient then this would need to be remedied through a s.106 agreement.</p> <p>Location should facilitate interaction with the existing community to ensure a sense of place, coherence and belonging is maintained as this is integral to well being. Proximity should reflect residents being able to walk and cycle to facilities. Over expansion and separation of some villages in Powys has been</p>	<p>Heritage - Comment noted. Heritage Assessment is detailed in Table 16. Criterion 15 and will be dealt with on a case-by-case basis depending on the designation (and setting), nature of the development proposal, consultee feedback, heritage impact assessments and mitigation proposed</p> <p>Landscape - Comments noted, a Local Landscape Character Assessment (LLCA) for the Powys Local Development Plan (LDP) Area has been undertaken which will assist in the assessment of Candidate Sites.</p> <p>Tourism - The Local Landscape Character Assessment (LLCA) for the Powys LDP area will assist with preventing inappropriate development in the plan area.</p> <p>Health Facilities - Work regarding sufficiency and capacity of health facilities has been undertaken in a Settlement Audit which will inform an Infrastructure Plan to support the Replacement LDP</p> <p>Community - Comments noted, they fall within the Placemaking approach advocated by Planning Policy Wales (Edition 11) that the Replacement LDP must align to</p> <p>Size of the current village / town and proximity to</p>

	<p>disastrous to community spirit and engagement. One of the assessment criteria should be the size of the current village / town. This may be expressed in terms of a % over which increase should not be permitted in any one 10 year plan. A town of 11 000 residents will easily assimilate a further 100 dwellings if it can be demonstrated there is a requirement. A village/town of 1200 residents is likely to experience a severe strain on infrastructure and facilities by the same number. Generally small clusters of development will be more suited to smaller towns and villages. It may be appropriate to review the Hierarchy for development so that smaller settlements (less than 2 000 inhabitants are considered suitable for infill and small clusters of development only to preserve their integrity</p> <p>Larger developments should be assessed on proximity to potential employment to prevent the development of dormitory towns and villages. Creation of such areas is generally deleterious to community and sense of place but also has no advantage to the local economy as residents shop where they work</p> <p>Highways infrastructure – of paramount importance and all of the following need to be assessed:</p> <ol style="list-style-type: none"> <li>1) Site accessibility and safety</li> <li>2) overall capacity of the community to take further traffic flow</li> <li>3) air quality impact on residential properties near to roads. There are no clear assessment criteria for air quality</li> <li>4) parking issues</li> <li>5) overall sustainability and contribution to a low carbon future</li> </ol>	<p>employment opportunities - This work will be done through a settlement assessment which will inform the Replacement LDP Spatial Strategy, including a settlement hierarchy. Candidate Sites will be assessed against the Spatial Strategy and settlement hierarchy</p> <p>Highways Infrastructure - The Local Planning Authority will work closely with highway officers to make sure that successful candidate sites are able to meet the five points raised to satisfactory standards</p> <p>Local Surveys (Housing) - Some of this work is being undertaken within the Local Housing Market Assessment (LHMA) which is a key piece of evidence informing the Replacement LDP. It is for local communities to undertake Place Plans</p>
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	<p>Assessment should include consideration of local surveys / Place Plans in identifying scale and design of new build required and type of housing e.g. affordable homes / local needs / rent to own / sheltered/ adapted accommodation/ houses with workspace at a specific location.</p>	
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<ul style="list-style-type: none"> <li>· Confusion about what kind of development would apply to the minimum gross site area of 1 Ha</li> <li>· The minimum gross site area of 1 Ha is a huge area either within any settlement or in the open countryside</li> <li>· It is still unclear how will the new use influence the experience of residents</li> <li>· Lacking trust on TAN 15, unless the new version is available</li> </ul>	<p>The Flood Maps for Planning, which are one of the main policy changes in the revised TAN 15, as they include surface water and ordinary water course flooding, together with incorporating an allowance for climate change are a material planning consideration now. Additionally, a Strategic Flood Consequence Assessment based on the revised TAN 15 has been undertaken to support the Replacement LDP</p>
<p>Border Hardcore</p>	<p>Sites should not be deemed to be 'undeliverable' purely based on previous planning refusals. Consideration should be given to the nature of the rejected proposal and the reasons for refusal</p>	<p>A judgement will need to be made on whether sites are deliverable (for successful sites this will be tested at examination). Where a site has received a refusal in the past the reasons for the refusal will be considered. This will include looking to see if the reasons still stand or if any constraints could be mitigated. Sites will not be filtered on the basis of receiving a planning refusal without considering these points.</p>
<p>Border Hardcore</p>	<p>For allowing development and allocations in 'open countryside', it is important to include brownfield</p>	<p>This paragraph should be amended to reflect Table 3, criterion 2 in the candidate</p>

	<p>(pre-developed) sites in the list of exceptions</p>	<p>site assessment methodology. Candidate Sites for employment proposals within or as an extension to an existing employment site maybe acceptable in line with Planning Policy Wales (Edition 11).</p>
<p>Border Hardcore</p>	<ul style="list-style-type: none"> <li>· It should be wise to have a catchment area/influence that is relative to the size of the settlement when establishing if a site is 'closely related' to a settlement</li> <li>· Sites located alongside major arterial routes around larger settlements should not be excluded</li> <li>· Further consideration should be given to sites that surround settlements that themselves have existing development constraints, such as terrain/topography and flood plain</li> </ul>	<p>These are all matters that will be considered in determining the Spatial Strategy (including Settlement Hierarchy) of the Replacement LDP. The Spatial Strategy and revised Settlement Hierarchy will be used in the assessment of Candidate Sites. However successful sites (and the Spatial Strategy) will have to be located in accordance with Planning Policy Wales (Edition 11) and take into consideration the site search sequence.</p>
<p>Border Hardcore</p>	<p>Mentions a charge for access the 'viability model'</p> <ul style="list-style-type: none"> <li>· The Candidate Site process should have no charges since it will exclude viable sites from coming forward</li> <li>· To burden site proposers with further cost on top of the considerable work already required to see a site through to allocation is counter productive at best and likely to disproportionately discourage smaller, independent site proposers from coming forward.</li> </ul>	<p>The viability model has been developed regionally with other authorities in Mid and South-East Wales. The decision to charge for release of the model, which also covers the LPA's review, has been made at the regional level, so the approach is consistent with that of other authorities who use the model. However, as detailed in the Candidate Site Assessment Methodology, the LPA is making the model available free of charge in order for site proposers to undertake the Initial Site Viability Assessment that needs to be submitted at the Call for</p>

		<p>Candidate Sites stage. A fee will be charged for the use of the model at the Detailed Site Specific Viability Assessment stage for those sites that the LPA is considering for allocation within the Replacement LDP.</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Viability Assessment:</p> <ul style="list-style-type: none"> <li>• The content of the viability assessment has not been covered in the report and further guidance will be provided at the call for sites stage</li> <li>• Protected sites, landscape, biodiversity protection and enhancement are expected to be included in the assessment criteria in line with the goals of the Well-being Assessment, especially the Environment chapter - Sustainable Land, Water and Air goals</li> </ul> <p>Phosphate Sensitive Riverine Special Areas of Conservation Catchments:</p> <ul style="list-style-type: none"> <li>• For housing proposals, wastewater will be discharged into a Sewage Treatment Works where phosphorus reduction treatment (including an up-to-date permit) is in place and the works can accommodate additional wastewater within the limits of the environment permit, in order to demonstrate deliverability</li> <li>• Proposals will only be accepted where phosphorus reduction is in place and the works can treat additional wastewater or improvements are planned in an Asset Management Programme (AMP)</li> <li>• Proposals in areas scheduled for phosphorus reduction improvements will need to ensure that the timing of such improvements provide sufficient</li> </ul>	<ul style="list-style-type: none"> <li>• Viability Assessment - Where protected sites may affect the viability of a site through required mitigation measures, site proposers will need to input any extra costs into the Viability Model when undertaking the Detailed Site Specific Viability Assessment.</li> <li>• Phosphate Sensitive Riverine Special Areas of Conservation Catchments - agree the candidate site assessment methodology should be updated to incorporate the suggested text.</li> </ul>

	<p>time to enable development to be delivered within the Replacement LDP period (2022- 2037)</p> <p>Using the term ‘phosphorus reduction’ rather than phosphate stripping as chemical dosing does remove a lot of P in effluent but still leaves a residual amount</p>	
<p>Avison Young/National Grid</p>	<ul style="list-style-type: none"> <li>· Taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites</li> <li>· National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets</li> </ul>	<p>Powys LPA will keep National Grid informed of the Replacement LDP process and will take into consideration the request for: " taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites." when detailed policies are developed.</p>
<p>Natural Resources Wales - Mid Region</p>	<p>the LPA is recommended obtain its own landscape advice at key stages in the process.</p>	<p>Comments noted regarding NRW's remit for landscape</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Site Character and Context:</p> <ul style="list-style-type: none"> <li>· It is suggested that the heading “Site Character and Context” be reworded as Site Land use and Context. Character is associated with landscape and townscape – which is considered in the Landscape and Environmental Impact section</li> </ul> <p>Landscape and Environmental Impact:</p> <ul style="list-style-type: none"> <li>· This section lists all aspects that need to be considered when assessing the impact of development on candidate sites. We suggest the third bullet point of the ‘Landscape’ section is amended as follows: The valued characteristics and qualities of the Powys landscape including dark skies.</li> </ul>	<ul style="list-style-type: none"> <li>· Site Character and Context - Disagree with comments - whether the site is brownfield / greenfield is a characteristic of the site together with its topography not site land use.</li> <li>· Landscape and Environmental Impact - Disagree with comments - dark skies will form an integral part of landscape consideration. However, the detailed approach to dark skies will be applied through policy.</li> </ul>

<p>Cadw</p>	<p>It is strongly recommended that this criterion should be expanded to include all historic assets, whether or not they are formally designated and that the expertise of the Clwyd-Powys Archaeological Trust should be used to assist in considering the issues in regard to this criterion</p>	<p>Agree with comments. The term "Historic Environment Designations" should be changed "Historic Assets"</p>
<p>Border Hardcore</p>	<ul style="list-style-type: none"> <li>· Significance should be given to brownfield sites as well as those that are located alongside major arterial routes around larger settlements</li> <li>· Further consideration should be given to sites surrounding settlements where it is acknowledged that the settlement has major development constraints, such as topography and flood plain</li> </ul>	<p>This will be determined by the Replacement LDP spatial strategy which will be developed over the next six months</p>
<p>Border Hardcore</p>	<p>Table 3 Criterion 2 needs to be amended to ensure brownfield sites located outside settlement boundaries or in open countryside are not rejected without evaluating the merits of developing the brownfield land</p>	<p>The Powys Replacement LDP must align with the policies in Planning Policy Wales. Planning Policy Wales promotes the use of sustainable previously developed land within or adjacent to settlements. However, if no sustainable previously developed land within or adjacent to a settlement is available greenfield sites within or adjacent to settlements can be utilised. However, it is recognised that some employment industries have specific land requirements that cannot be accommodated in settlements. In these cases, the justification tests from Technical Advice Note (TAN) 23 will need to be applied (jobs accommodated, alternatives and special merit). It is proposed that Table 3. Criterion 2 is amended to reflect the TAN 23 tests.</p>

<p>Border Hardcore</p>	<p>Table 5 Criterion 4 - There is no mention where previously developed land away from settlements would rank in this table. I would think this should be in Amber</p>	<p>It is recognised from these and other comments made by the respondent that the candidate site assessment methodology may have been excluding sites that were acceptable through National policy. Particularly, the Technical Advice Note 23 justification tests (relating to jobs accommodated, alternatives, and special merit). Therefore, it is proposed that Table 5. Criterion 4 is amended to prevent such sites being discounted from the process.</p>
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<p>C7 does not prevent development in areas of air pollution/poor amenity</p> <p>C11,12 traffic impacts on other interests/amenity/nature</p> <p>C13 Ancient Woodland? C 13,14 and 32 will not support ecosystem resilience which depends on conservation/creation/enhancement of critical wildlife habitats</p> <p>C18,19 Risk of exacerbating flood risk</p> <p>C32 an invitation to greenwash development with a minimal addition. It MUST be reworded to reflect overall biodiversity impacts.</p> <p>C15,16 require expertise PCC may not have. C16 depends on a Local Landscape Character Assessment we have not seen.</p> <p>C30 does PCC have sufficient expertise to scrutinise a net zero carbon report?</p> <p>C31 depends on future guidance</p>	<p>Table 6 Criterion 7 - text amended to include 'Air' and 'Nearby' Tables 12,13, Criteria 11,12 - The points made will be covered and taken into consideration as part of the assessment against the criteria. Table 14 Criterion 13 - Ancient Woodlands in the list under 6.2.9. Paragraph 6.2.9 and criteria 32 enhancements - Enhancements will be further supported through Replacement LDP policy. Further Criteria 32 comments (regarding box ticking exercise) - The Candidate Site process is aimed at selecting allocations for the Replacement LDP, development proposals will be further refined against policies at the planning application stage. Tables 19,20 Criteria 18,19 - The criteria contained in section 11 of TAN 15 includes the consideration of the impact to flood risk elsewhere. Availability of Local</p>



		Landscape Character Assessment - This document will be made available for the call for sites. Criteria 31 Placemaking: Comments noted
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	<ul style="list-style-type: none"> <li>· Poor wording and confused</li> <li>· "Varying scales of positive or negative (or negligible) impacts" unclear</li> <li>· Surely, the detailed site assessment should have already assessed the impacts of the site "in the context of its environment"</li> <li>· The ISA site assessment should be a an overall check according to the Objectives of the ISA. Suggest: "the scoring of the site according to the different environmental impacts reflecting the ISA Objectives"</li> </ul>	Comments noted. The wording of this sentence to be amended to improve clarity.
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	Clear description. No comment	Comments noted.
Newtown & Llanllwchaiarn Town Council	In line with the policies in the Newtown Place Plan SPG, the Town Council particularly supports the wide-ranging Objectives (1-15) of the Proposed ISA Site Appraisal Framework. These encompass important community considerations such as Health & Wellbeing, Culture & Heritage, which may previously have fallen outside of the "traditional" planning process	Support for the wide-ranging objectives of the proposed ISA site assessment framework is noted
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	<p>The ISA has a list of Objectives but projects are assessed on answers to narrow questions which do not properly reflect the objectives (or even the questions in the case of Objective 5). This does not look like a guarantee of sustainability.</p> <p>"2. Distances calculated from a site to roads and footpaths with measurements to be taken from the</p>	The comment regarding the scope of the questions is noted. Where appropriate, the site assessment criteria have been refined in order to more closely reflect the relevant Objectives. The wider ISA assesment framework that will be used to test the sustainability performance of other elements of the

	<p>boundary of the site where it is within 20 metres of the road/ footpath network and is therefore assumed to have access." We do not understand this. The boundary of the site may not be within 20m of the road/footpath network. It could be even closer and still not have access because of barriers, third party land etc. Suggest rewording.</p>	<p>Replacement LDP will include a broader range of assessment questions. However, as advised in national guidance and best practice, the site assessment framework needs to include more location specific criteria to ensure a consistent approach towards the assessment. The ISA site assessment process will be undertaken alongside the wider Candidate Site Assessment process used to test the sustainability, deliverability and viability of sites. The explanation of the use of GIS to calculate distances will be simplified. In some cases, judgements will need to be based on a more precise understanding of the circumstances of the site.</p>
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<p>Obj. 5: Q1. Where is the evidence that general health and well-being mostly depends on proximity to a GP surgery? A new processed food retail site, vaping outlet or cigarette stall at a school gate could pass this assessment and a new cancer treatment site might fail it. This is nonsense in a rural area. Q2 not reflected in scoring table at all.</p>	<p>The site appraisal questions and assessment questions ISA Objective 5 has been reviewed in order to capture a wider range of health and well-being related features. The potential for access to facilities and spaces using sustainable transport has also been captured</p>
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<p>Obj. 7. Scoring table does not reflect question Q and does not guarantee no adverse impact on water-quality. Suggestion: Scoring should be against NET impact and "could" should be replaced by "WILL" . ".....incorporation of THE PROPOSED off-site measures....." But the amended text is not sufficient: There is no mention of hot weather impacts, drought, water consumption, conservation of water resources, surface or ground water extractions, variety of potential pollutants entering freshwater</p>	<p>The site appraisal questions and assessment criteria have been reviewed to ensure that water resources are also captured. Matters referred to be will be part of detailed implementation and will be considered in consultation with the relevant water bodies.</p>

	features. The Severn will not be protected by SAC specific measures.	
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	Obj.8. Air pollution is not limited to travel impacts: there are also polluting industrial and other emissions, agricultural emissions and the potential of the combination of ammonia and NOx from increased traffic. These are all potentially harmful to biodiversity and to human health	Agricultural emissions will not be relevant to the assessment of candidate sites given the nature of the uses that will be assessed for allocation. The wider SA assessment framework reflects the consideration of environmental effects, including ammonia. ISA Objective 8 has been reviewed in order to capture potential effects of air pollution on both human health and the natural environment.
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	Obj.9. How can you have assessment criteria with no way of assessing?	This ISA topic has been scoped out of the ISA site assessment framework as all development proposals are likely to contribute towards this through their design and waste management. These details will be assessed as part of the detailed design stage and, therefore, it would not be possible to score sites on this basis. This topic will, however, be considered in assessing other elements of the Replacement LDP as part of the wider ISA assessment framework.
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	Obj.10. Q. about freedom from flood risk does not cover all "climate change effects" or "other extreme events" in Objective 10. No mention of extreme hot weather, drought, surface or ground water extractions etc (see Objective 7). No mention of nature resilience/recovery	ISA objective 10 has been reviewed in order to reflect other climate change effects, beyond flood risk, focusing on the role of green infrastructure to support climate change adaptation
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	Obj.11. Q. does not reflect objective. The Score Criteria should be looking at the NET GHG impact from the proposal rather than "contributions".	The wording of ISA objective 11 site appraisal question has been amended to focus on the scope for energy reduction/renewable energy on the site, rather

