

Place Plan SGP Reps and Draft Responses

by: Representation No

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439 Newtown & Llanllwchaearn Town Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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439.P4		10/03/2021	<input type="checkbox"/>	E	S	W	M		Summary: Support as the SPG is the NLTC's own document
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Question *Representation Texts*

Question: **Details**

Representation Text: . A resolution made at the March meeting of the Economy and Environment Committee is as follows:

“The committee resolves that as this Powys LDP Draft SPG public consultation on the draft Newtown and Llanllwchaearn Place Plan is NLTC's own consultation, support is implicit.”

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1481 The Coal Authority

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
1481.P2		25/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: No specific comment to make

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Question *Representation Texts*

Question: Details

Representation Text: . Having reviewed your document, I confirm that we have no specific comments to make on it.

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1552 Douglas Hughes Architects Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P29		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan with suggestions for some changes/amendments including concerns on the suitability of some of the Plan's suggested development sites

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . Response Following review of plan by Richard Lewis and Doug Hughes

Firstly we wanted to commend the Town Council for their work on this, it is a comprehensive document and an important part of securing the kind of development we all want in Newtown.

Policy 1.1

We are in agreement with the aspirations in this section.

Policy 1.2

We have some concerns with the quoting of the Draft NDF which states that '44% of the additional homes needed should be affordable homes'. We suggest that this figure is not included because it conflicts with the figures provided by Powys County Council and once this SPG is adopted could be used by planning officers as a material consideration. Of course provision of sufficient affordable homes is crucial, but the county already has very low levels of delivery of open market housing which could be harmed further.

Looking at the proposed housing sites, we agree that the Treowen site is of great importance and every effort should be made to achieve an exemplar development here in terms of design and sustainability. However we don't think the other sites referred to for future development are suitable for a number of reasons.

Hendidley – The site is very steep and suffers from poor access onto Milford Road

Dolfor Road – This site is incredibly steep and would be very difficult to develop fully, it may provide some extension to the existing allocated site, but not whole of the hatched area on the map.

Llanllwchaiarn – Very steep site, poor access, poor highways infrastructure.

We think that current sites with permission should be included such as the remainder of the site at the top of Bryn Lane and the site alongside Glandulas Caravan Park. There may be others.

In terms of other sites to bring in, we'd suggest the opposite side of the road to Rock Wood in Llanllwchaiarn, land around the Gro and possibly Wern Ddu Lane.

A design brief for Treowen was referred to but wasn't included.

- In terms of loss of community facilities some flexibility within this would be important to change to other uses or provided uses which could make these sustainable in the long term.
- Section 1.4 is not clear on where the employment land is proposed.

Policy 1.3

Some extra detail on what constitutes a community facility and how it's demand is calculated would be useful, but the safeguarding is supported. Flexibility to change to other uses which support the community would be good.

Policy 1.4

The need for additional employment land is agreed. We think proposals of where to place this should be made, with contingencies in place if the current sites cannot expand. For example could the Golf Club be relocated to free up vital land? What is the future of Fronlas Farm? That site could allow expansion at Mochdre. A long term plan with public sector involvement and

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support is required.

Policy 1.5

The new health hub is strongly supported. The involvement of the local community and in particular the 2 schools should be considered carefully though.

Policy 1.6

The Street Scene design is a great idea, the creation of a more harmonious and cohesive design for the whole town is very important. Previous piecemeal improvements lead to a lack of overall identity. We'd strongly suggest that a professional landscape designer is employed to undertake this. The work that Lingard Styles have done around Newtown over the last 30 years is exemplary.

Policy 2.1

We support the aspirations on S106 agreements. We suggest that an overall plan of requirements for the town could be drawn up so that all developments can contribute towards them rather than a piecemeal approach development by development.

Policy 2.2

Could improvements to active travel mean more flexible uses within under utilised car parks? Events space in Dolerw Car Park, can still be used as car park for majority of the time, but some small alterations to make easier to adapt?

Adoption of car share and in particular car free zones is supported, but requires buy in from the Local Authority Highways department to be successful.

