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**LDP Document: 63 Historic Environment SPG**

**RefPoint: 63.**

**439 Newtown & Llanllwchaiarn Town Council**

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439.P3		08/02/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

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*Question*                      *Representation Texts*

**Question:                      Details**

*Representation Text:*     Newtown Town Council, on the whole, support the SPG, and particularly note the priority that has been placed throughout on preserving local feature, character, and distinctiveness. The Town Council are pleased to note that local sources will be taken into consideration on planning issues, in particular the Newtown Town Council Place plan. However, we are suggesting that maybe the wording on Page 16, Section 4.73, line 4 'Taken into account' might be better changed to 'Prioritised'? Finally, given that no other town in Powys has been singled out in the SPG for any criticism of the current character of an area, we would like to request that Page 7, Section 4.21, lines 8 & 9 "Sadly most of the communal courtyards are now divided and historical unity of the area has been compromised" be removed.

*Council Response:* Support is noted.

It is not appropriate to make the change requested by the representor, as judgements made on the priority and weight to be given to individual material considerations are a matter for the decision-maker at the application stage. No changes recommended.

This section of the SPG has been taken from information previously published in the Historic Environment Topic Paper prepared as part of the preparation of the LDP. It is not intended to be a criticism of Newtown, as such, rather it is a reflection on the impact that changes have had on the character of these buildings. This is an important message in the context of this SPG. No changes recommended.

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**5466 Brecknock and Radnorshire Committee of the Cam**

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5466.P51		01/03/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

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*Question Representation Texts*

**Question: Details**

*Representation Text:* . BRB-CPRW thanks Powys Planning for the opportunity to comment. We warmly welcome this SPG which we consider to be thorough and informative. It contains a lot of useful information and source materials which will make this an invaluable reference for a wide range of readers. It was a particular pleasure to read a concise, expert and appreciative account of the historic background to the current Historic Environment and the range of historic assets. We fully agree that Powys has an impressively rich Historic Environment which must be preserved and enhanced through the planning system for future generations.

We note that the purple and black headings system is reversed in the index compared with Archaeology and Drainage & Flooding SPGs, also out for consultation. Purple subheadings appear in the text but are independent of paragraph numbering. We trust that the SPG format will be standardised and the index extended before publication.

We find it unfortunate that large swathes of Powys are empty of Registered Historic Landscapes. We note that 36 areas were published in 1998 and a further 22 in 2001, making 58 in all. Apparently, none have been added since (TAN 24 Annex C).

Powys, excluding the BBNP, makes up 18.5% of the area of Wales and yet (taking the proportions outside the Powys borders into account) contains four (three and two halves) of smallish RHLs. This is only 6% of the total number for Wales. Just as with Special Landscape Areas, this lack of designations serves Powys poorly. Powys Council has repeatedly refused to support designation of SLAs on the grounds that all Powys landscape is of high quality. The result has been that almost none of landscape in the Powys LDP area benefits from adequate planning protection. The historic aspect layer of LANDMAP is mentioned in Section 4, but thereafter principally in advice to refer to the Landscape SPG. This failure to designate makes the commitment to protect local non-designated features of the historic environment all the more important. Locally important features are mentioned in the SPG but not headlined or emphasised. We would like to see this point about under-representation incorporated into the SPG.

We have found no overall discussion of direct and indirect impacts (briefly mentioned 6.23) or of impacts in the historic environment which are not visual or not related to the materials and design of buildings. These might be impacts on biodiversity from emissions, prevention of public enjoyment and appreciation of an asset through noise or odour, harm from pollution etc.

All parties find the concepts of "setting" and "curtilage" difficult. Since these are enshrined in policy, they are liberally scattered through the text. It would be helpful to include a frank, dedicated attempt to explain these (although we know there is a lot of grey-area).

Sections 1 - 4 of the SPG are authoritative and clearly written.

Our comments below are principally about Sections 6 & 7 which would benefit from clearer structuring, simpler sentences, reduction in length and tables. We appreciate that SPG drafting is a challenging task. However, if these sections were more reader-friendly, applicants, the public and decision makers would be better able to find their way about and digest the large volume of requirements and advice. Appropriate revision would make an important contribution to the stated aim (1.4) of "improving the approach towards protecting and enhancing local distinctiveness through preservation and enhancement of the historic environment".

It would make for too long a response to comment on every paragraph but we have picked out a few problem paragraphs. We include some particular examples of language use which are common in Sections 5-7 and which inhibit easy reading and obscure key information. Suggested changes are in italics. We have added some suggestions about restructuring Section 6. In general, the drafting of SPG text should consider which general information the reader needs to know at the outset of a section or subsection, before embarking on pages of discursive paragraphs.