		<p>than on co-location of commercial and residential uses. The ISA site assessment process is focused on assessing the existing site and how it's development could contribute towards the objective, rather than assessing a specific proposal for the site. It is, therefore, not possible to calculate the amount of emissions generated by a specific proposed development as part of the ISA site assessment framework</p>
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<p>Obj.14. This is a rag-bag of an objective. The score criteria are mixed. 2 are about unspecified constraints and enhancements and 3 are about designations. Constraints should be specified and include non-designated habitats such as Powys Biodiversity Action Plan Priority habitats. "Enhancements" should be "NET enhancements" to avoid box-ticking with a few bird boxes etc. minor planting. No mention of off-site impacts.</p>	<p>The site appraisal criteria for ISA Objective 14 has been reviewed in order to focus on the potential for adverse effects from development of the site on both national and local sites, habitats and priority/protected species. This will also make it clear that any impact, including off-site impacts, are to be considered. The type of designations to be considered are included in the site appraisal criteria. Net gain is a concept used in England and is not currently used in Wales</p>
<p>Campaign for the Protection of Rural Wales (CPRW) Brecon &amp; Radnorshire Branch</p>	<p>Obj 15. refers to Landmap whereas C15 in the site assessment refers to Local Landscape Character Assessment (see back). Clarity essential</p>	<p>ISA objective 15 has been reviewed in order to capture the Powys Local Landscape Character Assessment for consistency with Criterion 15 of the Candidate Site Assessment Methodology</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F1) Issue: Proposed ISA Site Appraisal Framework Comment: The site appraisal framework should enable the answering of four initial identified key questions. The first question asks: Is the site in a sustainable</p>	<p>The questions set out in introducing the ISA site assessment framework are derived directly from the Development Plans Manual (DPM3) and provide a framework for more detailed criteria-based consideration of suitability. No changes</p>

	<p>location in accordance with the site search sequence set out in Planning Policy Wales 11 (PPW)? We would like to point out that section 3.30 of PPW makes clear reference to the adoption of SMNR principles within the plan. We also advise that it should be in line with the aims and objectives of the Mid Wales Area Statement, and this should be captured by the question. The second question asks: - Is the site generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution? The reference to biodiversity and landscape is very generic. We would welcome the addition of the following matters as a means of flagging potential adverse significant effects from candidate sites: 1. Within or likely to affect the national site network sites and Ramsar sites [aligned with findings of HRA]. 2. Within or likely to affect a site of special scientific interest; or is within a consultation area around a SSSI notified to the LPA by NRW. [1 and 2 aligned with any HRA / other findings of assessments of air quality impacts on designated conservation sites: Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report   JNCC Resource Hub]. 3. Within or likely to affect National Nature Reserves (NNR) [within 1000m]. 4. Likely to affect European Protected Species (EPS) / nationally fully protected species protected under the Wildlife &amp; Countryside Act [Survey/ LERC (Local Environmental Records Centres) records of EPS/WCA protected species and birds within reasonable proximity of the candidate site]. 5. Likely to affect the purposes of National Parks or Areas of Outstanding Natural Beauty [Designated landscapes within 2000m (homes)/ 10,000m (industrial or energy generation and</p>	<p>are proposed to this paragraph, however the specific elements mentioned by the representor will be captured in amendments made to the detail of the relevant ISA objectives. In response to point 7, the zones referred to are unlikely to be relevant to the candidate site assessment process, for instance Nitrate Vulnerable Zones are aimed at agricultural development. In response to point 8, the Candidate Site Assessment Methodology includes a criterion relating to contaminated land risks and, therefore, proximity to landfill will be considered in that assessment.</p>
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	<p>distribution)]. 6. Flood Map for Planning [aligned with findings of SFCA]. 7. Involving groundworks and/or non-mains foul or surface water disposal within Source Protection Zones, Nitrate Vulnerable Zones, or defined water protection zones. 8. Involving groundworks upon historic closed landfills or within 250m of an active open landfill</p>	
<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F4)</p> <p>Issue: ISA Objective 5 – To Improve the health and well-being of all sectors of society</p> <p>Comment: We note the two site appraisal questions for this objective try to encompass the aims of other relevant and more specific five questions that have been identified for the same objective within the section 4 of the report. We suggest you modify the questions' wording as such: - Is the site located so as to encourage health and wellbeing including access to healthcare, physical activity, active travel, natural green space, community interaction and engagement? - Could the site contribute to the provision of facilities, including green infrastructures, which promote health and well-being? The importance for local communities to have access to green public spaces for health and wellbeing has not been captured by the Appraisal Criteria which focuses purely on proximity to GP surgeries. We suggest distance from green public spaces and how they connect to the development site should also be considered.</p>	<p>ISA objective 5 has been reviewed in order to reflect a wider range of health and well-being facilities and features</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F5)</p> <p>Issue: ISA Objective 6 – To make the best use of previously developed land and existing buildings and protect higher grade agricultural land</p>	<p>Planning Policy Wales makes it clear that sites of nature conservation value are excluded from the definition of previously developed land and, therefore, such sites will not be treated as previously</p>

	<p>Comment: The objective is clearly designed to protect higher grade agricultural land and direct development to brownfield land. However, the criteria does not consider whether brownfield land has other constraints associated with it that need further consideration under other objectives. There is scope for improving the wording of higher score to: The site is entirely brownfield land and is within or on the edge of an existing settlement and does not have a high biodiversity value.</p>	<p>developed land as part of the site assessment process. ISA objective 14 also addresses biodiversity protection. An additional site appraisal question relating to previously developed land. Reference to brownfield land will be amended to refer to previously developed land to avoid any doubt around definitions</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F7)                  Issue: ISA Objective 10 - To support the resilience of Powys to the potential effects of climate change, including flooding and other extreme events</p> <p>Comment: The objective aims to secure Powys' resilience against the effects of climate change, and yet the supportive question purely refers to flood risk and no other risks related to loss of environmental assets such as woodland, peatland and other important wildlife habitats that would adversely impact on climate resilience if affected by development. There is also no focus on key design aspects of development that would make a project more environmentally friendly. The appraisal criteria would benefit from inclusion of statements such as: - Development at the site to improve and extend green infrastructure networks to support climate change adaptation. We refer you to the WG ambition and commitment to create a connected National Forest for Wales. - The development increases resilience to the effect of climate change through the good use of green architectural design.</p>	<p>ISA objective 10 has been reviewed in order to reflect other climate change effects, beyond floodrisk, focusing on the role of green infrastructure to support climate change adaptation. Suggestion regarding reference to green architectural design is noted, however this is a matter for the detailed design stage and, therefore, cannot be captured as part of the ISA site assessment. The Representor has also made to Flood Map for Planning</p>

<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F9) Issue: ISA Objective 14 – To conserve and enhance biodiversity and geodiversity and promote improvements to the multifunctional green infrastructure network  Comment: The red score 00 appraisal criteria for this objective states: The site intersects or is adjacent to an internationally (SAC, SPA, Ramsar) or nationally (SSSI, Ancient Woodland) designated site. We would like to point out that detrimental impact on protected sites is not limited to development which ‘intersects or is adjacent to’ any such site. Depending on the nature of the development and the features of the site affected, detrimental impact can occur at much higher distances. This is particularly true for developments affecting levels of nutrient deposition (ammonia and nitrates) and mobile species such as breeding and overwintering birds at designated site</p>	<p>The site appraisal criteria for ISA Objective 14 has been reviewed in order to focus on the potential for adverse effects from development of the site on both national and local sites, habitats and priority/protected species. National Nature Reserves also to be captured. This will also make it clear that any impact, including off-site impacts, are to be considered. The type of designations to be considered are included in the site appraisal criteria</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Appendix F (Page number F10) Issue: ISA Objective 15 – To protect the quality and diversity of the County’s landscapes and townscapes  Comment: We note the appraisal criteria for this objective refers to LANDMAP. The use of LANDMAP is good for strategic planning of large development sites in open countryside and Powys Local Landscape Character Assessment will help highlight landscape characteristics, landscape qualities and sensitivities within broad landscape units. However, site level appraisal remains necessary for understanding the visual context and site features. We recommend some additional appraisal criteria be added below Table G15 to help factor in the local planning considerations: “Development of the site protects and enhances local</p>	<p>ISA objective 15 will be amended to include reference to the Powys Local Landscape Character Assessment. This Assessment will include guidance on local landscape considerations and will be accompanied by a User Guide. Therefore, it would not be appropriate to include the local appraisal criteria as suggested by the Representor as part of the ISA site assessment framework. The Representor has also referred to National Parks and AONB, which will also be captured in these amendments.</p>



	<p>landscape / settlement character as determined through LANDMAP, Powys Local Landscape Character Assessment, and local appraisal criteria” We therefore suggest a Local appraisal criteria is added and considers the following: The allocation and development of the site has the potential to:</p> <ul style="list-style-type: none"> <li>• Form a logical extension to settlement and complement the historic form and character of the town/village;</li> <li>• Avoid development intrusion into open countryside in a way that weakens its conservation within future LDP reviews;</li> <li>• Be appropriately contained by existing landscape elements such as field boundaries, trees, woodland, topography with minimal need for additional mitigation;</li> <li>• Give sufficient space in the layout for existing seminatural habitats, hedgerows, trees, woodland and waterbodies of the site to be conserved and enhanced and function as GI networks. Housing numbers can then be more accurately calculated to reflect the capacity/viability of the site. The settings of listed buildings and SAMs can be factored in a similar way);</li> <li>• Avoid prominent locations in the landscape such as skylines, elevated locations, overlooked sites - unless good attention to placemaking, townscape design, local distinctiveness and integration can be secured through the LDP policy and/ or SPG;</li> <li>• Form a new ‘gateway’ to towns and villages, supporting good attention to placemaking, townscape design, local distinctiveness and integration, secured through the LDP policy and/ or SPG</li> </ul>	
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## Appendix 2: Introduction to the Integrated Sustainability Appraisal (ISA)

Consultation Document	No. of Representations received
Introduction to Integrated Sustainability Appraisal (ISA)	9

**Table Showing the Main Issues Identified from the Targeted Consultation on the Integrated Sustainability Appraisal and the Council Response**

Respondent	Issue / Representation	Council Response
Comisiynydd y Gymraeg/ Welsh Language Commissioner	<p>Cynllun Datblygu Lleol Newydd Powys – Ymgynghoriad ar y Prosesau Asesu</p> <p>Diolch am y cyfle i gymryd rhan yn yr ymgynghoriad hwn, wrth i'r Cyngor ddechrau paratoi ei Gynllun Datblygu Lleol (CDLI) newydd. Bydd ein sylwadau yn canolbwyntio ar faterion yn ymwneud â'r Gymraeg yng nghydestun y Fframwaith Arfarnu Arfaethedig a'r Arfarniad o Gynaliadwyedd Integredig.</p> <p>Cefnogwn Amcan 4 y Fframwaith, sef "Gwarchod, hyrwyddo a gwella'r iaith Gymraeg a'i diwylliant", sydd yn ei dro yn cefnogi'r Nod Llesiant Cenedlaethol, "Cymru â diwylliant bywiog lle mae'r Gymraeg yn ffynnu". Nodwn fod pedwar cwestiwn ar gyfer asesu polisiâu yn erbyn Amcan 4. Rydym yn cefnogi'r ystod eang o ffactorau a ystyrir, o gyfleoedd i hyrwyddo a datblygu'r Gymraeg, cynaliadwyedd cymunedau Cymraeg, addysg Gymraeg a dysgwyr Cymraeg o bob oedran, i wasanaethau Cymraeg o bob math.</p> <p>Yn ogystal â'r cwestiynau uchod, gofynnwn i'r Cyngor sicrhau fod yr Arfarniad o Gynaliadwyedd Integredig yn ystyried Cynllun Strategol Cymraeg mewn Addysg (CSGA) 2022-2032. Nodir yn y CSGA bod "cyfle hefyd i sicrhau bod datblygu addysg</p>	<p>Nodwyd y gefnogaeth.</p> <p>Dyfynnir Strategaeth Hybu'r Gymraeg (2017-22) a'r diweddariad sydd ar ddod (2023-27) ar dudalen 59 fel rhan o'r ystyriaeth o'r Gymraeg. Pan fydd y diweddariad ar gael, gellir diwygio'r Adroddiad Cwmpasu a'r Arfarniad o Gynaliadwyedd Integredig yn unol â hynny, cyn y cyflwynir y CDLI.</p> <p>Bydd Cynllun Strategol y Gymraeg mewn Addysg (Cyngor Sir Powys, Medi 2022 - Awst 2032) yn cael ei ystyried gan y polisiâu yn y CDLI Newydd, gyda'r Arfarniad o Gynaliadwyedd Integredig yn gwerthuso effeithiau tebygol drwy Amcanion yr Arfarniad o Gynaliadwyedd Integredig sy'n cynnwys cyfeirio at ddiogelu a hyrwyddo'r Gymraeg drwy amrywiol ffyrdd, gan gynnwys addysg.</p> <p>Yn y cyfamser, comisiynwyd IAITH Cyf gan Gyngor Powys i adolygu elfennau o ran yr iaith Gymraeg yn yr Adroddiad</p>

	<p>cyfrwng Cymraeg yn ganolog i holl bolisiâu a strategaethau'r Cyngor ar draws pob maes gwasanaeth, gan gynnwys Cynllun Datblygu Lleol Powys". Dylai CDLI newydd y Cyngor hyrwyddo amcanion y CSGA.</p> <p>Dylai'r Arfarniad hefyd ystyried Strategaeth Hybu'r Gymraeg 2017-2022 a luniodd y Cyngor yn unol â'r safonau hybu a osodwyd arno. Un o feysydd blaenoriaeth y strategaeth yw "Dylanwadu ar symudiadau poblogaeth", sy'n cynnwys yr amcan canlynol: "Edrych ar gamau pwrpasol i ddylanwadu'n gadarnhaol ar bolisi tai a chynllunio, gan sicrhau fod asesiadau effaith ieithyddol yn cael eu gweithredu fel rhan o'r broses gynllunio". Dylai'r Cyngor egluro sut y bydd y CDLI yn cyfrannu at gyrraedd y targed a bennir yn y strategaeth ar gyfer cynyddu neu gynnal nifer y siaradwyr Cymraeg yn yr ardal. Nodwn fod y strategaeth bresennol yn agosáu at ddiwedd ei chyfnod. Dylai CDLI newydd y Cyngor hyrwyddo amcanion a tharged y strategaeth newydd pan gaiff ei llunio.</p> <p>Gobeithiwn y bydd y sylwadau hyn o ddefnydd wrth i chi baratoi'r CDLI. Mae croeso i chi gysylltu petai chi'n dymuno trafod y materion uchod ymhellach.</p> <p>Translated:</p> <ul style="list-style-type: none"> <li>· We support Objective 4 of the Framework, that is "To protect, promote and enhance the Welsh language and culture", which in turn supports the National Well-being Goal, "A Wales of vibrant culture and thriving Welsh language"</li> <li>· We note that there are four questions for assessing policies against Objective 4</li> <li>· We support the wide range of factors considered, from opportunities to promote and</li> </ul>	<p>Cwmpasu. Gwnaed nifer o argymhellion, gan gynnwys diwygiadau i'r Amcanion a'r meini prawf asesu, a chafwyd eu hymgorffori yn fersiwn gyfredol yr Adroddiad Cwmpasu. Mae adroddiad Iaith Cyf ar gael ar wahân.</p> <p>Translated:</p> <p>Support noted.</p> <p>The Welsh Language Promotion Strategy (2017-22) and forthcoming update (2023-27) is cited at p.59 as part of the consideration of the Welsh language. When the update is available, the Scoping Report and ISA can be revised accordingly, in advance of the submission LDP.</p> <p>The Welsh Education Strategic Plan (Powys County Council, September 2022 – August 2032) will be taken into account by policies in the Replacement LDP, with the ISA appraising likely effects through the ISA Objectives which include reference to the protection and promotion of the Welsh language through various means, including education.</p> <p>Meanwhile, IAITH Cyf. was commissioned by Powys Council to review the Welsh language components of the Scoping Report. Numerous recommendations were made, including revisions to Objectives and assessment criteria, which were incorporated into the current version of the Scoping Report. IAITH Cyf's report is available separately.</p>
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	<p>develop the Welsh language, the sustainability of Welsh-speaking communities, Welsh-medium education and Welsh learners of all ages, to Welsh language services of all kinds.</p> <ul style="list-style-type: none"> <li>· The Council’s new LDP should further the objectives of the WESP</li> <li>· The Council should explain how the LDP will contribute to meeting the target set in the strategy for increasing or maintaining the number of Welsh speakers in the area</li> <li>· It is noted in the WESP that “there is also an opportunity to ensure that the development of Welsh-medium education is central to all Council policies and strategies across all service areas, including the Powys Local Development Plan”</li> <li>· The council’s new LDP should promote the objectives and target of the new strategy when it is drawn up</li> <li>· The Appraisal should also consider the 2017-2022 Welsh Language Promotion Strategy which the Council produced in accordance with the promotion standards imposed on it. One of the priority areas of the strategy is to “Influence population movements”, which includes the following objective: “Look at appropriate steps to positively influence housing and planning policy, ensuring linguistic impact assessments are conducted as part of the planning process”</li> <li>· The Council should explain how the LDP will contribute to meeting the target set in the strategy for increasing or maintaining the number of Welsh speakers in the area. We note that the current strategy is nearing the end of its term</li> </ul>	
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	<ul style="list-style-type: none"> <li>· The council’s new LDP should promote the objectives and target of the new strategy when it is drawn up</li> </ul>	
Newtown & Llanllwchaiarn Town Council	We support the approach of the Consultation and welcome the fact that the important community considerations such as Health & Wellbeing, Culture & Heritage, which may previously have fallen outside of the “traditional” planning process.	Support for the approach and matters to be considered as part of the Integrated Sustainability Appraisal is noted
Clwyd-Powys Archaeological Trust	Do you agree with the proposed approach to the ISA of the Local Development Plan? Yes	Support is noted
Cadw	An ISA produced following this scoping will properly consider the impact of the proposed Powys RLDP on the historic environment	Comment regarding historic environment considerations as part of the ISA process is noted
Natural England	<ul style="list-style-type: none"> <li>· Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development</li> <li>· Natural England does not consider that this Candidate Site Assessment Methodology &amp; Plan-making Assessment Process poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation</li> <li>· The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document</li> </ul>	This representation confirming no comment on the plan-making assessment process is noted