Policy 2.3

In particular policy CCa, we think this needs to be reworded to be proportional to the size of the development and shouldn't hinder development unduly.

Policy 3.2

We feel policy CA1 should be a short term goal, the need is clear now.

Next LDP:

Suggest flexible permitted development rights for the town centre to change uses should be pursued. We have raised this with Powys CC, who have pointed to the new Future Wales document. Brecon Beacons NPA have already announced a policy on this. We feel it is vital in assisting with the post Covid recovery.

As previously mentioned we think that the proposed housing sites (apart from Treowen) will be very difficult to develop.

We would like to conclude by saying this is a very well written document and a great positive for the town.

Council Response: Noted thank you. The document will be amended to reflect the publication of Future Wales in February 2021 and updated PPW11. It is agreed that the mention of the national figure of Affordable Housing need may be confusing and reference will be made instead to the LDP target for the Powys Severn Valley Sub-market Housing Area.

In terms of site selection/proposals, the Place Plan contains commentary on a range of sites from those which already have planning permission to those already "zoned" for housing to those that are only suggestions for the next Local Development Plan.

Whilst it would not be appropriate for the Place Plan to include wholly unrealistic sites, it is important that the Plan reflects local community views (as obtained from engagement exercises). The Council have worked with the Town Council to ensure that wholly unsuitable sites have been sifted from consideration. Those that are mentioned in the Plan have either already been determined as suitable or potentially suitable subject to detailed design (ie they have planning permission or they are allocated) or, where this is not the case, sites included should be only be viewed as "long-listed". Any such sites will be subject to further scrutiny as part of the next LDP.

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The Place Plan, being supplementary guidance, cannot introduce new sites unless they accord with LDP policy. At this stage your suggestions for possible new sites would fall into the "long-list" category but will now be recorded in the supporting evidence for future attention. Note that potential sites mentioned in the Place Plan will not automatically be considered for allocation by PCC - the SPG is subsidiary to the LDP - the County Council will expect to receive a detailed site submission at the appropriate stage of the development plan review process for further consideration. At this early stage we can point out that at least 50% of the Pool Road site (mentioned in your rep as land at The Gro) could well be constrained by flooding issues and hence be contrary to national policy in TAN15.

For completeness, the Town Council agree to add the sites near to "Glandulas Caravan Site" to the "what's been happening recently section" in chapter 1.2.. Generally other large sites are already captured in the LDP - the Place Plan references LDP Policy H2 - and, where the Place Plan is unable to influence their future, it had been considered better to direct people to the LDP rather than making the SPG repetitive. The Bryn Lane site you mention being one example of a site already shown in the LDP as a Housing Commitment where planning has already been determined.

Your comments on the need for employment land are noted. This will be reviewed as an over-arching Development Plan matter and will be considered at the LDP Review stage. We would welcome your further engagement on this topic at the appropriate time. However, we can advise that current studies (2020) have highlighted the importance of Employment Land allocation P48 EA1 (Llanidloes Road, Newtown) where strategic intervention is recommended.

We welcome your overall support for the Place Plan and the involvement already undertaken and can advise that your comments have resulted in wording changes in Policy HF-b and Policy CC-a and Projects OS3 and T2. Also note the revised project TC1 and the commitment to bring forward Project CA1. Thank you.

Please note that change of use/increased flexibility on permitted development etc (especially in relation to Covid-19 recovery) are issues not readily addressed at the Place Plan/SPG level. Higher tier legislation/policy will impact on lower tier plans. The DCFW consultation response included a relevant link to placemaking resources where an up to date paper "Places for Life II" is available. Welsh Government <https://gov.wales/planning-policy-covid-19-recovery> - "Building Better Places" is also relevant to planning post-pandemic.

Place Plan SGP Reps and Draft Responses

Powys County Council Local Development Plan

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3076 Design Commission for Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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3076.P1		03/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Emphasise the importance of Design Quality and Place Making
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Question *Representation Texts*

Question: **Details**

Representation Text: . It is important that design quality, and successful integration of placemaking are emphasised in any new proposals.