A well-designed flow diagram summary of the application and decision process would also be useful.

5. Local Planning Policy

Could LDP policies go in a simple initial table of Policy, policy type or topic, short summary of implications? Any further comments on Objective 13, SP7 and DM13 could be spelt out in

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more detail? This would be easier to consult and would deal neatly with the bits and bobs 5.6 -5.12

5.4 Penultimate sentence difficult to understand. Suggest "to development.....or significant views" insert "with": "or with significant views"

5.5 last sentence: "give regard": suggest "have regard" or, better, "consider"

Two examples of improving text which could usefully be applied more widely in Sections 5 to 8.

5.6 "Reference is also made to": "such as in relation to", "where the", "relating to", "specifically", "and as part of" are all redundant and interfere with clarity . suggest: "The historic env. and assets are mentioned in other parts of the LDP. Tourism Policy TD1 reasoned justification explains ".....". Tourism Policy TD3, Montgomery canal and Associated Development, refers to..... and the reasoned justification recognises...."

5.9 similarly, "relating to", "relates to", "it is explained in..." "it goes on to explain.....that" "will need to take account of" This para. could be reorganised starting "Policy E5, development of Bronlyss Hospital Site into a Health Park,....", suggest substitute: "Para x.x.x. explains", "should consider" or "must consider"

#### 6. Implementation of Historic Environment Policies

This is the most important section for applicants but is also the most difficult to follow and takes an astonishing 14 pages.

The text needs reducing and ordering so applicants and others can see clearly how planning for the historic environment works and exactly what is required of an application for development.

We suggest that a means must be found in the structure of the SPG to highlight essential general planning information so that it does not have to be repeated in every section and subsection.

Suggest delete most of 6.1 to 6.5 and list briefly what the section does:

- Provides overview of policy implementation for the 3 classes of designated assets: RHL, RHP&Gs, LBs (in that order) and the settings of each,
- Gives specific guidance for the Montgomery Canal
- Assists applicants to incorporate impacts on historic assets into submissions
- Discusses Heritage Impact Assessments
- For each class, describes four stages
  - identifying likely significance impacts
  - designing the proposed development,
  - assessing the impact of the development
  - submitting an application
- Describes how planning decisions take the designated historic assets into account

Say Section 7 addresses non-designated sites.

Then make a clear strong statement that it is essential to consider HE impacts from the very outset, consulting appropriate authorities and qualified experts, thus avoiding peppering the text with irritating repetition about the (very important, we agree) need for early integration of the HE.

Describe the pre-application stage here and say that the various specialist reports which may be required are described in Appx 4.

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Using RHLs as an example, most of this this applies to RHPG and LBs too. The common ground is demonstrated by the many copy-and-paste identical paragraphs.  
 Can't some common step-by-step advice be given? This could be in box tables with 3 "designation" columns and 4 "step" rows. Common advice could go in a row with a single merged column but the columns could divide into three at some points, for example setting out separate registers, advice docs., competent authorities etc. in parallel boxes for each class of designation. General text for Step 2 could be in a single box and then the particular features to take into account for each type of designation in Step 2 could be placed in three parallel boxes .  
 Step 3 also has much common advice  
 Step 4 is virtually all common advice.  
 This may be worthwhile even as a summary guide with reference to fuller information paragraphs.

EXAMPLE

Implementation stageRHLRHP&GLB  
 Implementation general(e.g.) All development proposals:  
 •must consider the impact that the development would have on the historic character of these designations and their settings or curtilages (Policy SP7)  
 •must be designed to complement and enhance the character of the surrounding area and to contribute towards the preservation of local distinctiveness and sense of place (Policy DM 13 .1 & 2) etc.  
 Step 1 general  
 Identify significance(e.g.) Is the Development within or close to a Historic Environment designation?  
 What impact will the development have on views etc.....  
 Step 1 particular  
 Authorities  
 Ref. documents etc.  
 Particular things to considerAuthorities  
 Ref. documents etc.  
 Particular things to considerAuthorities  
 Ref. documents etc.  
 Particular things to consider  
 Step 2 general  
 Design  
 (e.g.) Can the development be sited and designed so that it is appropriate and sensitive to the character of the RHL and its setting?  
 Does the design reflect the locally distinctive character of the RHL, through siting, built form, detailed design, and materials?  
 Step 2 particularList of features to consider for RHLList of features to consider for RHP&GList of features to consider for LBs  
 Etc.Etc.