	<p>· If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again</p>	
Mineral Products Association Wales	<p>Whilst in general we are supportive of the approach outlined, it is important that the proposed policy application becomes more robust in areas such as minerals safeguarding. Our concerns are detailed in Appendix 1. Note: Appendix 1 provides a copy of the representation made in response to the consultation on the Review Report in January 2022.</p>	<p>Reference to policy development noted - to be considered against ISA as the LDP emerges.</p>
Clwyd-Powys Archaeological Trust	<p>Do the ISA objectives and guide questions that comprise the ISA Framework cover a sufficient range of environmental, social, cultural and economic topics? Yes</p>	<p>Support is noted.</p>
Cadw	<p>The ISA scoping identifies the Historic Environment as a topic, along with the key issues. It also states that one of the ISA objectives (No.13) is "To preserve and enhance the Powys' heritage resource, including built and archaeological assets" and poses questions to consider in the ISA</p>	<p>Support for the ISA objective relating to historic environment is noted</p>
Mineral Products Association Wales	<p>ISA Objective 1: - The Council must ensure proposed allocations fully reflect Minerals Safeguarding Areas and ensure mineral resources are not needlessly sterilised through lack of robust consideration in both the development plan and development management processes</p> <p>Objective 2: The Council must also give due regard to the RTS 2nd Review and any associated SSRC. The evidence base for the RTS is developed around mineral reserve figure from December 2016. The Council should there give due</p>	<p>Objective 9 guide question amended to:</p> <ul style="list-style-type: none"> <li>• Will the policy or proposal Safeguard mineral resources?</li> </ul> <p>Para 3.11 states: Powys contains many material assets of national and regional importance which should be safeguarded. These include mineral resources, strategic transport and utilities infrastructure and location specific infrastructure as</p>

	<p>consideration to updating the reserve evidence base which should be considered in light of future development aspirations. The Council will also need to consider local vernacular and ensure local materials are deliverable to maintain design standards.</p> <p>Objective 3: - No additional comments</p> <p>Objective 4: - No additional comments</p> <p>Objective 5: - Restored quarries provide excellent opportunities for nature conservation and public access, where appropriate, for health and well being. The industry will continue to deliver high quality restoration.</p> <p>Objective 6: - No additional comments</p> <p>Objective 7: - There may be opportunity for restored quarries to be used to deliver long term water storage options.</p> <p>Objective 8: - The minerals industry continues to control emissions to air in accordance with best practice. It is important to remember that minerals can only be worked where they are found.</p> <p>Objective 9: - We are again generally supportive of the objective, including Promoting the use of locally sourced sustainable materials? however it is unclear what is meant by “Create opportunities to safeguard protected mineral resources?” National policy is not about “creating opportunities” to safeguard mineral resources but actually safeguarding resources from unnecessary sterilisation.</p> <p>Objective 10: - The minerals industry remains committed to addressing the effects of climate change. A sustainable minerals supply will be critical in addressing climate change through the delivery of green energy infrastructure.</p>	<p>well as waste facilities and soils.</p>
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	<p>Objective 11: - The minerals industry is committed to meeting climate change objectives Objective</p> <p>12: - Again, the mineral industry is committed to meeting climate change targets, however, in terms of land use, minerals can only be worked where they occur. The use of EVs and alternative fuels for quarry plants is dependent upon manufacturers with whom the industry is working closely with.</p> <p>Objective 13: - Local vernacular will be dependant upon a sustainable source of local building materials.</p> <p>Objective 14: - The industry will continue to deliver appropriate biodiversity enhancement and net benefit. Objective</p> <p>15: - The temporary use of land associated with minerals development will continue to manage landscape impacts through appropriate short-term mitigation and longer term management and enhancement</p>	
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### Appendix 3: Introduction to the Habitats Regulations Assessment (HRA) Process

Consultation Document	No. of Representations received
Introduction to Habitats Regulations Assessment (HRA) Process	6

**Table Showing the Main Issues Identified from the Targeted Consultation on the Habitats Regulations Assessment and the Council Response**

Respondent	Issue / Representation	Council Response
Natural England	<ul style="list-style-type: none"> <li>· Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development</li> <li>· Natural England does not consider that this Candidate Site Assessment Methodology &amp; Plan-making Assessment Process poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation</li> <li>· The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document</li> </ul> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006,</p>	This representation confirming no comments on the plan assessment processes is noted

	please consult Natural England again	
Campaign for the Protection of Rural Wales (CPRW) Brecon & Radnorshire Branch	<p>Discussion of HRA assessment is ongoing.</p> <p>Air Quality: CPRW notes that there is no mention of rising ammonia levels in Powys. Ammonia is affecting plant biodiversity and protected habitats. The impacts are cumulative with traffic emissions.</p> <p>" 'In combination' effects associated with the proposals of other plans" is not satisfactory as recognition of one of the most serious threat to protected nature sites. Rising Ammonia levels and their impacts should be spelt out.</p>	<p>Comments regarding other sources of air pollution, including ammonia levels, are noted and will be addressed through amendments to the document. This section already captures in-combination effects</p>
Newtown & Llanllwchaiarn Town Council	<ul style="list-style-type: none"> <li>- We would support the approach of the four-stage process for meeting the relevant legislative tests of the Habitats Regulations</li> <li>- No information is given regarding the over abstraction of water from the River Severn at certain points throughout the year. We feel this should be taken into consideration.</li> <li>- We question why there is no inclusion of the River Severn within the consideration of Water Quality and Nutrient Neutrality given by Natural Resources Wales (NRW)</li> </ul>	<p>Support for the four-stage approach towards HRA is noted. The scope of the HRA is limited to assessing the effects on sites that are designated under the National Site Network. The River Severn itself is not a designated site according to the HRA regulations and, therefore, does not directly fall within the scope of the HRA. The Severn Estuary is a designated site and, therefore, the potential for hydrological linkages will be assessed as part of the HRA. Water abstraction is a matter for Natural Resources Wales. Nutrient neutrality issues result from the designation of rivers, such as the River Wye and River Usk in Powys, as Special Areas of Conservation</p>
Natural Resources Wales - Mid Region	<p>-Potential HRA Issues for the Powys Replacement LDP Air Quality Comment: On the issue of Air Quality (AQ) in Powys, we would like to draw attention to the evidence base of the Powys 2022 Wellbeing Assessment, and</p>	<p>Comments regarding other sources of air pollution, including ammonia levels, are noted and will be addressed through amendments to the document. The more</p>

	<p>specifically Chapter 6 -Environment, where NRW provided evidence in line with the Mid Wales Area Statement (currently being updated) on AQ in Powys. The issue of AQ goes beyond the effects of traffic increases. We therefore suggest this section of the report is rephrased to remove the emphasis of the issue being principally related to the consideration of effects due to traffic increases. The full Powys Wellbeing Assessment 2022 can be found here: Full Well-being assessment analysis - Powys County Council We have also developed a framework that allows for the appropriate protection of our most sensitive sites as well as allowing us to assess cumulative impacts of existing and new developments. This means that prevailing environmental conditions (i.e. background ammonia concentrations) are part of the assessment process and even a relatively small addition can be refused if it causes a breach of the environmental threshold or exacerbates a threshold that is already breached (ammonia critical levels). The guidance reflects current European and UK case law and is published by NRW as GN020 and is used by NRW for permitting and planning as well as by LPAs. Natural Resources Wales / Ammonia assessments: initial screening and evidence gathering (GN 020) We suggest that the HRA process takes due consideration of the impacts of ammonia from intensive agriculture and rural business enterprises as detailed in the link above.</p>	<p>detailed matters will be considered as part of the full HRA Scoping document.</p>
<p>Natural Resources Wales - Mid Region</p>	<p>Water Quality and Nutrient Neutrality</p> <p>Comment: We note the use of the word 'phosphate' within this section, we suggest this is replaced by the word 'phosphorus' in line with the terminology of our published</p>	<p>Request to replace wording for 'phosphate' with 'phosphorous' noted and agreed to amend accordingly</p>

	<p>guidance which this section refers to.</p>	
<p>Natural Resources Wales - Mid Region</p>	<p>Potential HRA Issues for the Powys Replacement LDP</p> <p>Comment: Whilst we appreciate Air Quality, Public Access/Visitor Pressure and Water Quality/Nutrient Neutrality are the key issues likely to affect designated sites, the list does not include issues such as threats from Invasive Non Native Species and pollution associated with works on development sites.</p>	<p>The Introduction to the HRA was intended to highlight the main potential HRA issues for the Powys Replacement LDP. A range of other issues, including invasive and non native species, will be considered as part of the HRA process and will be captured in the full HRA Scoping Report</p>

## Appendix 4: Draft Key Issues, Vision and Objectives (KIVO) for the Powys Replacement LDP

Consultation Document	No. of Representations received
Draft KIVO (Consultation Paper)	120

### Table Showing the Representations made on the Draft KIVO during Public Consultation and Council Response

#### *Question 1 – Have we captured all the Key Issues? If not, what have we missed?*

Representor	Representation	Council Response
Anon 1	Does it matter - you will do as you wish anyway	The Council is committed to Community Involvement, Engagement and Consultation which are important parts of the Development Plan process.
Anon 2	An excessive focus on the 'climate emergency' which is a political ideology not a scientific or planning issue.	Thank you for your comments but the driver for this approach is the fact that climate and nature emergencies have been declared by Welsh Government and Powys County Council.
Anon 3	Yes	Noted
Anon 4	This is a 2022 to 2037 vision. It is a vacuous document that is already 2 years late. Has it not escaped PCC that we are now in 2024 !	Noted, however the Plan period is set at 15-years and 2022 is the start date/base date of the evidence gathering for the emerging Plan.
Anon 6	....according to the Powys replacement LDP 2022-2037.....which I have just waded through I think you have over covered all the Key issues. I think the plan could have been reduced and simplified and the verbose jargon halved. You have not missed any issues affecting Powys in the 2020s.	Comments noted. Please be advised this document is not the Replacement Plan itself but will form the foundations to further detailed stages.
Anon 7	The list of key issues is comprehensive and well assessed.	Noted, thank you.
Anon 8	With regards to <b>Key Issue 17</b> we welcome and support policy which will ensure the retention of valued facilities.	Support for this Key Issue noted.

<p>Anon 10</p>	<p>There is no mention in this document regarding the standards of building? i.e. better built, eco friendly homes, cheaper to heat, and maintain etc there is no mention of accountability / enforcement when developers do not adhere to conditions - enforcement is accepted as a complete joke</p>	<p>Comments noted. The matter of building standards has also been raised by others. Wording changes have been made to KI.10 and KI.11 and Objective 9. The finer detail of design standards will be considered in the later stages of preparing of the Plan.  Please note that enforcement is a matter for development management outside of the new plan preparation.</p>
<p>Anon 11</p>	<p>Yes I believe so</p>	<p>Noted</p>
<p>Anon 12</p>	<p>I think you have captured the key issues.</p>	<p>Noted</p>
<p>Anon 13</p>	<p>The “Verlon” designated site is known for its landscape and far ranging views from the castle, houses directly below will affect this 180 landscape view as recently quoted in a newspaper, the best far reaching views this editor had seen for a longtime.</p>	<p>This comment is related to a current allocated housing site in the Adopted LDP and as such is not a matter for this consultation.</p>
<p>Anon 14</p>	<p>Has fair consideration been made to all the original sites proposed in Montgomery e.g. Kerry road, the debate at the original meeting was very one sided, has anyone ever asked was the consultation publicised properly in Montgomery.</p>	<p>This comment is related to a current allocated housing site in the Adopted LDP and as such is not a matter for this consultation.</p>
<p>Anon 15</p>	<p>There are so many considerations and I believe this document has this well covered.</p>	<p>Noted</p>
<p>Anon 16</p>	<ol style="list-style-type: none"> <li>1. Water quality should be higher up the list of priorities given the very high profile river problems we have.</li> <li>2. Flood prevention should be higher up also. Lack of action to slow the flow in the Powys water tables is going to backfire badly</li> </ol>	<p>Points 1. and 2. Whilst the Key Issues are not listed in any priority order, wording has been added to KI.2 and KI.3 re: river problems. Both water quality and flood prevention are matters which the emerging Plan will look to address further as detailed policies develop.</p>

	<p>when a city like Newport takes the hit.</p> <p>3. There should be reference to Race to Zero, which Powys is hopefully joining. This will mean reducing not just Council emissions (just 2% of the total), but all territorial emissions including imported goods. This shift highlights that the biggest generator of carbon emissions in our region is food &amp; drink consumption, which establishes a new agenda around growing the supply and consumption of locally grown fruit &amp; veg.</p>	<p>Point 3. The Replacement Plan will need to align to other corporate strategies and ambitions. It will take account of the Well-being Plan aspirations including the work of the Public Service Board (who are responsible for the Well-being Plan) on the Powys-wide Climate project/action plan. As yet, it isn't considered necessary to add Race to Zero to the Replacement LDP.</p>
Anon 18	<p>The priority given to climate resilience and nature recovery are correct, but would be further strengthened by reference to the need to take full account of the needs of future generations. The expectations, and hence demands, of current generations have been shaped by several centuries of over-reach in our exploitation of our environment. To achieve a climate and ecosystems which support humanity in coming centuries will require precautionary action - including refraining from actions - going beyond mere acknowledgment and wishful thinking.</p>	<p>Comments noted. The Well Being of Future Generations (Wales) Act is a key driver for the Council. Furthermore, the emerging new Plan will be informed by an Integrated Sustainability Appraisal. Therefore, account will be taken of future generations without needing to alter the KIVO. Your comments re: precautionary action/approaches (with the aim of re-dressing imbalance) are appreciated.</p>
Anon 19	<p>The key issues have been captured.</p>	<p>Noted</p>
Anon 20	<p>I think so</p>	<p>Noted</p>
Anon 21	<p>key issues cover most key areas, although this lacks a little clarity and emphasis. For instance, <b>issue 19</b> sets out a</p>	<p>Thank you for your comments. The titles/headings of each Key Issue have been revised in the manner suggested.</p>

	<p>sub-issue well, which other headings could replicate, e.g.</p> <p><b>5.</b> Demographic challenges- an aging population</p> <p><b>3.</b> caring for resources..... this needs to include and emphasise water as this is a prime resource for sustaining life</p> <p><b>4.</b> sustainable transport- connecting people and places</p> <p><b>6</b> and <b>7</b> perhaps link these to emphasise the differences and parallels</p> <p><b>10.</b> Planning for new homes - warm and flexible to meet future needs</p> <p><b>12</b> add reference to supporting and developing local food networks....essential to farm diversification and economic rural recovery</p> <p><b>14.</b> perhaps include sustainable in title...supporting sustainable tourism</p> <p><b>16.</b> possibly rename to emphasise digital futures.</p>	<p>It is not considered necessary to emphasise water as this has a place amongst other essential resources within KI.2 and Objective 3.</p>
<p>Anon 22</p>	<p>In the section: <b>8. Right Development, Right Place</b>, you MUST make allowances for 'development' that is not necessarily a housing development which seems to be the main focus of your new plan and leaves a big hole for situations like the one I am currently living in. You MUST have a section that deals with inappropriate change of use and other types of 'development' that severely impact local residential amenity. More must be written into your plan to protect amenity at all costs. It must be clearly stated so that there is no room for doubt or misconstruing of what is acceptable. Also there MUST be a section that states that</p>	<p>Thank you for your comments. The planning matters raised (such as protecting amenity) are already in the Adopted LDP and will continue to feature in the new Plan – detailed policies will emerge when the new Plan reaches the Deposit stage.</p> <p>The KIVO has been updated now to include reference to neighbouring uses and compatibility.</p> <p>Enforcement is a matter for development management outside of the new plan preparation, whilst permitted development is set out by Welsh Government in Regulation.</p>



	<p>permitted development is not a given, if it would have severe impact on residential amenity. There MUST also be more made of Planning and hours of operation. This seems to be something that does not take place as a matter of course. And sometimes the hours specified are NOT acceptable in a residential environment.</p>	<p>Noise/nuisance issues may be a planning matter in some circumstances (e.g. breach of condition) but are also subject to separate control regimes as an Environmental Health matter. Please take your concerns up with the Development Management team if you have not already done so.</p>
Anon 23	<p>Specifically for Llandrindod, what is going to be done with all the empty buildings that clearly drag on the town's ability to seem attractive to outside investment? They cannot all be made into flats. How about putting some education college/university campus here and make student accommodation? There is a recording studio and plenty of venues- a music festival to accompany and advertise as a place to study? This would also lower the demographic and bring more money and investment.</p>	<p>Comments noted. The Replacement Plan will need to adopt a placemaking approach and include policies that enable the future re-use and development of previously-developed and vacant sites, some of which will help to regenerate towns. Powys County Council has recruited a number of Town Centre Liaison Managers and we suggest you raise your ideas through this channel. The contact for Llandrindod Wells is Richard Morgan (richard.morgan1@powys.gov.uk)</p>
Anon 24	Yes	Noted.
Avison Young (Agent) on behalf of site promoter (14)	<p><b>Key Issue 7 (KI.7): Supporting Healthy Lifestyles</b></p> <p>The wording of this KI relates solely to supporting physical health (i.e. tackling levels of obesity) by considering the location for development and hard active infrastructure. The Council should consider widening its definition of what is defined as 'healthy' to include further subsets of health such as social and mental health, within this KI.</p> <p><b>Key Issue 8 (KI.8): Right Development, Right Place</b></p>	<p>Thank you for your comments. KI.7 has been re-considered and updated.</p> <p>KI.8 comments noted.</p> <p>KI.10 comments noted (there will be an opportunity to comment on candidate sites as part of the Preferred Strategy consultation).</p> <p>KI.14 comments noted. Detailed policies, including for tourism development/loss of tourism assets will emerge when the new Plan reaches the Deposit stage.</p>