The Placemaking Wales guide could be a useful resource. It can be found here: <http://dcfw.org/placemaking/resources/>

Council Response: Thank you for your comments which are noted. The document will be amended to include the placemaking link.

We advise that high quality design is included within Place Plan policy HF-a and design quality is clearly identified in the over-arching Powys LDP at Policy DM13 which is further supported by an adopted Residential Design SPG which references Placemaking .

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4369 The Theatres Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4369.P1		04/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Supportive of the CF policies, suggests mapping of theatre and cinema to help protect these assets

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Question *Representation Texts***Question: Details**

Representation Text: . Theatres Trust is supportive of this Place Plan and in particular the strong emphasis afforded to the protection and promotion of community facilities through the CF policies. We welcome that this includes theatres, as these provide access to cultural activities for local people and enable participation and engagement. This helps reduce loneliness and isolation and improves social and cultural wellbeing. Cultural facilities, of which there are a number in the area, also help bring people into the town which is increasingly important as retail and town centres come under increasing change.

We would note the accompanying map fails to identify the Powys Theatre or the Regent Cinema. We would suggest that the map is amended before the plan is progressed to ensure these valued facilities are recognised and protected

Council Response: Thank you for your comments. We agree with the proposed mapping changes to show the theatre and the cinema as cultural venues. The cinema will also be added (to accompany photo) to the list of key attractions in the introductory text at 3.2.

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4640 Powys Ramblers

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4640.P1		02/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan, comments on Rights of Way Content and increasing the References to PROW

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Question *Representation Texts***Question: Details**

Representation Text: . We very much welcome the development of this plan and our comments are set out below under the various Headings within the document.

Character and Heritage

Rights of way are part of the heritage of Newtown. They have been used for generations and tell a story about the history of the area. It would be helpful if this could be made clearer in this chapter and mentioned specifically in one of the policies.

We are very much in support of project CH3 to seek funding for the repair and renewal Dolerw bridge.

Housing and future development

On policy HFa it would help to demonstrate the importance of walking routes when considering housing developments, if this policy could explicitly refer to footpaths and taking opportunities to link pedestrian routes on estates to the existing rights of way network.

It would also help to be clear in the policy that any changes of rights of way required by housing developments will require, at least, the same length of path to be re-provided.

Community facilities

On Policy CFa can it be made clear please that rights of way are considered to be community facilities and, as such, any proposals that will result in their loss will be strongly resisted?

Business, learning and employment

We are very much in support of project HW5 - seeking funding for a project to construct an accessible path up and around Trehafren Hill in conjunction with the already built cycle track.

A safe and tidy town

On project ST1 can specific reference be made to rights of way please as they are often in a much worse condition than normal pedestrian routes? That is also the case with some of the furniture on rights of way, e.g. stiles, bridges etc.

Green Newtown

On Policy OSa which refers to the loss of public open space arising from development being resisted, can this be expanded to specifically mention rights of way as well please?

We are very much in support of project OS2 to enhance the use of the river and open spaces. Could this be expanded to refer to rights of way please?

Active travel and transport

On Policies AT a & b about securing pedestrian and cycle ways in new developments, can specific reference to improving existing rights of way be included here as well please? Can consideration also be given please to pursuing new routes to be made rights of way?

On project AT2 can it be made clear please that this audit should include all rights of way? It would also be useful to build in further audits in future years to identify and then resolve any future maintenance issues.

We are very much in support of projects AT4, AT7, AT8, AT9, AT10 and AT11 about improving and protecting footpaths and bridleways.

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Tourism, culture and attractions

On policy Ta in the list of welcome tourist initiatives, can reference be made please to projects which aim to encourage tourists to take advantage of the rights of way in the area?

General

It will be apparent from the comments above that we think there should be more reference to rights of way in the Plan. We would be happy to offer further advice as the Plan developed so please keep in touch with us on this matter.