Returning to the current text:

6.1 sentence 2. "given that these assets have been designated as valued building or areas in respect of these matters" replace with "because these are the characteristics which have determined the designation of these assets"

6.1 & 2 & 3  
 PPW takes precedence over LDP so should come first.

6.5 Muddled statement which needs clarifying:  
 "The process incorporates the requirement for Heritage Impact Statements in connection with applications for listed building consent." Is this saying that LBC applications differ from RHP&G applications because they require an HER while HER is desirable but not obligatory for RHP&G applications? And how do settings of different historic assets fit in? "Three designations covered by this SPG" are mentioned in 6.2 and again here. It is not made clear whether there is an HER process for Registered Landscape Areas.

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RHLs

The RHL section should begin with 6.8. Sentence 1 and add that developers are encouraged to submit a design and access statement or a planning statement explaining how they have addressed issues concerning the Historic Environment.

The next para. should be:

"X.X For Development requiring Env. Imp. Ass.(see Appx 4.) or ASIDOHL2.(see 4.10), these basic steps are not sufficient. Cadw and Cpat should be consulted about the need for detailed assessment."

Reference to 4.10 where ASIDOHL2 explained and Appx 4 where EIA is explained helps here but it would also be useful to put internal references to explanations about official sources, regs, etc., perhaps in brackets, throughout this section .

6.6 & 6.7 should be in Step 1.

6.7 Suggest "It is essential to check the detailed information on the Register for large or complex development but applicants should also ensure that smaller developments will not have harmful impacts."

Step 1.

Too confused and repetitive about "historic character areas"

Best in a series of questions? Or perhaps combined into EXAMPLE Table above?

Very rough example for reducing Step 1 without losing information.

1.Consult Register/map

- Is the proposal within a RHL? Consult.....

-Is it close to a RHL boundary: how close?

-Are there views from within from the RHL?

-Are their views where the development and the RHL are seen together?

2.Is there is any potential impact on the RHL or its setting, consult details of Historic character areas (ref.) which explains .....(refs in Ch 4).

3.Site visit:

-check for characteristics listed by CPAT for the Historic character area

-consult Cadw conservation principles

-identify potential impact on historic characteristics

-identify potential impact on views.

Etc.

6.25.& 6.26 & 6.28 & 6.30 & 6.31: all these are confusing when read together with 6.8. Should draft one definitive statement. Also 6.28 is the first mention of HIR so it comes up as a complete surprise!

6.27 Note following 6.27 should have come somewhere in the very beginning - with 6.1.

6.35 last sentence: "will be refused". Otherwise it is implied that projects with unacceptable impacts may be accepted! This applies for each designation.

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6.61 "curtilage" and "setting" are difficult concepts. Should "setting" have been addressed in Section 5 with SP7?

6.98 does the long list add anything - since any applicant would have to consult the MCP Strategy anyway?

7 Using the HER

Pre-application consultation with CPAT should be headlined at the outset to avoid repetition.

7.2 Sentence 3. "The HER is composed of" or "the HER is...."

8. Monitoring and Review

Best to reproduce exactly what the LDP says about monitoring and monitoring indicators for the Historic environment.

Appendix 4

EIA para 2 does not make sense and has a singular/plural mistake: "in deciding whether EIA is required for Schedule 2 development, the selection criteria set out in Schedule 3 of the EIA regulations refers to...."

ASIDOHL2 para1 "Technical Annex"

Para 2 "As explained above, all applications requiring EIA will be required to carry out the ASIDOHL2 process." For accuracy, suggest: "The ASIDOHL2 process is mandatory for EIA applications with likely impacts on Registered Historic Landscapes

DAS "Where development affecting the historic environment is involved, the DAS must cover the standard aspects expected of a DAS, but it must also address how the proposal relates to its particular special context. Therefore, the DAS must consider the historic environments assets affected by the proposal. A DAS is required to demonstrate the steps taken to appraise the context of the development and how the design of the development takes the context into account."

Suggest: "For any development affecting the Historic Environment, the DAS must demonstrate the steps taken to assess the impact on historic assets and character and show how the project design takes the Historic Environment into account."

Assessment of impact on setting:

"historic or modern viewpoints. Photomontages and maps showing zones of theoretical visibility may assist with this assessment....."

This implies these assessment techniques are specific to "settings" whereas they are applied more generally and should also be mentioned under other headings.

*Council Response:* Support is noted.

The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.

It is not considered to be the role of the SPG to reflect on the representation of Registered Historic Landscapes in the Powys LDP area, which are designated nationally. Other matters raised in relation to designating Special Landscape Areas were addressed at the LDP examination. It is appropriate to cross-refer to the Landscape SPG, which provides detailed guidance on the use of LANDMAP. Further guidance on the historic landscape layer of LANDMAP is explained in Figure 5. No changes recommended.