	<p>It is acknowledged under KI.8 that the growth and spatial distribution of new development should be founded upon resilient location and design choices. The context identifies Regional Growth Areas within Powys including The Heart of Wales, of which Builth Wells is identified. Our client’s site is located on the edge of Builth Wells and would be a suitable location to provide additional low cost, residential development which will help meet the local needs of the Local Authority.</p> <p><b>Key Issue 10 (KI.10): Planning for New Homes</b></p> <p>This KI is well-aligned with national policy to meet the varying needs of communities. Notably, it identifies Powys’ primarily low-wage economy and the necessity for new homes to serve the growing population, whilst accommodating the trend of reducing average household size. Furthermore, the KI recognises that average house prices in Powys have increased at a higher rate than average incomes, resulting in a need for affordable housing. Thus, there is a need for low-cost, smaller housing units for affordability and spatial purposes. Our client advocates that caravans (and by virtue, caravan sites) constitute a form of low-cost housing, below the standardised market rates for ordinary housing. Therefore, residential caravans are a unique form of affordable, single-storey housing that have the ability to</p>	<p>Officer comment: Whilst this representation includes support for the client’s Candidate Site Submission, it has been largely related to the KIVO framework and hence these comments are considered relevant to the current consultation.</p> <p>Information from the site proposer’s perspective regarding support/justification for it are not being considered as part of this consultation. All candidate sites are being analysed and assessed in accordance with the published Candidate Sites Assessment Methodology to ensure consistency and fairness.</p>
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	<p>address the housing needs of certain groups, and those who might be seeking to downsize. Consequently, planning policies should support the conversion of caravan sites from holiday use to residential use.</p> <p><b>Key Issue 14 (KI.14): Supporting Tourism</b></p> <p>Our client agrees that tourism is an integral and foundational part of the Powys economy, which the planning system should maintain and enhance. Planning policies should reflect this position and encourage further development of tourism sites. Additionally, planning policies should only allow for the loss of tourism uses unless it is proven through an Impact Assessment OR where the development would bring substantial benefits (i.e. housing). It is this latter point that we believe should be utilised to allow for additional residential units to come forward in the Local Plan area.</p>	
<p>Chair - Powys Local Access Forum (Have your Say Survey, respondent 25)</p>	<ol style="list-style-type: none"> <li>1. The key issues and objectives represent a good way forward.</li> <li>2. There are, however, opportunities to make it clearer that the Council is committed to fulfilling its statutory duty to assert and protect the rights of the public to the use and enjoyment of footpaths, bridleways and restricted byways.</li> <li>3. It is also, of course, important to protect the rights of way infrastructure for the children of today in line with the Well Being of</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted</li> <li>2. The KIVO document has been reviewed so that the value and importance of well-maintained p.r.o.w is reflected where possible. More detailed policy will be developed as the Plan progresses.</li> <li>3. Noted and agreed.</li> <li>4. Consideration will be given as to how new development can contribute to the maintenance and management of p.r.o.w.</li> </ol>

	<p>Future Generations (Wales) Act 2015.</p> <p>4. The document should also reflect that the right of way infrastructure has not been adequately maintained over many years and that its parlous condition is adversely affecting the Council’s efforts to improve the health and wellbeing of its residents and encourage tourism.</p> <p>Suggested changes to reflect these general points are set out below:</p> <p><b>Key Issue 3 – caring for resources</b>          1.3.13 - Rights of way are mentioned in the section on historic and built environment resources. Common land is mentioned in the section on the natural environment resources. Both these references are welcomed. The one relating to common land refers to “safeguarding”; could this be applied to rights of way as well please?</p> <p><b>Key Issue 4 – promoting sustainable transport</b>          1.3.16 –This section would be enhanced by reference to the importance of walking and cycling in promoting sustainable transport especially bearing in mind that they are identified in the revised Highway Code as top of the hierarchy of road users.</p> <p><b>Key Issue 6 –planning for wellbeing</b>          1.3.22 – This section refers to safeguarding green spaces. Could common land and rights of way also be added please?</p>	<p>Wording changes have been incorporated into the KI. text taking account of the suggestions made.</p>
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	<p><b>Key Issue 14 – supporting tourism</b></p> <p>1.3.46 – Reference is made to the potential for sustainable tourism development but it should be acknowledged please that the parlous state of the right of way infrastructure is having an adverse effect on tourism development and significant efforts are needed to address this.</p>	
<p>Caersws Community Council (Have your Say Survey, respondent 26)</p>	<p>No.</p> <p>1. Caersws CC feel that there is a Key Issue missing which is the development and improvement of communication across all tiers of local Government, from Welsh Government through the County Council and down to Town and Community Councils.</p> <p>2. Caersws CC would also like more consideration given to the Local Transport Network. As well as the above Caersws CC feels that the below points are missing from the Key Issues detailed;</p> <p>3. <b>1.3.3:</b> There is insufficient emphasis on the importance of the maintenance and management of existing storm water drainage in relation to flood alleviation. (KI.1)</p> <p>4. <b>1.3.19:</b> There is not enough information regarding provision for the elderly, how will provision for the elderly be added into the LDP and enforced? (KI.5)</p> <p>5. <b>1.3.34:</b> There is an increased need for affordable housing which is not currently being met. What changes will be put in place to ensure demand is met? (KI.10)</p> <p>6. <b>1.3.40:</b> Much of the</p>	<ol style="list-style-type: none"> <li>1. Your concerns are noted. The cascade of information/communication is considered a wider matter.</li> <li>2. Noted. Transport is an integral matter to the Replacement LDP and a fundamental placemaking principle that is being considered throughout. The wording of KI.4 has been updated. The Plan will be accompanied by more detail on Transport/Infrastructure evidence.</li> <li>3. Comments noted. Land Drainage and Flood matters are in the Adopted LDP and will continue to be considered in the preparation of the new Plan. Powys County Council is the SuDS Approval Body. KI.1 has been updated.</li> <li>4. Comments noted. Objective 12 (housing needs) and KI.10 have been updated. Also note that new policies on this will be developed further as the Plan progresses.</li> <li>5. Noted. Affordable Housing policies will be developed further as the Plan progresses. A key piece of evidence in formulating the new Plan is the Local Housing Market Assessment.</li> <li>6. Comments noted. KI. 12 has been updated regarding agricultural diversification.</li> </ol>

	<p>agricultural land in Powys is hill land suited only to livestock production. In these areas diversification is generally restricted to tourism or renewable energy. This should receive more emphasis in the LDP (KI.12)</p> <p>7. <b>1.3.52:</b> Storm water drainage should have the same level of importance as foul water (sewage) and other utilities in LDP considerations. (KI.16)</p> <p>8. <b>1.3.58:</b> Renewable energy generation primarily focusses on electricity generation from wind, solar and hydro. Throughout Powys these developments are constrained by a lack of local grid capacity for generation connections which currently results in small Developers being unable to proceed and large Developers building their own networks for connection to the National Grid with no benefit to local communities which is in contravention of Welsh Government Policy. The LDP must reflect this in Planning Policy. (KI.19)</p>	<p>7. Comments noted. Wording changes have been made to KI.16.</p> <p>8. Comments noted. It is agreed that reference should be made to grid infrastructure and capacity, changes will be considered to ensure alignment with Future Wales/Planning Policy Wales. KI.19 and Objectives 20 and 21 have been revised.</p>
<p>Anon 27</p>	<p>The key issues stated are an improvement over the original but will they be adhered to and community involvement should also become a priority, including advice taken from the local community Councils</p>	<p>Comments noted. The Council agrees that community involvement is essential and will follow the agreed Community Involvement Scheme. This process includes discussion with Town and Community Councils who are important stakeholders throughout plan preparation.</p>
<p>The Leith Group representing EPC-UK (1) (re: site at Ystradgynlais )</p>	<p>1. In preparing this submission we have had regard to the list of key issues identified by the local authority to date and agree with the list as drafted.</p>	<p>1. Noted.</p> <p>2. i) Comments noted, supporting existing businesses is a matter in the Adopted LDP and will continue to be considered in the preparing the new Plan. The Council has revised KI.11.</p>

	<p>2. We would however recommend the addition of the following matters:</p> <p>i) Supporting existing businesses within the Plan area to expand, and to secure development in locations which do not undermine their future operations. This could be added to the Issue titled 'Planning for a Vibrant Economy' which currently appears to be unduly weighted on the creation of new businesses and jobs, at the expense of existing operators and employers; and</p> <p>ii) Delivering new development in locations and on sites which do not result in an increased risk to community safety from hazard sites. This could well be added to the section on 'Right Development, Right Place', but needs to be included somewhere as reference to hazard sites and community safety does appear to be somewhat lacking from the current draft document.</p>	<p>ii) Comments noted. Detailed policies, including consideration of safety, hazard sites and ensuring neighbourly uses, and safeguarding existing uses, will emerge at later stages. KI.8 has been updated to make more reference to safety/amenity/neighbour considerations.</p>
<p>CarneySweeney on behalf of Bute Energy (2)</p>	<p>The 20 key issues identified are considered to cover all aspects required although it is noted that many are interrelated and could perhaps be condensed together to avoid any unnecessary duplication or inconsistencies e.g. Responding to Climate Change and Supporting Sustainable Energy.</p> <p>At this early stage of the plan making process, it is imperative that each of the key issues are explored in further detail with key stakeholders to</p>	<p>Thank you for the comments. The Council have had to summarise the Key Issues within the consultation document but in research and background work, issues have been further explored. Future stakeholder working will enable discussions on detailed policies as they are being drawn up in the emerging Plan.</p> <p>KI.1 and KI.19 have been revised alongside Objectives 1, 19-21.</p>

	<p>ensure all relevant legislation, targets, constraints and opportunities are taken into account as the Replacement LDP policies on each key issue are progressed.</p> <p>Bute Energy has particular interest in the following key issues and would welcome further dialogue with the Council in exploring these in further detail:</p> <p><b>Key Issue 1 (KI.1): Responding to Climate Change</b></p> <p><b>Key Issue 2 (KI.2): Supporting Nature Recovery</b></p> <p><b>Key Issue 3 (KI.3): Caring for Resources</b></p> <p><b>Key Issue 8 (KI.8): Right Development, Right Place</b></p> <p><b>Key Issue 19 (KI.19): Supporting Sustainable Energy: Harnessing Green Power and Promoting Energy Efficiency.</b></p> <p>Bute Energy is an independent renewable energy company combining experience with innovation and is currently working on a number of projects within Powys. As a company Bute Energy is making the Welsh weather work for Wales, developing onshore wind, solar and energy storage projects and associated grid connections. These projects will generate and distribute clean, green energy, supporting the Welsh Government’s target for electricity to be 100% renewable by 2035 in addition to helping to achieve the Welsh and UK Government’s</p>	
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	<p>declared climate emergency, renewable energy consumption and Net Zero targets for 2030, 2035 and 2050.</p> <p>It is however noted that the key issues <b>KI.1</b> and <b>KI.19</b> do not include reference to the Welsh Government’s target (announced in January 2023) for electricity to be 100% renewable by 2035. Key Issues should be explored in greater depth to ensure that subsequent LDP policies are developed in accordance with all relevant legislation and national targets.</p>	
<p>CPAT – Clwyd-Powys Archaeological Trust (3)</p>	<p>We welcome the fact that the historic environment has been identified as a key issue within <b>Key Issue 3 (KI.3): Caring for Resources</b>. The historic environment has numerous pressures with the dominant impact being new development. Other pressures include the effects of climate change such as increased coastal and riverine erosion and the loss of important paleoenvironmental and artefact preservation in peat or other waterlogged deposits due to water table changes in a warming climate. Agricultural impacts can include continuous ploughing of earthworks, permitted developments for new agricultural buildings, access tracks and upland or marginal land improvement for the creation of new arable or pasture fields. Commercial forestry and woodland creation opportunities can impact heritage through new planting and tree felling. Heritage</p>	<p>Support for this Key Issue noted. Wording additions have been made.</p>

	<p>Crime is also on the increase with structures damaged or defaced.</p>	
<p>Natural England (4)</p>	<p>Neighbouring authorities and LPAs have a statutory duty to cooperate with each other and other bodies (including NE), when preparing policies covering strategic issues that require a more joined-up approach. Cross boundary working on collective land use plans / projections likely to have an adverse effect on integrity should consider environmental issues such as air and water quality, species and habitats, soils, and recreational pressures.</p> <p>We advise that the following additional cross boundary issues should be included in the Powys Replacement LDP (2022-2037) :</p> <p><b>Air quality - Impacts on designated sites</b></p> <p>The Plan should address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.</p> <p>Natural England advises that all potential pollutants need to be considered but some could be screened out if sites are not vulnerable or there is little to no chance the emissions from</p>	<p>Thank you, comments noted.</p> <p>Some of the areas mentioned will be dealt with later in the Plan process as more detailed policies develop.</p> <p>The Plan's ISA (including HRA) will also be influential in ensuring that important impacts are not overlooked. Your comments will be shared with the ISA consultants for the RLDP (WSP).</p> <p>Thank you for drawing our attention to a number of issues, including on air and water quality, which are cross-boundary.</p>

	<p>a development will come forward. One of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation which can be damaging to the natural environment. Other issues to consider (but not limited to) are ammonia from mainly agriculture developments and also traffic generation and acid deposition mainly from power generation and traffic.</p> <p>NE has published guidance to help competent authorities to address the assessment of aerial emissions from road traffic and effects on designated sites. While primarily focused on European Sites the principles expressed in the guidance also apply to nationally designated sites (SSSI).</p> <p><b>Water Quality – Impacts on designated sites</b></p> <p>The plan should consider existing and proposed discharges into river catchments on a cumulative cross boundary basis.</p> <p>Powys County Council will need to consider the impacts of the plan on water quality in the River Wye SAC. An evidence base should be developed in order to determine whether there are impacts and to inform site allocations and plan policy. As a part of this we would advise liaison with Welsh Water and with other Local Planning</p>	
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	Authorities discharging into the Wye catchment.	
Historic England (5)	We have no specific comments to raise, at this time. We would request that the Council considers if there are any cross-boundary issues with authorities in England, specifically Herefordshire and Shropshire, and how this may need to be taken forward within the Local Plan.	Comments noted.
B Dennison (6)	<p>1. I fully support <b>1.3.59</b> at the top of page 13. However, the wording of Objective 12 (Housing Needs) at the top of page 18 is weak in comparison and makes no reference to energy efficiency or minimising energy requirements. The wording of Objective 12 as it stands simply ‘locks in’ the status quo for future generations. It is therefore unlikely to drive the desperately needed improvements - recognised elsewhere in the KIVO document - in terms of energy efficiency and energy minimisation in future new homes. Objective 12 includes the term “high quality new homes”; and in my view there is a serious risk of losing sight of the fact that energy efficiency is best thought of in terms of high levels of insulation, airtightness and ventilation, across the full range of new homes. This needs to be better reflected in Objective 12 and also in Key Issue 10 which should overtly and inextricably link ‘Planning for New Homes’</p>	<p>Comments noted. The detail on design standards will be considered in the later stages of preparing of the Plan.</p> <p>However, the Council has reviewed the KIVO and made changes in response to your suggestions.</p>

	<p>with 'Energy Efficiency and Minimisation'.</p>	
<p>Cyfoeth Naturiol Cymru/Natural Resources Wales (7)</p>	<ol style="list-style-type: none"> <li>1. Change: 1.3.15 ... statutory purposes of adjoining National Parks and <b>National Landscapes</b> designated for special qualities including of landscape and scenery.</li> <li>2. Change: 1.3.15 We would recommend adding damage and loss to peatland. We would refer you to The National Peatland Action Programme priorities</li> <li>3. 1.3.22 We welcome the inclusion and safeguarding of green spaces. We refer you to the standards for provision of accessible natural green spaces in the Greenspace Toolkit as advocated in TAN16. Recommend: We recommend that Powys commits to assessing all settlements using this toolkit and providing or upgrading spaces to meet the standards in the toolkit.</li> <li>4. 1.3.24 We also advise that improvements to Public Rights of Way as prioritised in the Powys Rights of Way Improvement Plan (RoWIP) could provide vital opportunities for healthy outdoor exercise.</li> <li>5. 1.3.46 We also advise that improvements to Public Rights of Way as prioritised in the Powys Rights of Way Improvement Plan (RoWIP) could be an important contributor to the tourism offer.</li> <li>6. 1.3.49 We welcome your Authority's commitment to sustainable placemaking. We</li> </ol>	<p>Thank you for your detailed response including evidence sources and suggested wording changes.</p> <p>The Council has reviewed the proposed amendments and made changes where considered necessary. Some matters will be addressed by more detailed Plan policies at the Deposit Stage.</p> <p>For information, we envisage that the Plan will be supported by an Open Space Assessment (to include accessible natural green spaces) so the Toolkit is not being mentioned specifically.</p> <p>The KIVO has been reviewed to make more mention of public rights of way and their improvement.</p>