Council Response: Thank you for your comments. We understand the importance of protecting and improving rights of way. The Local Development Plan (to which the Place Plan is subsidiary) contains Policies SP7(3), DM13(9) and Transport policy T1 to this effect. We will however pass a copy of your comments to the Council's PROW team and the Council's Active Travel Officer to alert them to your views.

The Ramblers support to various policies/projects in the Place Plan is appreciated. In response to your proposed alterations surrounding more mention of public rights of way, additions have been made to the Active Travel Key Facts section, the supporting evidence section (Character and Heritage), to Policy HF-a, Project ST1, Policy OS-a and Project OS2. We also include the Powys Ramblers as a Suggested Collaborator for Project AT3 as well as on Projects AT4, AT7, AT8, AT9, AT10 and AT11. With these additions and given the statutory protection offered to PROW we do not consider other changes to be necessary.

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6315 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6315.P3		19/03/2021	<input type="checkbox"/>		C	W	M		Summary: Raising Awareness and providing info on a number of topics for inclusion including SoNaRR 2020, SMNR and Area Statement work, Open Spaces, Green Infrastructure, Pollinators and SUDS

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*Question Representation Texts***Question: Details***Representation Text:* . Newtown & Llanllwchaiarn Draft Place Plan V 4.1 January 2021

General observations

The draft document considers the environmental implications of plans and often references the importance of the environment, biodiversity and their importance for the wellbeing people and their townscapes.

We welcome the commitments made in the section "A world changed by Covid-19" on page 11 of the document, where the Welsh Government are quoted for the 'protection and enhancement of natural resources and investment in active travel'. We are pleased that the opportunity is being taken to consider the importance of the environment.

Page 15 of the document has a table of 'Links to other plans' relevant to National Planning & Wellbeing Plans. Reference is made to Planning Policy Wales (Edition 10). On the 4th of February 2021, Edition 11 of Planning Policy Wales has been made available.

Sustainable Management of Natural Resources (SMNR)

The Place Plan goes a long way to support the aims and objectives of SMNR which align with NRW's own SMNR aims including:

- Safeguarded natural resources
- Resilient ecosystems
- A healthy environment for people
- A regenerative economy

Whilst the plan is indirectly seeking to achieve some of the same objectives and aims of SMNR, no direct reference or mention of SMNR has been given. We suggest it may be relevant to include or make reference to NRW's introduction to Sustainable Management of Natural Resources document in this Place Plan. As quoted in this document, 'the Environment (Wales) Act and the Well-being of Future Generations (Wales) Act together create modern legislation for managing Wales' natural resources and to improve the social, economic, environmental and cultural well-being of Wales.'

State of Natural Resources Report (SoNaRR, 2020)

NRW has recently published the second edition initial report of the State of Natural Resources Report and has just published the further evidence chapters. We have also released some related evidence on the Wales Environmental Information Portal. The report looks towards taking a greener pathway out of the global Covid-19 pandemic, and to seize the opportunity to re-imagine how we use our natural assets to address the dual threats from the climate and nature emergencies. We would support your Authority referencing any relevant headline messages found in SoNaRR 2020.

Area Statements

We notice the Plan does not appear to make any connections or reference to the Mid Wales Area Statement.

This plan provides an opportunity to create important links with themes from the Mid Wales Area Statement and WG's Nature Recovery Action Plan 2020. Recognition of such links would potentially benefit any funding applications to NRW / WG for projects in the Newtown area. The Wales Environmental Information Portal which has been developed alongside the Area Statements includes multiple spatial datasets that can be used in Place Plans and development management alike as evidence to inform decision making. Among others, ecosystem resilience and Welsh Information for Nature Based Solutions (WINS) and nitrogen sensitive air quality indicators are all available for use.

We are supportive of the place plans content aligning with the guiding principles of SMNR which align with NRW's Mid Wales Area Statement. The Area Statements key guiding principles are:

- Improving biodiversity – responding to the nature emergency

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- Sustainable land, water and air
 - Reconnecting people and places – improving health, well-being and the economy
 - Forest resources – managing timber resources effectively
 - Climate emergency – adaptation and mitigation across four themes
- Not all these themes will be relevant to the Place Plan, but links are provided above for ease of reference.
We have provided more detailed advice on relevant sections of the Place Plan below.