The approach towards local non-designated features, particularly those recorded on the Historic Environment Record, are sufficiently covered in paras 4.50 to 4.52, and guidance on the use of the HER is provided in section 7 of the SPG. The SPG does not discuss historic assets of special local interest as there is no policy within the LDP relating to these assets. No changes recommended.

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<p>Cadw guidance covers these matters and is referred to as appropriate in the SPG. It is not considered to be necessary to repeat this guidance in the SPG. No changes recommended.</p> <p>Recommend to include further explanation of setting by inserting a new para. following 4.52 relating to setting of historic assets. Para. 4.44 already explains what is meant by curtilage in the context of Listed Buildings. Reference is also made in the SPG to further guidance by Cadw on these matters.</p> <p>This section of the SPG sets out the key relevant LDP policies relating to the historic environment and also mentions other policies that refer to the historic environment. It is considered to be sufficiently clear and is consistent with the way that policies are set out in other SPG. No changes recommended.</p> <p>As explained in para. 6.5 of the SPG, there will be similarities in the general process for all 3 designations, however the details will differ. The suggested table format would appear overly complicated. Recommend to include, at the start of section 6, a figure setting out the common step-by-step process that applies to all 3 designations.</p> <p>Recommend to include a flow diagram summarising the application and decision process at the end of Section 6.</p> <p>Recommend to include a figure which summarises key questions in relation to step 1 for RHL, RHPG and LB.</p> <p>It is not appropriate to confirm that applications will automatically be refused where there are unacceptable impacts to the historic environment. Planning decisions will weigh up material planning considerations relating to the proposal. As para. 6.35 suggests, there will be occasions where unacceptable adverse impacts may be outweighed by other planning matters. No changes recommended.</p> <p>This section summarises the LDP monitoring relevant to this SPG and is considered sufficient. No changes recommended.</p> <p>Reference to photomontages and ZTV reflects Cadw guidance in respect of setting. They are already referred to in para. 6.28 in relation to RHL. This level of information is less likely to be required as part of typical applications affecting LBs and RHPG. However, the need for this information may arise when considering the impact of major or complex developments on the setting, in which case the SPG covers this situation. The need for this type of information as part of EIA or ASIDOHL process will be determined as part of that process. The use of ZTV for general landscape purposes is explained in the Landscape SPG. No changes recommended.</p>									

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**6315 Natural Resources Wales**

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6315.P2		25/02/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

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*Question*                      *Representation Texts*

**Question:                      Details**

*Representation Text:* . Our comments on the Historic Environment SPG reflect past experience of working with Registered Historic Landscapes and a planning appeal for Bryn Blaen Wind Farm near Llanidloes. We would be pleased to provide additional input and clarification on the points raised.

Registered Historic Landscapes (RHL) It would be beneficial to list which of the Registered Historic Landscapes (RHL) within the Powys LDP area have undergone Historic Landscape Characterisation. A web link to this information or direction to CPAT’s website would encourage access to the appropriate information. LANDMAP historic and cultural landscape data sets These two assessments provide information in a format that can help inform Assessment of the Significance of the Impacts of Development on Historic Landscape (ASIDHOL 2).

The approach taken to defining Historic Character Areas by the Archaeological Trusts and LANDMAP has not been consistently applied across Wales. It would be beneficial if the SPG were to acknowledge this anomaly and explain how the two sets of separate baseline evidence can be used.

Similarly, an explanation of what Outstanding and High RHLs and Outstanding, High, Moderate and Low LANDMAP Historic Landscapes tell us about the importance of the historic landscape resource would be useful for making planning decisions. The SPG could better explain what might cause a significant effect on a Registered Historic Landscape to support Strategic Policy SP7. ASIDOHL 2 can be used to assess development effects on the aesthetic appreciation of a historical landscape i.e. to conserve a place perceived to have little or no modern-day intrusions. We are aware that some LPAs have taken this approach to RHLs. We are also aware that wind farms have been argued to be an acceptable addition to a RHL because of no physical disturbance of artefacts. Both ASIDOHL 2 and the statement in paragraph 4.33 predate wind farms on the scale we are seeing today and are set to see as a result of the draft NDF.

We acknowledge that ASIDOHL 2 currently provides very little on assessing the visual change to historic landscapes. The responsibility of revisiting ASIDOHL 2 would fall to CADW. However, in the interim we strongly recommend the SPG provide more definitive guidance to decisions maker and assessors. Paragraph 6.6 All development proposals within Registered Historic Landscapes, or near to these landscapes, will need to consider the impact that the development would have on the historic character of these areas and their settings.