	<p>would like to point out the dangers posed by climate change induced summer heatwaves and the need to plant street trees for shade to counter this threat. We refer you to the Scale-dependent interactions between tree canopy cover and impervious surfaces reduce daytime urban heat during summer by Carly D. Ziter, Eric J. Pedersen, Christopher J. Kucharik, and Monica G. Turner, PNAS. April 9, 2019 vol. 116 no. 15 pp 7575–7580). We therefore recommend that at least 20% tree canopy cover should be the target for all major settlements and 40% tree canopy cover in shopping and residential streets.</p> <p>7. 1.3.52 We welcome your acknowledgement of these problems. We advise that SUDS retrofit schemes can help reduce the issue of capacity in mains sewers and should be encouraged whenever appropriate /feasible.</p> <p>8. 1.3.58 We welcome your commitment to renewable energy generation and we would stress the importance of allowing the right development in the right place. We recommend priority should be given to renewable energy generation projects that minimise impacts on sensitive habitats and wildlife.</p>	
<p>Glandwr Cymru/Canal &amp; River Trust in Wales (8)</p>	<p>Our waterways should be acknowledged within the policy document, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health</p>	<p>Thank you, comments noted. The KIVO document has been reviewed so that the importance of canals and waterways is better reflected. Note that the definition of green infrastructure can include blue (if the Council takes this approach in the RLDP, it will be</p>

	<p>service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource, a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the plan area.</p> <p><b>Key Issue 2 – Nature Recovery</b></p> <p>The Montgomery canal is a designated Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) in recognition of the protected populations of floating water plantain that it supports. The canal corridor within Powys contributes to the blue/green infrastructure within the area. We consider that the canal should be included within the policy and the role it has to play.</p> <p><b>Key Issue 3 – Caring for Resources</b></p> <p>We welcome the reference to canals, under transport infrastructure as a historic and built environment resource and that this forms part of the active travel route/network. Of course, the canal corridor also contains numerous historic and designated assets such as bridges and locks. The canal itself is also a 200 year heritage asset, which is not built to modern engineering standards and needs to be protected and safeguarded</p>	<p>detailed in a Glossary to avoid confusion).</p> <p>Some of the matters you raise will be the subject of later detailed policies as the Plan reaches the Deposit stage.</p> <p>We anticipate the Replacement Plan will refer to Strategic Resources/Assets (rather than material assets) in policy wording. However, the KIVO structure will retain the main heading of natural, historic and built environment resources.</p> <p>KI. 3 and Objective 3 have been reworded to capture more detail.</p> <p>As with the Adopted LDP, it is likely that a bespoke policy will be required to address the multi-functional nature of the Montgomery Canal to both protect it and support its future. This would be a policy later in the Deposit Plan.</p>
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	<p>from inappropriate development.</p> <p>The previous consultation also considered ‘Material Assets’ as part of the key issues and options. It is unclear if that now falls under this key issue instead.</p> <p>It is unclear if this issue should also include reference to the ongoing restoration of the Montgomery Canal. The Trust supports proposals which secures restoration, preserve and enhances the Montgomery Canal as a multifunctional resource and opposes proposals that would adversely affect the canal’s scientific and conservation designations or prejudice its sensitive restoration. It should be noted that the restoration of the Montgomery Canal relates to the full length of the waterway in England and Wales, to provide a connection to the Llangollen Canal and the wider inland waterway network. We consider the potential restoration of the Montgomery Canal should be included for within the plan.</p> <p><b>Key Issue 4 – Promoting Sustainable Transport</b></p> <p>The canal corridor has a role to play in providing a safe, non-trafficked, free to access sustainable transport route where it passes through local communities. It is however important that the canal towpath is fit for purpose to accommodate such access and use. Therefore, approaches towards the promotion of walking and cycling, including the formation</p>	
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	<p>of strategic policy, could consider the value of our towpath network, which can provide safe, traffic-free routes for people to travel and exercise. Investment into resurfacing the canal towpath to provide a durable year-round surface may be required to maximise its use.</p> <p><b>Key Issue 6 – Planning for Wellbeing and 7 – Supporting Healthy Lifestyles</b></p> <p>The canal corridor and providing access to this has a role to play in promoting health and wellbeing of local communities. Our waterways can provide areas for social interaction and can enable and support healthy lifestyles through providing access for walking, cycling and waterborne sports. They also provide direct public access to green and blue infrastructure networks. Waterways have a significant role to play in promoting health and social inclusion, particularly in tackling physical inactivity, obesity and in reducing stress. This is especially true for the many disadvantaged communities who have waterways on their doorstep. Our waterways provide tranquil spaces, which can also provide areas for personal reflection and stress relief. We would welcome recognition of the role the Montgomery Canal plays in this regard promoting health and wellbeing.</p> <p><b>Key Issue 14 – Supporting Tourism</b></p>	
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	<p>The canal corridor has a role to play in supporting tourism within Powys in terms of the scenery, cultural and heritage offer of the canal and recreational opportunities, both on and off the water. This helps to support the local economy. We would welcome recognition of the role the Montgomery Canal plays in this regard towards supporting tourism.</p>	
<p>Network Rail (9)</p>	<p><b>1. Key Issue 4: Promoting Sustainable Transport</b></p> <p>Network Rail support the promotion of sustainable transport methods within Powys. Where new development is located and designed to promote active travel routes, the use of a public right of way over level crossings should be considered in terms of railway safety.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of level crossings. The safety of the operational railway and of those crossing it is of the</p>	<p>Thank you for your comments.</p> <p>It is appreciated that National Rail are an important statutory consultee in the planning application process and that safety at level crossings is a material consideration.</p> <p>In preparing the development plan, when the Council is assessing sites for potential land allocation (following the agreed Candidate Sites Assessment Methodology), there will be an opportunity for main stakeholders to make comments before sites are included in the Deposit Plan. The Council will contact main stakeholders to this effect.</p> <p>General/public comments on site suitability can also be submitted earlier, at the Preferred Strategy stage (Pre-deposit Plan), when the Candidate Sites Register is first made public.</p> <p>In response to your feedback wording changes have been made at KI.4, KI.8 (safety) and KI.13.</p>

	<p>highest importance to Network Rail.</p> <p>Level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing</li> <li>• By any development or enhancement of the public rights of way</li> </ul> <p>Network Rail would therefore welcome early engagement on development sites that are</p>	
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	<p>within walking distance of a level crossing so appropriate mitigation can be sought. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements at level crossings.</p> <p><b>2. Key Issue 13: Supporting the Mid Wales Growth Deal (MWGD)</b></p> <p>The MWGD looks to achieve strategic rail corridor improvements such as line speed enhancements on the Cambrian Line as well as encouraging lightweight freight on passenger trains. Objectives also include the development of strategic hub interchanges at key rail stations. The plan also looks to support decarbonisation, supporting the model shift to public transport.</p> <p>Network Rail would recommend the role of rail is amplified within the local plan to reflect particularly the opportunities for this mode to help support environmental objectives. This is most relevant for supporting freight use in order to meet decarbonisation targets as well as encouraging forms of active travel.</p> <p>Where development proposals may impact on a station it may be reasonable to</p>	
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	request developer contributions towards station improvements that allow for things such as increased station parking, pick up/ drop off points, improved bus routes etc that will improve access to the rail network for residents.	
Anon 5	<p><b>Key Issue 2</b> - development schemes could be used as a tool to encourage and increase more biodiversity beyond what is currently accepted.</p> <p><b>Key Issue 10</b> - reduce the criteria for affordable housing and provide more flexibility for obtaining agricultural workers dwellings which could help with housing stock.</p> <p><b>Key Issue 19</b> - Large Sustainable energy schemes should be encourage/forced to support the local economy/area. Power generated in Powys for Powys</p>	Comments noted, thank you. However, the suggestions relate mainly to detailed policy approaches which the Council will be developing later in the Plan process.
Newtown & Llanllwchaian Town Council (10)	<p>1. In accordance with the evolving landscape of our community, the consideration of Education/Schools as an independent Key Issue is recommended. Given the need for additional housing and employment opportunities, a dedicated focus on schools becomes imperative. The threat of closure or merging of numerous schools underscores the necessity for a thorough examination of the long-term objectives for education within the county. Furthermore, particular attention to the long-term goals for Welsh language schools is warranted, aligning with the Welsh Government's</p>	<p>Points 1. To 3. Thank you for these comments. Whilst the Council has not added extra stand-alone issues to the KIVO, wording changes have been made.</p> <p>4. As a holistic approach, placemaking serves to create “sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly.” Equalities Assessment will further help to ensure that the Plan is responding appropriately to Equality &amp; Diversity issues.</p>

	<p>ambitious target of surpassing one million Welsh speakers by 2050. A comprehensive elucidation of how these objectives will influence the educational landscape in the county over the long term is essential.</p> <p>2. Likewise, the inclusion of Emergency/Urgent Healthcare as a distinct Key Issue is suggested for strategic planning. The objectives should encompass an evaluation of A&amp;E provisions, ambulance, air ambulance services, and collaborative relationships with neighbouring counties. Given the anticipated population growth, driven by the imperative for new housing, the demand for improved healthcare provisions, whether in the form of general practitioners or emergency treatment facilities, is likely to escalate. Recognising the potential significant population increase until 2037, a more detailed examination of healthcare in Objective 19 is proposed to ensure the adequacy of healthcare services in the face of expanding demographics.</p> <p>3. Moreover, the integral role of Arts/Culture should be duly acknowledged within the framework of the Local Development Plan. Preserving our cultural heritage and fostering artistic and cultural endeavours are</p>	
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	<p>fundamental to the identity and vibrancy of our community. A holistic strategy embracing both the safeguarding of cultural history and the promotion of ongoing artistic and cultural activities is imperative for sustainable community development.</p> <p>4. The concept of Diversity/Inclusion should be integral to our strategic planning considerations. Addressing diversity in age, gender, race, ethnicity, religion, and disability is paramount. Notably, as Powys has provided refuge to those fleeing conflict, it is essential to formulate a long-term plan that ensures increased opportunities for diverse populations within our county. This encompasses inclusive spatial planning, exemplified by public facilities like washrooms,</p> <p>designed with a commitment to accommodating all genders. Through these measures, we aim to foster an inclusive and welcoming environment reflective of the diverse tapestry of our community.</p>	
<p>Llandrinio &amp; Arddleen Community Council (11)</p>	<p>The Community Council would like to see a greater emphasis on building sustainable buildings, having smaller sites (particularly in Rural communities) and also to provide Employment sites in Large Villages.</p>	<p>Thank you for your comments. You will note that your support for more emphasis on building sustainable buildings is mirrored by other representations. Wording changes have been made in KI.10 and KI.11. The finer detail of design standards will be considered in the later stages of preparing of the Plan.</p> <p>Regarding potential sites, comments noted. Please review the Preferred Strategy when it is published. You will be able to see where settlements sit in</p>

		<p>the proposed Sustainable Settlement Hierarchy and the framework being taken towards development in these and the more rural communities/locations. You can also make comments on the candidate sites contained in the register (being published with the Preferred Strategy). Detailed site allocations will not be made until the Deposit Plan. The Preferred Strategy is a key stage at which comments should be made in order to influence the content of the Deposit RLDP.</p>
Llandysilio Community Council (12)	<p>Councillors would also like to see a variety of housing including single bedroom properties for those downsizing or just starting on the housing ladder and also sheltered accommodation for those with extra needs.</p>	<p>Thank you, comments noted.</p> <p>Policies concerning the size and mix/variety of new homes required on sites and policies for meeting specialist needs will be developed further as the Plan progresses. A key piece of evidence in formulating the new Plan is the Local Housing Market Assessment which helps to ascertain the levels of need, location of need and the types of homes required. Other evidence will also be assessed. Objective 12 has been reworded.</p>

**Question 2 – Do you have any comments to make on the Vision?**

Representor	Representation	Council Response
CarneySweeney on behalf of Bute Energy (2)	<p>It is considered that the Vision could be more ambitious in respect of responding to climate change and harnessing green power. Given Powys’ key role in this, recognised in Future Wales with the identification of Pre-Assessed Areas, we believe the specific reference to wind energy development should be part of the Replacement LDP’s vision.</p>	<p>Over-arching Response:</p> <p>Thank you for the various constructive comments made on the Draft Vision.</p>
PCC Countryside Access and Recreation (13)	<p>We are pleased to see reference to the importance of greenspace and outdoor recreation, including the public rights of way network. However, we would comment that there is no specific mention of outdoor play provision and access to greenspace for children and</p>	<p>The Council will carefully consider the points raised</p>



	<p>young people. This is really important for the wellbeing of the county’s children and young people, so we would like to see it referenced as part of the vision and objectives.</p>	<p>within the Representations and a revised Vision will be included in the Preferred Strategy (and open to further consultation at that stage).</p> <p>Some issues raised here are not within the scope of development plan preparation. For example, the new plan does not include enforcement which is a development management issue – general comments re: enforcement concerns will be passed on to the development management team leader for information.</p>
CPAT (3)	<p>The Vision is bold and we are pleased to see that protecting and caring for the historic environment forms part of that vision.</p>	
Chair - Powys Local Access Forum (Have your Say Survey, respondent 25)	<p>Can the vision make reference please to the importance of improving access to the countryside to (i) enable residents to live healthier lives and (ii) encourage tourism?</p>	
The Leith Group representing EPC-UK (1)	<p>Representations are being made on the consultation document, as EPC-UK operate a site known as Norton’s Yard for the storage of hazardous materials within the area under the plans effect.</p> <p>We would advise that we have no objection to the Vision as drafted, however in our view, the draft remains lacking in its focus and support on protecting and promoting existing businesses and employers within the authority area. The Vision once again focuses on the creation of new jobs and operations, when existing businesses already offer a vital resource to the local economy, and the emerging Draft Plan should ensure that their future needs and ability to expand, develop and deliver jobs and investments are also recognised, and not hindered by emerging planning policy.</p> <p>It is further noted that the need to secure employer and community safety, particularly in relation to hazard sites, is also absent from within the vision, and we would therefore request that the draft Vision be reviewed in light of the comments laid out above to ensure it remains fit for purpose.</p>	
Anon 2	<p>An excessive focus on the 'climate emergency' which is a political ideology not a scientific or planning issue.</p>	
Anon 3	<p>1. I see lack of affordable housing, and of progress towards providing the same, as critical.</p> <p>2. I see climate change as real but likely to be relatively favourable to this part of the world, especially if we fully embrace a move to green energy, including facilitating approval of wind farms and changes to the national grid.</p>	

<p>Anon 4</p>	<p>Climate change - a grand set of words that will impoverish the people that can least afford it. Supporting the Welsh Language commendable but a total waste of tax payers money.</p>	
<p>Anon 6</p>	<p>My comments in the Vision is it is too idealistic....and can only ever begin to be achieved with a massive pot of money from somewhere ...not from increased local taxes etc. : we pay enough of those already .Local facilities such as drain and ditch clearing and road sweeping which help to reduce flooding were a regular occurrence 20 years ago in mid Wales .....now they appear as crisis management only.</p>	
<p>Anon 7</p>	<p>The Vision states that, "The wealth of resources within the natural, built and historic environments, including iconic landscapes, will be safeguarded and valued.", which suggests that resources will be protected, but not look to be enhanced. This is in contrast to what is discussed in the Key Issues section, namely section 1.3.15, where it is stated that, "Planning Policy Wales (Chapter 6, updated in October 2023) cites the need to protect and enhance the natural and historic environment as well as other components of the natural world, such as water resources or air quality. The planning system therefore must look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of the natural, historic, and built environments."</p> <p>The Vision states that "All communities will have developed in a way which enable and support:...The transition towards net zero.". Using the term 'transition' would suggest that by 2037 (the end of the plan period), Powys would not yet be Carbon Net Zero, which is in contrast to 1.3.4 where it is stated that "The Council shares the ambition of the Welsh public sector to reduce its carbon emissions to net zero by 2030.". If the Vision actually refers to the Welsh Government's commitment to reach Net Zero by 2050 then this should be made more clear in the Vision statement.</p>	
<p>Anon 10</p>	<p>The vision sounds great but Powys CC should be at the forefront of controlling developers and ensuring that developments are for the community's benefit NOT the developers pockets.</p>	

Anon 11	Ambitious and positive if you live in a Regional Growth Area, but possible concerns over what the ambitions are for areas outside these.	
Anon 13	Find alternative site, consider the flooding, look, infrastructure of the town, do we need more houses in Montgomery. <b>Council Response:</b> Please note that this comment does not relate to the current consultation document.	
Anon 14	Not fair consideration in the first place when the town council meeting took place, unfair discussion and consultation with all residents. <b>Council Response:</b> Please note that this comment does not relate to the current consultation document.	
Anon 17	<p>What is the definition of affordable housing?</p> <p><b>Council Response:</b> This is set out in national planning Technical Advice Note.2 and in the Council’s existing Supplementary Planning Guidance on Affordable Housing:</p> <p>“Housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers”</p> <p>Increasing the number of houses, hence vehicle users ,increases the pressure on available parking spaces in the town. There is no properly identified disabled parking space in Montgomery. Tourism will not be supported if we allow licensed premises to be converted to other uses, for the benefit of the owner not the community.</p> <p><b>Council Response:</b> We recommend you get involved in the Montgomery Place Plan to deal with locally specific issues. We would urge you to raise local issues with the Town Centre Liaison Officer, Phil Jones, who works for Powys County Council: <a href="mailto:philip.jones1@powys.gov.uk">philip.jones1@powys.gov.uk</a></p>	
Anon 18	The Vision, rightly, proposes that the County's wealth of resources including its landscapes are sustainably managed, safeguarded and valued. However many of the County's ecosystems including its uplands and rivers are at present severely degraded and therefore not meeting their potential as to climate resilience. The Vision should therefore also propose restoration of ecosystems and habitats, not merely safeguarding them in their current condition.	