Green Infrastructure

Proposal CH-6 page 39: This is particularly welcome and the final Place Plan could usefully reference both The Welsh Government's Priority Action number 5 from their Woodlands for Wales Action Plan to "Deliver increased and safeguard existing tree cover in towns and cities and support sustainable urban tree management", and the Future Generations Commissioner's Manifesto for the Future recommendation 11 for a commitment to achieving 20% tree canopy cover in every town and city in Wales by 2030. NRW maintains a data set of urban tree canopy cover which will be helpful in this context (and will shortly be publicly available via the Lle data portal).

Section 1.2 Housing & Future Development (Pg. 40)

We welcome suggestions on housing sustainability. However, this section does not mention green space, despite the symbol for the "Sustainable and Productive Environment" objective appearing at the top of the page. The Plan could usefully reference the Welsh Government's Statutory national standards for sustainable drainage systems, with which all new development and redevelopment must comply. These require all SUDS to deliver biodiversity and amenity benefits, which should contribute to the Place Plan's ambitions to ensure residents enjoy a sustainable and productive environment.

We recognise the important role that the requirements of the implementation of Sustainable drainage systems (SUDS) as part of new developments is as a key opportunity to create multifunctional greenspace. It is possible to retro-fit SUDS to existing development within the existing streetscape such as which has been done in the 'Greener Grangetown' project in Cardiff. We would welcome proposals of this nature.

Development must consider the risk of flooding to proposed sites in accordance with the Welsh Government's Technical Advice Note 15: Development and Flood Risk (July 2004) which provides guidance on managing development and the risk of flooding, so to achieve sustainable development.

Section 2.1 Open Spaces

NRW welcome the prominence of open space issues in the Place Plan. We also note that Technical Advice Note (TAN) 16: Sport, Recreation and Open Space (2009) recommends the Accessible Natural Green Space standards (ANGs, Para. 2.18) alongside Fields in Trust standards (Paras. 2.9-2.11 and Annex C) for access to sports fields and play provision. We suggest that prioritisation of works to improve green space (Proposal OS3) could be based on those areas of the town where green space provision does not meet those standards. The toolkit can be viewed here.

Proposals OS1, OS2 and OS3 relate to the review and provision of green space and NRW could note that the requirements for green space provision and enhancement could be assessed against the Green Flag Award standards. The Green Flag and Green Flag Community Awards are supported by the Welsh Government and provide the only internationally recognised standards for the quality management of publicly accessible open space. Research has shown that if green space is poorly managed then it deters public use and is rendered functionally inaccessible. It may still appear on a map, but its delivery of the full range of ecosystem services is considerably reduced.

NRW maintains a data set of all urban green space in Wales which is available for use by all members of the Ordnance Survey's Public Sector Geospatial Agreement (PSGA). When combined with socio-economic data sets, for example, it can be used to suggest where investments in green space may bring the greatest benefit to the most deprived areas.

Section 2.2 Active Travel and Transport

We welcome the active travel and transport policies and suggested projects/actions identified from your public consultation exercises and the idea to develop the public footpath/ cycle network across the town. We recommend that the plan references the Powys County Council Rights of Way Improvement Plan (RoWIP) 2018-2028. There may be opportunities to connect the community's aspirations with the strategy set out in the RoWIP.

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Section 2.3 Climate Change and Biodiversity

We welcome the clear reference to and definition of green infrastructure on page 78.

NRW support Proposal CC3 and reference our guide to managing the grounds of public buildings for pollinators as a source of advice which is helpful when managing the grounds of most buildings. The guide and a sample management plan can be downloaded from the following link [Natural Resources Wales / Love pollinators](#). We also suggest a commitment for the plan to achieve Welsh Government "Bee Friendly" status for the area as an indicator of progress. NRW also recommend that the Place Plan adopts an ambition to achieve 20% urban tree canopy cover as referenced in the comments on CH-6 above.