RHLs are being considered in the same way as National Parks, AONBs and Schedule Ancient Monuments by bringing in visual character, qualities, views and status in the landscape. ASIDHOL2 does not assess this. The SPG is unclear as to what form of assessment needs to be undertaken to assist decisions here. It may take the form of an Historic Landscape and Visual Impact Assessment which responds to the historic landscape baseline. Clarification on this matter would be beneficial. Paragraph 6.21 Proposals should reflect the locally distinctive character of the RHL

We advise that the following elements are added to those listed in paragraph 6.21:

- Traditional materials used for doorways, paths, drives, thresholds of drives and courtyards (i.e. tiles, brick, flag stones, stone setts, stone kerbs, cobbles, gravel)
- Use of colour that integrates well with the prevailing town/open countryside character or reflects historical use

We would also advise the following change:

- Key (delete Prominent) views to, from and across the area.

*Council Response:* Noted.

CPAT has confirmed that all Registered Historic Landscapes have been characterised. A link to CPAT’s website on historic landscape characterisation is already included in the SPG at



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paras 4.42 and 6.12. No changes recommended.

The Good Practice Guidance explains that the characterisation work is compatible with the historic landscape layer of LANDMAP. Matters relating to consistency between these data sets should be resolved at a national level and cannot be addressed by this SPG. Recommended additional text in para. 6.15 explaining the use of the historic characterisation work and LANDMAP. No changes recommended.

Recommend additional text in new paras. 6.20 and 6.21 to explain the national importance and high value of RHLs (which is the same whether on part 1 or part 2 of the register) and LANDMAP evaluations, and to refer to guidance within the Landscape SPG on the use of LANDMAP.

The significance of effects are considered on a case by case basis and therefore it would not be appropriate for the SPG to attempt to define this. The process set out in the SPG should help to identify effects that may be significant. No changes recommended.

This appears to be a general comment on different approaches being used towards assessing the impact on historic landscape. The Bryn Blaen Inspector considered the impact on views of the RHL and on the key characteristics of the RHL. The guidance in the SPG requires consideration of the impact on views and on characteristics of the RHL. No changes recommended.

This comment relates to concerns about the current ASIDOHL 2 guidance and recognises that Cadw would be responsible for revising this nationally. It would not be appropriate to address this at the local level in this SPG. No changes recommended.

Appendix 4 of the SPG explains the different types of assessments involved. In respect of EIA development, Cadw will advise on the assessment requirements. In other cases, information requirements will be agreed at pre-application stage. Landscape and Visual Impact Assessment, as part of an EIA or in connection with major or wind turbine developments, or informal assessment, will include information on visual and landscape impacts relevant to RHLs. Further guidance on LVIA is found in the Landscape SPG. No changes recommended.

Recommend inserting additional elements into the list in para. 6.21.

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**6395 Canal and River Trust**

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Document:Historic Environment SPG

*Question*                      *Representation Texts*

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*Representation Text:*    Glandwr Cymru (the Canal & River Trust in Wales) supports the production of this Historic Environment SPG and we welcome the references to the Montgomery Canal and future/continued restoration of the waterway (for example at para 4.26-4.27 pg9).

Paragraph 6.100 sets out key design considerations for development adjacent to the Montgomery Canal we support the thrust of the these but have the following suggested additions:  
 -"improve access along and across the canal corridor where appropriate"  
 -"enhance important views outward from the canal corridor;  
 -"enhance recreational opportunities of the waterway by providing a waterside pedestrian and cycling route that is accessible to all and connects to other key pedestrian and cycling routes in the local area, where appropriate"  
 -"ensure the structural integrity of the canal corridor is not harmed"  
 It is unclear if these considerations are also intended to apply to the parts of the former canal which have not yet been restored. We would welcome this being clarified in the text.

We welcome the reference at 6.101 in terms of pre-application engagement with the Canal & River Trust.

A general comment, there are numerous references to the Canal & River Trust within the document. We welcome this but there are also numerous versions of our name given with 's' add to River and with the use of 'and' instead of the ampersand (&). Please can all references to Trust be made consistent and read 'Canal & River Trust'

*Council Response:* Support is noted.

Recommend inserting additional considerations into para. 6.100. These considerations are intended to apply to unrestored sections of the canal to reflect the scope of policy TD3. Recommend additional text is inserted in para. 6.100 to clarify this.

Recommend to amend references to the Canal & River Trust throughout the document for consistency.

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