Anon 19	The vision is very lofty with no plans on how to achieve the objectives.	
Anon 21	<p>I want to see a vision that is much clearer and more descriptive about a future that I foresee for Powys. My vision is:</p> <p>“A Plan that leaves a secure and safe legacy to hand onto future generations. Strong, sustainable rural communities and prosperous towns and villages will have adapted and grown in a way which enables farming and nature to flourish, addresses clean energy demands and turns the tide on high carbon dependency. Residents will have the space to enjoy a safer, healthier, greener and better-connected Powys; where people are benefitting from locally sourced food and drink networks, improved physical and digital infrastructure and living in a county where stronger job prospects, especially for our young people, are aligned with increased skills and innovation. Communities will have developed to look after all ages. Market towns will be champions for their local distinctiveness, character, and culture, providing much-improved choice and access to high quality low-impact housing in locations where people wish to live”.</p>	
Anon 22	None other than PLEASE make it more inclusive of situations other the usual type of planning issue.	
Anon 23	Lack of vision for 'people'. Plenty on nature which is important, but what about jobs? Private investment? Regeneration? Vibrancy?	
Anon 24	fine in theory! Practice is the key	
Caersws Community Council ((Have your Say Survey, respondent 26)	What metrics and timescale will be used to measure the delivery of the LDP against the published vision. <b>Council Response:</b> The Replacement Plan will be monitored (as happens with the Adopted Plan) through a Monitoring Framework which tests how well the Plan is meetings its Objectives. The Framework will be developed later in the Replacement Plan process. The Adopted Plan is supported by an Annual Monitoring Report which can be viewed on the Council’s website and a similar approach will be needed for the RLDP.	
Anon 27	Ideas good but will they happen in reality.	

<p>The Leith Group (1)</p>	<p>Once again we would advise that we have no objection to the Vision as drafted, however in our view, the draft remains lacking in its focus and support on protecting and promoting existing businesses and employers within the authority area. The Vision once again focuses on the creation of new jobs and operations, when existing businesses already offer a vital resource to the local economy, and the emerging Draft Plan should ensure that their future needs and ability to expand, develop and deliver jobs and investments are also recognised, and not hindered by emerging planning policy.</p> <p>It is further noted that the need to secure employer and community safety, particularly in relation to hazard sites, is also absent from within the vision, and we would therefore request that the draft Vision be reviewed in light of the comments laid out above to ensure it remains fit for purpose.</p>	
<p>Natural England (4)</p>	<p>Natural England advises that the Plan’s vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity and considering opportunities to enhance and improve connectivity.</p> <p>Where relevant there should be linkages with cross boundary partnerships and strategies to inform the plans relating to the Natural Environment. For example, including and not limited to river catchment partnerships, national park and national landscape partnerships, landscape character studies, water cycle strategies, green infrastructure baseline report, and background papers, for example on biodiversity.</p>	
<p>Avison Young (Agent) on behalf of site promoter (14)</p>	<p>Despite the National recognition of the importance of tourism, alongside the Council’s identification of tourism as a key industry within its administrative boundaries and wider region of mid-Wales, tourism and its substantial value to the locality is not mentioned within the Vision. Therefore, it is strongly advocated that tourism</p>	

	<p>should feature prominently in the opening paragraph of the Vision.</p>	
<p>Newtown &amp; Llanllwchaiarn Town Council (10)</p>	<p>More detail on the concept of 'job prospects based on innovation' would be appreciated, accompanied by a detailed explanation of the underlying principles shaping this phrase and the tangible implications it holds.</p> <p><b>Council Response:</b> To assist in reply, may we reference the Growing Mid Wales Ambition, which defines the characteristics stating:</p> <p><b>ENTERPRISING</b> - Open for business, new and old. A place to start and grow enterprise to enhance regional productivity with a good quality of life.</p> <p><b>SKILLED</b> - A skilled and flexible labour market supported by academic and vocational learning that responds to industry demands that reverses current population trends.</p> <p><b>INNOVATIVE</b> - A test bed for innovation, developing new products and processes capitalising on existing research and industry strengths and creating new/strengthening existing industrial clusters.</p> <p><b>CONNECTED</b> - A fully connected region, unlocking its economic potential driving business growth and innovation and improving social and labour mobility.</p> <p><b>PRODUCTIVE</b> - A strong, productive economy providing the right conditions for business to generate better quality, higher paid jobs alongside better employment opportunity.</p> <p><b>PROSPEROUS</b> - A regional economy that is rooted in fairness and equality of opportunity with accessible training and employment pathways.</p> <p>In assessing the Local Development Plan draft, it is imperative to discern its unique characteristics with regard to practical implementation, setting it apart from LDPs in other counties. This inquiry extends to an exploration of the distinctive elements that make Powys an attractive choice for companies, surpassing alternative locations within Wales and the broader UK. Understanding the specific measures undertaken in Powys that differentiate it as a prime investment destination will provide valuable insights into our regional competitive edge.</p>	

	<p><b>Council Response:</b> Noted, thank you.</p> <p>A critical evaluation of the realism in this vision is recommended, acknowledging its ambitious nature. Furthermore, an analysis of the vision's priorities and potential adjustments in the face of continued financial challenges is essential. Identifying the strategic elements stated for prioritisation and those subject to potential suspension during periods of financial constraints will contribute to a better understanding of the LDP's resilience and adaptability.</p> <p><b>Council Response:</b> This comment is valid but it appears very focussed on Powys Council (or public sector) with regard to financial challenges. The development plan needs to be considerate of the Council priorities/challenges alongside the market requirements to ensure it adequately addresses issues of relevance to the private sector and wider development industry, important stakeholders in meeting vision/goals.</p>	
<p>Llandysilio Community Council (12)</p>	<p>The Community Council wishes to emphasise how important Planning Enforcement is and that without it, it is a complete waste of time to have a Vision statement at all. We have several planning applications that have had conditions imposed to which the developer has not yet adhered. These planning conditions should all be complied with as they were imposed for a specific purpose in line with the current LDP.</p> <p><b>Council Response:</b> It is unfortunate that there can be problems with the planning system at times, including inconsiderate developers. We appreciate this can lead to concern and frustration. Enforcement matters should be raised with development management so that the issues can be investigated.</p>	

**Question 3 – Do you have any comments to make on the Objectives?**

	<b>Representation</b>	<b>Council Response</b>
<p>Anon 2</p>	<p>An excessive focus on the 'climate emergency' which is a political ideology not a scientific or planning issue.</p>	<p>Noted, Council responded in K.I. section, Question 1 above.</p>
<p>Anon 3</p>	<p>They are not objectives unless they are SMART - specific, measurable, achievable, realistic, timebound. There is always the leaning in a public sector organisation to</p>	<p>The RLDP will be subject to a monitoring framework (see Adopted Plan Annual</p>

	prefer woolly words but these do not drive change. What can be measured gets managed.	Monitoring Report for example) which will assess how the Plan is being implemented and if Objectives (with associated measurable Targets) are being achieved. The detail of monitoring comes later.
Anon 4	Make house building easier - presumed consent rather than objecting to everything meaningful. Encourage self building , which based on my personal experience is bottom of the list of priorities for the planning department. Let people build without newt bat and similar surveys save time money and induce some common sense which is severely lacking across the public sector. Run PCC like a private business and employee half the number of people!	Comments noted. The Development Plan process operates within a legislative and technical framework which often reduces flexibility. However, the purpose of the development plan is to achieve sustainable development outcomes which means balancing and integrating environmental, social, cultural and economic considerations.
Anon 5	<b>Objective 12</b> - encourage self build schemes with more flexibility given to one-off self build houses. <b>Objective 21</b> - promote renewable energy in new homes in line with the current Building Regulations standards	Comments noted and the text has been changed in KI.10 and Objective 12. Detailed policies will be developed for the Deposit Plan including consideration of building standards.
Anon 6	Perhaps in Tourism. No one wants to come and see our magnificent mountains bristling with vast parks of revolving wind turbines,...all in the name of exporting ' green energy '. One objective could be to equip all new builds and existing farm buildings with solar power panels. They already sit on the grid....so no need for defacing power lines along areas of outstanding beauty....again discouraging tourists who come to see a non-industrialised landscape. I believe there is a government incentive till 2027 to install more. This is not widely publicised. Again. More	Thank you for your comments. The planning system is challenged with balancing competing aims. Landscape and Tourism are identified in the K.I. and Objectives although Green and Renewable Energy still has to feature as a main consideration alongside. More detailed requirements



	<p>money is needed but not from overseas pension investors.</p>	<p>are expected to be developed later and may be contained in Supplementary Planning Guidance (eg the idea re: solar power on larger buildings).</p>
Anon 7	<p><b>Objective 1 – Climate Change</b> - again refers to the transition to Net Zero - is this the Government's 2050 target, or the Council's 2030 ambition?  <b>Objective 5 – Sustainable Travel</b> - reference could be made to ensuring development considers the Sustainable Transport Hierarchy</p>	<p>Comments noted, wording changes have been made.</p>
Anon 10	<p>The objectives sound good, but again, there is no mention of better building standards being set, and monitoring and enforcement against financially driven developers.</p>	<p>Comments noted.</p>
Anon 11	<p>K1.1 Would like to see "innovative" added to the wording. Encourage more nature based solutions...its not all about building higher defences but could include better planting of shrubs and trees (does not always need to be trees and better support for wildlife) to capture/store and divert run off etc  K1.2 &amp; K1.3. Would like to see specific reference to reversing the damage already done to rivers  Ensure that there is "joined up" and innovative thinking so plans don't contradict each other. Development of service hubs (regional growth hubs) and supporting facilities is great, however, if you live outside one of these areas you have to get in your car each time you want to access them which contradicts the Active Travel objectives.</p>	<p>Comments on K.I. rather than objectives. K1.1 wording has been changed.   K1.3 and Objective 3 wording has been amended to include restoring resources as well as protecting. Agreed on the need for joined up thinking.</p>
Anon 12	<p>The objectives are all very noble but will require economic growth and investment to pay for the changes necessary.</p>	<p>Comments noted.</p>
Anon 13	<p>It will spoil the community feel of Montgomery, this is what the ethos is, a small community but the larger it goes the more we will lose the community feel</p>	<p>Please ensure you make your views known on the future you see for Montgomery at the Preferred Strategy stage. These comments relate to a site in the current</p>

		(Adopted) LDP and as such are not part of the current consultation.
Anon 14	Comments made that night by the only resident on station road as no one knew about this, landscape will be affected, the fantastic views from the castle will change forever, the verlon estate floods, the potential of artifacta as ancient battleground, the loss of community feel, the lack of infrastructure in the town e.g. drs, sewerage, etc	Please ensure you make your views known on the future you see for Montgomery at the Preferred Strategy stage. These comments relate to a site in the current (Adopted) LDP and as such are not part of the current consultation.
Anon 16	<p><b>1. Climate change:</b> reference Race to Zero and territorial decarbonisation goals, including from imported products.</p> <p><b>2. Nature recovery:</b> reference agroecological agriculture - it is not a zero sum game between food growing and rewilding.</p> <p><b>3. Natural &amp; build environments:</b> where local distinctiveness and character have already been destroyed, they can be rebuilt. For example, the farming landscape has been stripped of people and local trading is minimal. This needs restoration of an ancient heritage.</p> <p><b>9,10,12. Sustainable settlements &amp; communities + future needs + homes.</b> This needs to include more affordable dwellings for farming, where existing farm buildings are now purely residential and so expensive that young people are excluded.</p> <p><b>15. Economic development.</b> Building a foundational economy in agriculture is largely a housing and access to land problem.</p>	Thank you for your comments which have been carefully considered in reviewing the draft KIVO.
Anon 18	<p><b>Objective 2</b> should in addition acknowledge that biodiversity and nature resilience can best be supported through improving green infrastructure and the connectivity of ecological networks across County boundaries as well as within Powys itself.</p> <p><b>Objective 16</b> should include extending the benefits of the Mid Wales Growth Deal beyond those parts of the County which already have well-established tourist infrastructure, such as the Elan Valley. This would both expand Powys' range of</p>	<p>Thank you for your comments which have been carefully considered in reviewing the draft KIVO.</p> <p>Some of the matters raised would be best dealt with through later Plan stages when</p>

	<p>attractions for visitors, and hence better distribute the income derived from tourism, and also mitigate the excess impacts of 'honeypot' status whereby known attractions are degraded through an overwhelming concentration of visitors.</p> <p><b>Objective 17</b> should in addition include the restoration of tourism-related assets, since many of the public rights of way and open spaces are currently in a degraded condition and in many cases inadequately signed or provided with visitor facilities such as parking and toilets.</p> <p><b>Objective 20</b> should include a requirement to have regard to need to maintain landscapes and the importance of quiet spaces when improving digital communications.</p> <p><b>Objective 21</b> should include a proviso that renewable energy generation be promoted insofar as it is compatible with protecting and enhancing landscape, biodiversity and the interests of local communities.</p>	<p>detailed policies are being developed.</p>
Anon 19	<p>I would like to see a plan on how the objectives are to be achieved,</p>	<p>The RLDP will be subject to a monitoring framework (see Adopted Plan Annual Monitoring Report for example) which will assess how the Plan is being implemented and if Objectives (with associated measurable Targets) are being achieved.</p>
Anon 20	<p>Ensuring that the infrastructure can cope with new developments is key. Doctors and dentists are of particular concern but also to ensure that the sewage infrastructure is adequate.</p>	<p>Noted, thank you.</p>
Anon 21	<p>the objectives reflect the issues and need subsequent changes</p>	<p>Agreed, any changes to the K.I. will need to feed through to the objective setting.</p>
Caersws Community Council (Have your Say Survey, respondent 26)	<p><b>Objective 21:</b> Improving electricity Grid Capacity to enable appropriate renewable energy generation to be developed.</p> <p>An action plan on how the LDP will be</p>	<p>Thank you, noted. It is agreed that Grid Capacity needs to be included more overtly in the KIVO.</p>

	delivered and time scales involved should be included in the objectives.	The Replacement Plan is being drawn up in accordance with an approved Delivery Agreement. A Monitoring Framework will be devised later in the preparation stages (at Deposit Plan) and once adopted the framework is used to test the adopted Plan annually.
Anon 27	Will they be achieved?	Noted.
The Leith Group representing EPC-UK (1)	We further trust in the revisions associated with the current draft Plan Objectives that the above points in relation to existing businesses, operators and employers, and the wider plan issue of community safety and hazard sites will also be reflected once the formal document is placed on consultation later in 2024.	Noted, thank you. Wording Changes have been made. Detailed policies will emerge at the Deposit Plan stage.
CarneySweeney on behalf of Bute Energy (2)	<p>As above, we would suggest that it is imperative that each of the objectives are explored in further detail with key stakeholders to ensure all relevant legislation, targets, constraints and opportunities are taken into account as the Replacement LDP policies on each key issue and objective are developed to ensure they are effective and deliverable. Furthermore, objectives should be complementary. For example, onshore wind can contribute to addressing the nature emergency, the climate emergency and the cost of living crisis.</p> <p><b>Objective 19</b> relates to infrastructure, including physical infrastructure, and therefore must be read as including energy generation infrastructure, such as wind turbine developments. As such, text requiring development “in places that are best served by existing or planned infrastructure and services” seems inappropriate due to the inevitably remote nature of wind energy developments.</p> <p>We note that <b>Objective 20</b> includes seeking “comprehensive coverage of digital infrastructure across the Plan area” – a pseudo target.</p>	Thank you for your comments. Changes have been made to the KIVO.

	<p>However, <b>Objective 21</b>, relating to renewable energy generation, contains no such target. We believe stretching targets for renewable energy generation would be helpful for inclusion as an LDP objective.</p>	
<p>CPAT – Clwyd-Powys Archaeological Trust (3)</p>	<p>In <b>objective 3</b> it would be useful if the wider historic environment could be mentioned as well as just mentioning the historic built environment here. The historic environment includes a vast number of designated and non-designated sites recorded in the Historic Environment Record which is maintained by the Welsh Archaeological Trusts and all of these sites make up a finite and non-renewable resource which needs to be cared for and protected.</p>	<p>Comments noted, the objective has been revised.</p>
<p>Natural England (4)</p>	<p><b>Climate Change</b> We welcome this policy direction and advise looking more broadly at how zero carbon can be achieved. For example, healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person’s carbon dioxide emissions over the course of a whole year. Natural England has produced the “Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate” to help to make informed decisions about adaptation.</p> <p><b>Nature Recovery and the Sustainable Management of Resources</b> In addition it may also be useful to understand the current levels of accessible natural greenspace in the plan area.</p> <p><b>Key Planning Principles, Placemaking, Health and Well-being.</b> We welcome this policy direction, specifically the links to the natural environment and reducing pollution and carbon.</p> <ul style="list-style-type: none"> <li>- Natural England continuously works on green infrastructure and has a number of publications on health and the natural environment. We have published Green Infrastructure Standards (<a href="http://naturalengland.org.uk">naturalengland.org.uk</a>), which define what good green infrastructure ‘looks like’ for local planners, developers, parks and greenspace managers and</li> </ul>	<p>Thank you for your comments which have resulted in some amendments to the KIVO. Accessible greenspace will be part of an Open Space Assessment/Policy approach.</p> <p>The reference sources are useful, thank you.</p>

	communities, and how to plan it strategically to deliver multiple benefits for people and nature.	
B Dennison (6)	<b>Objective 12</b> includes the term “high quality new homes”; and in my view there is a serious risk of losing sight of the fact that energy efficiency is best thought of in terms of high levels of insulation, air-tightness and ventilation, across the full range of new homes. This needs to be better reflected in <b>Objective 12</b> and also in Key Issue 10 which should overtly and inextricably link ‘Planning for New Homes’ with ‘Energy Efficiency and Minimisation’.	Thank you for your comments which have resulted in changes to the KIVO text.
Chair - Powys Local Access Forum (Have your Say Survey, respondent 25)	<p><b>Objective 3</b> – national, historic and built environments There is another opportunity here to refer to arresting the decline of the rights of way infrastructure and seeking to enhance it.</p> <p><b>Objective 8</b> – health and wellbeing Can walking, horse riding and cycling be added to the activities mentioned here please?</p> <p><b>Objective 13</b> – community facilities and assets Reference is made to safeguarding and public open spaces. Can public rights of way and common land be added please?</p> <p><b>Objective 17</b> – tourism There is reference here to “safeguarding” public rights of way but it would be more appropriate to refer to “improving and enhancing”.</p>	Thank you for your comments and suggested changes. The wording has been reviewed and some changes made.
Avison Young (Agent) on behalf of site promoter (14)	<p>The Objectives relate well to the Key Issues identified. Crucially, <b>objectives 15 and 17</b> relate to tourism development and constitute the main considerations for the purposes of our client. Each is addressed below:</p> <p><b>Objective 10 – Meeting Future Needs</b> Our client acknowledges this objective to meet the identified needs for homes and jobs through the provision of new and improved opportunities for people to come and live and work in Powys. Should the Council seek to allow for the residential provision of the Holiday Park, as highlighted above, this would provide the Council with an opportunity to provide low-cost affordable homes which in turn would help to provide opportunities for</p>	Support noted, thank you.

	<p>traditional dwellings to be made available to first time buyers.</p> <p><b>Objective 15 – Economic Development</b> Our client agrees with this objective but would add that economic development in and around existing settlements should also be an important spatial feature of this objective.</p> <p><b>Objective 17 – Tourism</b> Our client agrees with this objective.</p>	
<p>Cyfoeth Naturiol Cymru/Natural Resources Wales (7)</p>	<p>3.2.2 <b>Objective 2</b> page 16 We welcome your commitment to increasing resilience and enhancing bio and geo diversity in Powys. We would like to stress the importance of encouraging development that contributes to carbon sequestration.</p> <p>3.2.3 <b>Objective 8</b> page 17 We welcome this objective and suggest this could be made measurable by recommending it meets the size distance criteria for the provision of accessible natural greenspaces as described in the Greenspace toolkit (mentioned above)</p> <p>3.2.4 <b>Objective 9</b> page 17 We welcome this objective and would like to reiterate the need to include strategically placed, large species of street tree to cast the shade required to keep the public realm liveable in the climate-challenged future.</p> <p>4.1.1 (Assessment Matrix) We recommend also referencing the Mid Wales Area statement</p>	<p>Thank you for these constructive comments which will be carefully considered in the review of the Objectives.</p> <p>Some of the suggestions made may be most instrumental at the detailed policy drafting stage.</p>
<p>Newtown &amp; Llanllwchaiarn Town Council (10)</p>	<p>KI.4 - Are there any intentions to introduce sustainable public transport in the county? It would be beneficial to witness the deployment of Ultra Low Emission Zone (ULEZ) compliant public vehicles in our towns and villages. Could incentives be incorporated to make the use of public transport more appealing and affordable for residents? Additionally, in areas of Newtown where public transport access is currently lacking in some areas, is there a plan to enhance public transportation routes and networks to encourage increased usage? The acknowledgment of limited access to active travel and public transport in rural areas prompts the question of how these limitations can be rectified. Consideration should be given to improving and expanding path networks between villages and towns, exemplified by potential enhancements to the canal paths for routes like Abermule to</p>	<p>Thank you for these detailed and interesting comments. These “cover a lot of ground”, not all of which is in the control of the RLDP process. The Council will carefully consider what changes may be appropriate to the KIVO in the light of the issues/concerns raised by Newtown &amp; Llanllwchaiarn TC. It is also considered appropriate to share the comments to the Sustainable Powys</p>

	<p>Newtown. Encouraging initiatives such as car sharing or electric car share schemes, especially in remote settings, should be explored, and the development of new sites should inherently prioritise access to walking, cycling, and public transport. Perhaps also consider bike hire schemes in towns similar to that found in larger towns and cities, they could be piloted on a smaller scale to see how successful they are.</p> <p>KI.7 – The absence of any reference to sport facilities or coaching programs in Key Issue 7 prompts the inquiry into the consideration of sport in promoting healthy lifestyles. Sport Wales research indicating a low engagement rate in organised sports for Welsh children, compared with a high ownership of bikes, necessitates an exploration of initiatives to bridge this gap.</p> <p>KI.10 - The observation that new homes in Newtown predominantly consist of 1- and 2-bedroom flats, potentially disadvantaging families, underscores the need for a more diverse housing mix. The imminent need for increased housing in towns and villages suggests that boundaries may need to be expanded or modified, prompting a recommendation for thoughtful consideration of boundaries within the LDP.</p> <p>It is also important to address the need for more housing developments in the Newtown area. As the town's population continues to grow, it is essential to explore various strategies to bolster the residential aspect of the community. This could involve initiatives such as incentivising developers to build larger family homes, encouraging mixed-use developments that incorporate residential spaces, and collaborating with local authorities to streamline planning processes for new housing projects. Additionally, exploring innovative housing solutions and engaging with community stakeholders to understand their housing needs can play a pivotal role in shaping a sustainable and inclusive residential landscape for Newtown's future.</p> <p>KI.11 – Forging a vibrant economy necessitates strategic planning for bypassed communities, both existing and those planning future bypasses. The experiences and knowledge gained from developments around the bypass in Welshpool offer</p>	<p>board and at Senior Manager Level.</p>
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	<p>valuable insights that can inform decision-making in other areas. Suggesting the potential value of a case study to comprehensively assess the impacts of a bypass, encompassing factors like traffic, visitors, and tourism, underscores the importance of sustained support for towns post-bypass completion to mitigate potential adverse effects.</p> <p>KI.12 – It is important to encourage the establishment and creation of new food focused rural enterprises allowing the creation of short supply chains from growers and producers to our market towns and villages.</p> <p>KI.16 – In the realm of well-being, the absence of specific considerations related to safety, crime prevention, and safeguarding prompts inquiry into elements such as street lighting, security measures, CCTV, and policing strategies.</p> <p>KI.18 - The presence of Place Plans, Town Centre Investment Plans, or Placemaking Plans in most towns within the Powys LDP area invites scrutiny into the nature of Powys County Council's relationship with these plans. How Newtown's Place Plan aligns with decisions at the county level, and whether the County Council collaborates with or is influenced by individual place plans, raises questions about the potential development of a standardised framework or template for comprehensive oversight.</p> <p>KI.18 - The closure of shops and the resulting vacancies in Newtown, mirroring trends seen in towns and cities nationwide, underscores the need to devise pragmatic, long-range plans for High Streets. Given the shifting dynamics of retail, it is essential to explore potential avenues for repurposing.</p> <p>Embracing the idea of repurposing our currently vacant retail spaces emerges as a wise strategy. It is our aspiration to see the town centre revitalised and transformed into a thriving economic hub. It is vital to maintain affordability and accessibility in these spaces, empowering individuals with the ambition to introduce innovative ventures into the town.</p> <p>We want Newtown to deliver a positive and memorable experience for both residents and</p>	
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	<p>visitors, becoming a source of pride with a renewed sense of vibrancy.</p> <p>KI.19 - The desire for additional information about the future of wind farms, pylons and battery storage in the county within the long-term energy plans, and the examination of their impact on the landscape, highlights the need for clarity on these crucial aspects of the LDP.</p>	
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**Question 4 – Do you have anything else you want to mention in relation to the Key Issues, Vision, and Objectives?**

-	Representation	Council Response
Anon 2	<p>The main policy aims appear to be directed towards the 'climate emergency' and 'net zero' which are totalitarian ideologies.</p> <p>A totalitarian mentality is to see 'every conceivable action as an instrument for something entirely different' (Arendt, 1958)</p> <p>To build a house is for someone to create a home, to travel to see friends and family is to share life together, to attend school is to learn, grow and discover. They are not opportunities to 'reduce emissions' or any other arbitrary council policy.</p> <p>The vision states that "Residents will live safer, healthier, and greener lives within an outstanding physical and cultural environment." This is propaganda.</p>	Noted, thank you.
Anon 3	It's the right set of issues, but a bit more sense of grassroots-up motivation to energetic change is needed, as opposed to visionary woolly words.	Noted, thank you.
Anon 4	This is typical vacuous rubbish from a set of people who should get jobs in the private sector to understand the value of money. Only then will the	Noted.

	money pit that is PCC spend the tax payers money with care	
Anon 6	<p>It is rewarding to see Powys realising that we have to have regenerative farming to improve our soil qualities and water run off. Farmers must be encouraged to go down this path. Again.....money is needed to help our vital rural economy and keep farmers present and future on the land. It has to be a viable way of,life and develop local resources to grow and sell,local,produce via local outlets ....ideally pulling people away from driving to the nearest supermarket. IPU's have been allowed to over populate and pollute land and water ways Powys . Hopefully Powys will develop alternatives to destructive soya feed for animals.</p>	Thank you for your comments on agriculture, land-use and the rural economy.
Anon 10	<p>This document is not written in a way that will engage with the public - is that intentional? it is aimed at those that know planning and legislation and therefore alienates the majority of the public that have no great legal knowledge of this arena.</p>	Noted. As a consultation document this was certainly not intended to disengage the public.
Anon 11	<p>Again, need to have some joined up thinking. Waste recycling would be a good example I live in Rhayader. If I had a small electrical item to be recycled, I would have to get in my car to drive to Llandrindod to dispose of it as Llandrindod is being developed as a Regional Growth Area and therefore has investment to develop services there. This goes against the Active Travel Agenda and is a direct barrier to Waste Recycling. How will the plan address those challenges? This is where there needs some innovative thinking...you could perhaps organise a monthly "drop off" in town for local residents to dispose of such items that would satisfy both objectives.</p>	Thank you for your feedback and ideas – we will share your views with the Waste & Recycling section of the Council.
Anon 12	Economy needs to be boosted by encouraging tourism and upskilling	Thank you for your comments which do align to

	<p>the workforce. The environment needs to be managed to encourage biodiversity by tackling agricultural and sewage discharges into our rivers and streams, and by planting more areas of deciduous woodland and scrub.</p>	<p>the Key Issues and Objectives outlined for the RLDP.</p>
Anon 13	<p>Look for an alternative site please rather than Verlon, the landscape will change for ever, do something good and look elsewhere, Montgomery has already had a big development, and another 2 in the last 20 years, are any more needed ? It will completely change the feel of the town.</p>	<p>Noted, responded to in earlier sections.</p>
Anon 14	<p>Please don't change our lovely Montgomery.</p>	<p>Noted, responded to in earlier sections.</p>
Anon 15	<p>The only comment I have is that there is no opportunity currently for young persons to step onto the property ladder in rural communities . Affordable house building is based upon the need recorded on the Homes in Powys Social Housing Register i.e. council housing and which does not take into consideration the combined need identified through the LHNA. There is no affordable housing development strategy on which to build 'shared ownership' housing for those rural communities, - communities where rural working hours are generally self employed, long hours and poorly paid.</p>	<p>Noted. Rural housing is a matter which will need to be further considered in the RLDP. The importance of access to rural housing and "living locally" will need to be recognised if we are to support the Foundational Economy of the Powys LDP area. The Council do operate an Affordable Housing Register which is separate to the Social Housing Common Housing Register and designed to capture individuals who are finding barriers to market housing in their local area. Wording changes are now included in KI.10 and the associated Objective 12.</p>
Anon19	<p>The document is full of ideals, but I saw no plan of how Powys Council will achieve any of these objectives.</p>	<p>The purpose of the KIVO is essentially to set an agreed framework around which the rest of the RLDP can develop with a view to achieving the right outcomes and meeting/achieving the objectives for land use and development over the period to 2037. More details will be</p>

		published in later versions and once the Plan is fully adopted it will control planning decisions and be monitored for its effectiveness.
Anon 20	Public transport is key if public services are going to be concentrated in the larger towns. Where possible small businesses need to be encouraged in villages in order to provide local employment and enterprises such as village shops and farm shops which reduce peoples need to travel should be encouraged.	Noted and agreed.
Anon 21	overall I want the Plan, even at this stage, to make clear that the plan making and development management processes will be driving sustainable growth, actively promoting appropriate development to support existing and future generations of Powys. it doesn't shout that sufficiently to me yet.	Thank you for your feedback.
Anon 24	stop building housing estates in language sensitive areas - it changes the language balance and makes English the dominant language thus weakening Welsh as a community language	Comments noted.
Caersws Community Council (Have your Say Survey, respondent 26)	Enactment of the LDP is crucial and ensuring that large developers do not get plans through that do not adhere to the LDP.	Thank you for your comments.
Anon 27	All sounds good on paper but will all of these issues be taken into account, or is this just another tick box exercise? Will there be any enforcements of conditions when a site is approved for planning? And, if at such a date after the adoption of the revised LDP, major issue/s are discovered, is there a clause that allows for said site to be removed or will the proposal merely	Noted. Land allocations in the LDP/RLDP do mean that planning permission is acceptable in principle. However, applications still need to meet all the relevant planning tests.  Enforcement matters should be raised with the Development Management team.

	go through BECAUSE IT IS ON THE LDP????	
Bausley with Criggion Community Council (15)	<p>Recently my Councillors (and I ) saw a Channel 4 program ‘The Great Climate Fight’ with Kevin McCloud , Hugh Fearnly - Whittingsall and Mary Portas, which interested them greatly. In particular was the section on why can’t councils insist on better specs for housing rather than the bare minimum required to meet Building regs? They feel that any LDP for the future should not be missing out the chance to set out better standards of housing particularly in heating and costs to run for householders? A commonly held belief by many in the Community is that developers do enough to get by whilst maximising profits but to the detriment of householders and the Environment?.</p>	<p>Comments noted. Thank you for the information. This particular issue has been raised by other respondents and some additions have been made to the KIVO wording to emphasis more sustainable and energy-efficient design and build. Mor detail on design standards will be considered in the later stages of preparing of the Plan.</p>
A Yates (16)	<p>May I also mention that public electric car charging stations were left out in your development plan ending 2037. Tourism needs these . Wales needs these if it is to encourage electric car use age and future tourism.</p> <p>Also the fact that Wales is 3rd in the world (?) re the successful handling of its recycling waste . Is this so ? We should hear more about this and how it is achieved. France has a system where by you take your waste .....unwanted goods etc to the ‘decheterie’ recycling centre and you can load up with compost made from unwanted matter. It is free to bag up or shovel into your trailer . It’s good useful stuff. Why are we in Powys not enjoying the free.....peat free compost created from the food, garden waste etc collected each week from most households. What happens to it? South Cambridgeshire were about to launch the same scheme 20 yrs ago. Then they could supply for lorry loads of compost to public gardens etc and even school projects. Surely it is about time Powys</p>	<p>Thank you, noted. Changes have been made to reference ULEV needs more.</p> <p>We can pass your ideas regarding waste and compost to the waste section of the Council.</p>

	got its act together to provide the same facility .....or perhaps it does and it is not widely known.	
PCC Countryside Access and Recreation (13)	<p>We are pleased to see reference to the importance of greenspace and outdoor recreation, including the public rights of way network. However, we would comment that there is no specific mention of outdoor play provision and access to greenspace for children and young people. This is really important for the wellbeing of the county’s children and young people, so we would like to see it referenced as part of the vision and objectives.</p> <p>The importance of public rights of way and outdoor recreation opportunities for tourism need to be highlighted through the replacement LDP, given the reliance on these by local tourism businesses. Public rights of way do also form part of the Active Travel network, both in the designated towns and as links to and within other settlements.</p>	Thank you for your comments, the KIVO wording has been reviewed.
The Mineral Products Association (MPA) (17)	<p>Mineral supply will be critical to delivering many of the objectives identified. As evidence by the AMR minerals safeguarding has been frequently overlooked in the development management process. The policies in the plan need to be more robust. Further, the evidence base must reflect up to date reserve and sales statistics.</p>	Thank you for your comments and the attention to the current AMR (Adopted LDP) and minerals safeguarding. The Council will consider if the wording needs to be reviewed in the KIVO and how your concerns may also be addressed through later Plan stages including detailed policies.
Mr J Philipps (18)	<p>I have found no mention of ‘community agriculture’, nor places for people involved in such enterprises to live. This is in contrast to Bannau Brycheiniog’s plans, which includes some of Powys. What plans for community agriculture do you have, please, including places for those workers to live? Can these be keyed on the maps, please?</p>	Noted. Rural housing is a matter which will need to be further considered in the RLDP. The importance of access to rural housing and “living locally” will need to be recognised if we are to support the Foundational Economy of the Powys LDP area. KI.10 and KI.12

		<p>wording has been updated. You may be aware of a group called <b>Our Food 1200</b> (1200 acres of land in 3-10 acre plots) – for modern, regenerative fruit and vegetable farming for local markets:  <a href="https://ourfood1200.wales/">https://ourfood1200.wales/</a>                  – we understand the BBNP are linked to this.</p> <p>FYI Settlement maps will not be produced until the Deposit Plan but in line with past practice, these are unlikely to include isolated settlements or identify any small sites or those that would be “exceptions” to normal housing policy. These sites are typically not controlled by land allocations but instead by a policy approach which sets out criteria to be met – detailed policies will appear in the Deposit Plan. The Preferred Strategy will set the framework and establish a Sustainable Settlement Hierarchy. The Preferred Strategy will be open for comments.</p>
<p>Avison Young (14)</p>	<p>Concluding Remarks: Overall, our client – the owner of Caer Beris Holiday Lodge Park – broadly agrees with the Key Issues and Objectives outlined in the Powys Replacement LDP Consultation document. Several additions and amendments to four specific KI are suggested to ensure that the Council fully consider the opportunities available through the provision of caravan sites for the plan period.</p> <p>Separately the proposed Vision makes no reference to tourism, which is surprising given the recognition of the importance of tourism in the KIs</p>	<p>Thank you for your comments which have informed the revised KIVO. Please note that site specific issues (e.g. on proximity to a sustainable settlement etc) are not being considered at this stage but will be part of Candidate Site Assessment.</p>



	and objectives. Therefore, an amendment to the Vision to include tourism is also suggested.	
Natural England (4)	<p>HRA: Important designations should be identified to inform both the plan and its Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment. We advise that your authority should undertake a Habitats Regulations Assessment (HRA) to assess potential impacts of the plan on internationally designated sites, including but not limited to the following sites in England:</p> <ul style="list-style-type: none"> <li>• River Wye Special Area of Conservation</li> <li>• Wye Valley and Forest of Dean Bat sites Special Area of Conservation</li> <li>• Wye Valley Woodlands Special Area of Conservation</li> <li>• Severn Estuary Special Area of Conservation.</li> </ul> <p>You should also consult with Natural Resources Wales regarding designated sites in Wales.</p>	Thank you for your comments which are being shared with the ISA/HRA appointed consultants and the Council's Ecologist.
Mr P Foulkes (19)	<p>Firstly. In the Review Report I can find no mention of the proposed North East Wales National Park a big section of which would be in Powys. Perhaps this should be no surprise to me as the Review Report is dated Feb 2022, way ahead of Welsh Governments proposed (in my opinion, misguided) NP coming to light. I also see that at a recent full meeting of Powys CC councillors the majority were not in favour of the NP. Nevertheless, in a subsequent draft of the replacement LDP the proposed NP, at least those parts in Powys, should be formally rejected. However, another, aspirational designation should be built into the LDP, that of the Cambrian Mountains NP or AONB, much of which would lie within</p>	<p>Please note this consultation was in relation to the proposed Key Issues, Vision and Objectives for the Replacement Plan (2022-2037). The 2022 Review Report on the Adopted Plan (2011-2026) is a finalised document which has relevance to the Replacement Plan.</p> <p>As the Replacement Plan is being prepared it will need to be updated to reflect any agreed progress on the National Park proposals as they apply to the Plan area. At the current time it would be premature to reference the new NE Wales National</p>

	<p>Powys. After many years of campaigning by various bodies (and almost a NP designation in the 1970's) the situation is still live and as such should be included in the LDP.</p> <p>Secondly. This concerning the detail, <b>or lack of it</b>, in the LDP. In the housing allocation section of the report I read that Caersws has (at the time of writing) planning permission for 43 units. In the employment allocation section, that 3.4 hectares of land has been permitted for commercial development. So, lots of detail when it comes to these areas of the LDP but in other areas there are no such detailed considerations, or indeed, any consideration. Some examples:</p> <p>a) I can find no details of provision, and maintenance, of Public Rights of Way other than in Appendix D (part 9) and that from the Powys Local Access Forum. Just one instance of how the LA should be addressing the provision of an appropriate PRoW is with the Monks Trod across the Elenydd uplands.</p> <p>b) Nether in sections 8.11 (Environmental Protection) or 9.2 (Habitat Regulations Assessment) can I see any mention of a linear habitats action plan and yet roadside verges represent some of the best habitats in what is largely an overgrazed County.</p> <p>c) This concerning Sustainable Energy, section 8.7 - whilst the report acknowledges that it is Welsh Ministers who are responsible for permitting on-shore projects with a capacity over 10MW but it is the LA's responsibility to oversee projects less than 10MW. However, in section 8.7.5 it states that this involves a "landscape sensitivity study" but what it does not say is that this should include a cumulative impact</p>	<p>Park. The Council notes your objection to the proposal. The Replacement Plan is not the mechanism to "formally reject" any such proposal.</p> <p>There will be more detail on housing supply and employment land allocations, including proposals in each settlement, firstly when the growth and spatial options evidence is ready (Preferred Strategy) and secondly, on maps, when the Deposit Plan is published.</p> <p>The KIVO has been updated to mention p.r.o.w. more although this Plan is not the main plan dealing with the maintenance or improvement of the p.r.o.w. network.</p> <p>Comment on linear habitats is noted. The Replacement Plan will need to align to Powys Nature Recovery Action Plan to help ensure it is instrumental in nature recovery. The N.R.A.P. includes more specific details on how habitat restoration is being planned and will be considered in the planning policy work on strategic Green Infrastructure (G.I.) including G.I. Assessment and Mapping.</p> <p>Thank you for your comments on individual and cumulative impact (landscape) of proposals regarding renewable energy, which has also been raised by other stakeholders. Planning Policy</p>
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	<p>assessment. Here I point to the landscape north of Llangurig in which, in the past, the LA has permitted a large number of individual medium sized wind turbines effectively making a wind farm landscape. This should not be allowed to happen any further, at least for the duration of the 2022-2037 LDP.</p> <p>I hope public consultation meetings around the County will take place for the renewed Plan.</p>	<p>Wales (PPW) includes a number of references to the risks of cumulative impacts and the Replacement LDP needs to be in conformity with PPW and Future Wales. The KIVO has been revised.</p>
<p>Cwmpas (previously known as the Wales Co-Operative Centre) (20)</p>	<p>Cwmpas welcomes especially the direct and explicit reference to community led housing in <b>Key Issue 10 (K1.10) Planning for New Homes</b> Paragraph 1.3.35 and also within <b>Objective 12</b> though Cwmpas believes that community led housing will contribute significantly within the wider <b>Objectives 9, 10, 11, and 13</b> within the area of Sustainable Communities, Housing &amp; Services. Indeed, such is the cross cutting nature of such forms of affordable housing delivery, there is a clear and positive integration to the Vision statement within the consultation document.</p> <p>For a scheme to be ‘community led’, the community must be integrally involved throughout the process of the development in terms of identifying the need and maintaining a strong involvement in delivering housing to meet that need even though in some cases the community does not necessarily have to initiate and manage the development process itself or build the homes themselves. Indeed, there are many ways for people to be involved in meeting their own housing needs. Community groups may respond to housing needs in their local area and seek to deliver their own homes. Local authorities, landowners, Registered Social Landlords (RSLs)</p>	<p>Noted thank you. Support for KI.10, Objective 12, comment on relationship to other Key Issues and Objectives, support for the focus on placemaking and good quality design plus additional information/ signposting and detail on the role that community led housing can play and examples of policy intervention</p>

	<p>or small builders may seek to provide housing that benefits the local area in perpetuity, and work with the community to enable this to happen. However, all such community led housing schemes are characterised by providing housing for the local community that is affordable and available in perpetuity and by providing far greater certainty to local communities as to who the housing will be occupied by and potentially offers new opportunities and benefits for sustainable local economic, social and environmental development. Finally, it is important to recognise that community led housing is not a case of 'one size fits all' as it can come about for a number of reasons and take a number of different forms. For example, co-housing is a design methodology used by intentional communities to create spaces that promote connectivity and togetherness; housing co-operatives are housing organisations controlled, managed and owned by its members; and Community Land Trusts (CLTs) are legal entities set up by communities to provide and protect assets of community value such as genuinely affordable housing. As such, no two projects are the same. Community led housing can be adapted and moulded to create bespoke solutions that address particular issues and factors, whether socially or spatially, that have led to a group forming. In summary, community led schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes and in a manner of their choosing; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in</p>	
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	<p>perpetuity. More specifically, community led housing directly addresses the issues and challenges within Powys as identified in the KIVO document in terms of:</p> <ul style="list-style-type: none"> <li>• Rebalancing demography through the creation of affordable community led housing that will create opportunities to retain and attract young people and thereby foster social and economic sustainability of the communities of Powys;</li> <li>• Addressing inequality by increasing the amount, quality and choice of affordable housing options within the County;</li> <li>• Addressing the climate emergency with net zero housing developments that are inherently sustainable in terms of build standards and technology, founded upon placemaking principles, reduce dependence of private modes of transport in favour of active travel and which provide green spaces and local food production opportunities;</li> <li>• Addressing the nature emergency where preservation and enhancement of the biodiversity qualities of a site is a key component. It is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of ‘home’ and ‘place’ become more important than ever. Cwmpas believes that these elements are essential to fostering community cohesion, resilience, safety and connection, and creating places and environments where the health and well-being of individuals, residents, business and communities can thrive and flourish and reach their full potential based on community led affordable housing delivery at its heart. As such, community led housing will be fundamental both to</li> </ul>	
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	<p>the qualitative nature of new affordable housing in the County and to the quantitative targets of delivering upon the new affordable homes targets for the emerging RDLP. Moreover, as well as further indirect impacts and outcomes on all seven of the WBFG Act goals, there is a direct correlation of community led housing with those goals concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales. In making these positive comments on the explicit reference to community led housing in the KIVO, as a signatory to the to the Design Commission for Wales Placemaking Charter under its previous name as the Wales Co-operative Centre, and with reference to the Placemaking Guide 2020, Cwmpas believes that there is direct integration and correlation with the essence of community led housing and national planning policy as contained within PPW Sustainable Placemaking Outcomes in terms of social, environmental, economic and cultural well-being thus:</p> <ul style="list-style-type: none"> <li>• Creating and Sustaining Communities – community led housing promotes health and well-being and globally responsible Wales principles in the WBFGA legislation and makes a very direct and clear link between housing development in a community and meeting the housing needs of that community whilst allowing that community genuine input into the development process. Furthermore, the functionality of community led housing for example in terms of the sense of community, shared spaces and facilities, and social interactions is demonstrative of the essence of creating cohesive communities;</li> <li>• Facilitating Accessible and Healthy Environments – for example, a key design principle of community led housing is to reduce dependence on</li> </ul>	
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	<p>private modes of transport and to encourage active modes of travel within the sustainable transport hierarchy. Furthermore, community led housing is a community facility or asset as it is the delivery of affordable housing by the community and for the community;</p> <ul style="list-style-type: none"> <li>• Maximising Environmental Protection and Limiting Environmental Impact – community led housing addresses sustainability in its broadest sense of social, environmental, economic and cultural sustainability by creating viable and sustainable places through for example shared facilities and spaces such as growing areas, communal laundry or co-working hubs</li> <li>• Making Best Use of Resources – community led housing will often look to develop on brownfield sites or through repurposing existing buildings or on underused land where perhaps it is not viable for a private developer or RSL to develop new affordable housing. A good case study example here is Bunker Housing in Brighton (<a href="https://bhclt.org.uk/bunker-housing-co-op-starts-building/">https://bhclt.org.uk/bunker-housing-co-op-starts-building/</a> ) and in this context Cwmpas would welcome opportunities to engage with community groups on sites that might be considered too small, go unnoticed or present technical challenges to bring such sites forward for community led affordable housing;</li> <li>• Growing Our Economy – community led housing contributes and responds positively to new patterns of work in developing places and environments for communal working or more sustainable spaces that balance work and living</li> </ul> <p>Furthermore, it is considered that the direct reference to community led housing in the KIVO document will address and remove some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need</p>	
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	<p>through genuine community level assessment and survey to supplement wider LHMA and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing will bridge the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognise the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs. Furthermore, a direct reference will establish the context for subsequent planning policy development in the emerging RLDP around affordable housing in terms of: site specific community led housing allocations or provision of such housing as a proportion (say 5 -10%) of the dwellings on larger strategic site; rural exceptions policies; and in the repurposing or more efficient and effective re-use of community building and land. In addition, there are proven examples across the United Kingdom of land assets and the disposal thereof being ring-fenced for development as community led housing with a leading case example being Bristol City Council - <a href="https://news.bristol.gov.uk/press-releases/7bfd6b25-f975-40b2-9468-5471a909da7a/groups-chosen-to-develop-community-led-housing-sites">https://news.bristol.gov.uk/press-releases/7bfd6b25-f975-40b2-9468-5471a909da7a/groups-chosen-to-develop-community-led-housing-sites</a>. Finally, community led housing proposals can have a positive impact on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English in local communities. For example, a recent paper by Dr Simon Brooks (Chair of the Commission for Welsh-Speaking Communities clearly</p>	
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	<p>outlines the extent of the impact of second homes in Welsh language communities. Cwmpas believes that this issue is a symptom of the imbalance of the housing market, and the lack of control people living in places across Wales have over the future of their communities. This necessitates policy intervention, and Cwmpas would welcome the opportunity to contribute our perspectives following our experience of working with community-led housing projects, social enterprises and co-operatives in Wales. Cwmpas considers that community-led and co-operative models of housing can play a crucial role in rebalancing the housing market so power rests with communities and community cohesion, resilience and well-being is prioritised at least to the same extent as profit and economic value. Community-led models support the housing needs of a local community, ensuring that there is sufficient affordable housing available, which in turn protects the survival of the Welsh language.</p>	
<p>Anon 9</p>	<p>No need at all for ‘climate change’ to be a factor, especially as going so will distort needlessly other matters of greater importance and relevance to the way we interact with and develop our built and natural environment. It should not be a factor in developing the PDP for Powys</p> <p>Sustainable transport for most people in a rural area is privately owned, privately operated motorized transport like cars, vans and pick-ups. These cannot – and indeed with regards to equity across classes and incomes – should be considered as an equal part of the transport ecology alongside rail and bus transport. Cycling is and only ever will be a bit-player, limited to those who are relatively young, in good health, have</p>	<p>Comments noted. The Development Plan process operates within a legislative and technical framework which demands attention “in the round” and compliance with higher-tier Plans and influences. As the purpose of the development plan is to achieve sustainable development outcomes (i.e. growth) there is a need to balance and integrate environmental, social, cultural and economic considerations. A failure to consider all the relevant issues including “conformity” with other plans and government priorities (such as decarbonisation) would</p>

	<p>no need to travel long distances, have no need to carry anything with them and travel on their own. Unlike other wheeled road users, cyclists make no dedicated financial contribution towards the upkeep of the road network.</p> <p>Quite how and why policy determining where homes, factories, workshops, shops and roads are built should be influenced by the Welsh language is unclear.</p> <p>The need for an overall increase in the number of houses and homes is clear from the high property values compared to incomes across much of Powys, growing waiting lists for council housing and more people claiming help because they are homeless. Enabling and increasing the net supply of homes, especially those for first and second time buyers or available to rent at social rents must be a top PDP priority, if not the top priority. This should include repurposing obsolete and redundant retail shops in town centres.</p> <p>Energy policy should be solely focused on maintaining and increasing the supply of 24/7 reliable, domestic electricity supply, extending the gas networks to those areas not currently connected and making provision for supporting, should the opportunity arise, small modular nuclear reactors. Encouraging the pursuit of unneeded, unnecessary and unachievable 'net zero' energy sources, such as windmills, will reduce the reliability of energy supply in Powys which in turn will adversely impact inward investment by business and increase the cost of energy for everyone.</p>	<p>lead to an “unsound” Plan which would not be adopted.</p> <p>The Issues are not listed in Priority order but we appreciate your views on housing being a top priority.</p> <p>A number of changes have been made in response to the various stakeholder comments received on the KIVO. This includes changes to the wording on sustainable transport and adding in more information about housing issues.</p> <p>Energy policies will be drawn up in conformity with Future Wales.</p>
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<p>Newtown &amp; Llanllwchaiarn Town Council (10)</p>	<p>The existence of conservation areas is commendable, yet it is disheartening that some, like Crescent Street, have become visually unappealing. The structures on Bryn Street and the Longbridge, while structurally sound, exhibit a scruffy appearance. These sites require more regular maintenance to avert potential larger costs in the future. Preserving these areas is essential for Newtown to attract tourists, considering their significance in the town's history and identity, playing a pivotal role in the local tourism industry. Acknowledging the council's stretched resources, there is concern about whether these non-essential yet culturally significant sites will receive the attention they deserve.</p> <p>Given the abundance of older, listed buildings, privately owned properties, conservation areas, and the financial challenges associated with adopting environmentally friendly technology, it would be beneficial to understand Powys County Council's (PCC) strategies for achieving net-zero status. An exploration of whether the planning process needs revaluation to enhance accessibility to eco-friendly technology is warranted.</p> <p>In the design of new developments, it is imperative to consider incorporating green spaces. This not only brings nature closer to residents but also contributes to enhancing mental and physical well-being.</p> <p>Anticipating an aging demographic, there is a growing need for quality assisted accommodation that allows the elderly to maintain a high standard of living while staying close to their families. Providing excellent facilities in such accommodations may incentivise the elderly to transition from their family homes, subsequently releasing these homes</p>	<p>Thank you for the detailed thoughts and comments.</p> <p>Many of these issues will be explored through more detailed topic/background papers or are those which the placemaking agenda already identifies as relevant. The wording of Kl.15 has been revised.</p> <p>Your comments re: tourism and built heritage will be passed to the Service Professional Leads. We will also pass the comment on regarding the net-zero strategy which is being worked on as part of a Powys-wide Climate Project (PSB Well-being).</p> <p>It is agreed that green spaces should be integral to new development wherever possible.</p> <p>The KIVO has been amended to include more detail on specialist housing.</p> <p>Statutory consultation periods are six-weeks which will hopefully give you more time for future feedback. Please refer to the Delivery Agreement (once amended) for consultation timetable.</p> <p>Finally, regarding your point about vagueness, the information in the KIVO was heavily summarised. The</p>
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	<p>to the market for new families. This domino effect can positively impact the housing market.</p> <p>Increased support for tourism from Powys County Council is paramount. Understanding how the county council plans to leverage information from Future Wales to bolster towns like Newtown, considering the critical importance of tourism, is essential. Clarity on the specific measures and support initiatives in place will enhance confidence in the council's commitment to promoting tourism and sustaining the local economy.</p> <p>The timeframe given for the council to review this documentation and offer detailed and constructive feedback is limited and we would welcome further information on the timescales of this project so we can be best prepared to answer further consultation requests.</p> <p>We also note that some of the documentation is quite vague in its information. Often a statement is made but with no background information to offer context.</p>	<p>revisions have added back some more detail but note that the Preferred Strategy will be accompanied by background papers. These will set out more of the detail behind the content of the Plan.</p>
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ADDITIONAL NOTE: A representation was received from Stantec (Representor 21, Received 24.01.24) – relating to a site promotion . However, as the representation was centred on support for a Candidate Site Submission it has not been included in the KIVO consultation comments. A representation of this nature is not considered duly made or relevant to this stage. Note that all candidate sites are being assessed in accordance with the published Candidate Sites Assessment Methodology and more information will be made publicly available in a Register at the Preferred Strategy stage. The site representation will be retained on file for information and considered in due course.