Section 3.1 Town Centre Experience

We welcome Proposal TC4, referring to the need for increased urban tree canopy cover (see comments on CH-6 above) and noting the increasing evidence from across the world that greener shopping districts encourage people to spend more time in the districts. In this context we note the opportunity to design flower beds and tree pits as SUDS to reduce the impact of surface water flooding thereby making the area more attractive to shoppers.

The Next Local Development Plan

We welcome the intention to submit further green spaces to Powys County Council for consideration as part of the next open space assessment, and we recommend the use of NRW's greenspace toolkit, Green Infrastructure Data Set (which may have to be done in conjunction with a PSGA member) and the Green Flag Award standard to prioritise the green spaces which are to be proposed.

Other Matters

We have provided comments that relate to the functions of NRW that we can within our expertise provide advice on. We have not provided comments on other matters such as that may be of environmental concern because they are informed by the Local Authority or other public bodies.

We advise that a collaborative approach is maintained and implemented to support your Place Plan and that the group should make themselves aware of any permits/ consents/ licences relevant to future development proposals. Please refer to our website for further details.

Council Response: Thank you for your detailed response. The Place Plan has been reviewed to take account of your representation and additional/updated text and relevant website links have now been inserted at the:

"links to other plans" section;

the Climate change and Biodiversity section - including adding SNMR and updating the What's Been Happening Recently section to include SoNaRR 2020 and the Mid Wales Area Statement;

PPW10 updated to PPW11;

Further mention of tree cover in the intro section to Character and Heritage plus including the target of 20% in Project CH6.

Your information on bees has now been included in Projects CC3 and CC5.

Open Spaces wording has been added to Project OS3 and new Project OS9 considers the Green Flag Award.

The NRW Greenspace toolkit, Green Infrastructure Data Set and the Green Flag Award standards are now referenced in Project OS1.

The RoWIP will be referenced in the Active Travel Section. Please be advised that we received associated comments from both the Powys Ramblers and the Local Access Forum. We will be sending on their comments, together with your suggestion about more integrated working to our (PCC) PROW department.

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Powys County Council Local Development Plan

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As SuDS are considered within the over-arching Local Development Plan framework (see Policy DM6 LDP) and are subject to their own legislation and process as part of any development proposal, it is not considered appropriate to detail these to any extent in the Place Plan. Note however that sustainable land drainage is included in Policy CC-d as is TAN15. It is agreed that Project TC4 can be updated to include creating SuDS.

Your comprehensive and up to date response to our SPG consultation is appreciated. We will share your comments within the Council's wider planning policy team to raise awareness as obviously many of these policy objectives are cross-cutting and will need to be taken into account in other policy work alongside their connection to the Newtown Place Plan SPG.

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6421 Natural England

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6421.P1		09/03/2021	<input type="checkbox"/>		C	W	M		Summary: Drawing attention to the River Severn and catchment links to the Severn Estuary SAC

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Question *Representation Texts***Question: Details**

Representation Text: . The River Severn runs through Newtown and Llanllwchaiarn and is hydrologically linked to the Severn Estuary Special Area of Conservation (SAC)- weblink provided - and Ramsar site. Together these sites are designated in respect of the following migratory fish species: Atlantic salmon, Sea trout, Allis shad, Twaite shad, Sea lamprey, River lamprey and European eel. Natural England has become concerned about the impact of upstream development proposals on migratory fish species designated as part of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site, which spend part of their life cycle in the wider Severn hydrological catchment.

The recent judgement (Case C-461/17 Holohan v An Bord Pleanála 7/11/18) highlighted the importance of consideration, as part of EIA and HRA, of potential implications for habitat types and species outside the boundaries of European designated sites, those implications being liable to affect the conservation objectives of the site. As the Plan falls within the hydrological catchment of the Severn Estuary SAC/RAMSAR, we would advise you consider potential impacts on these sites from the proposed plan.

As part of ongoing dialogue with neighbouring planning authorities it has been established that, subject to physical obstacles to passage, these species may be found throughout the Severn hydrological catchment. The Severn Estuary SAC's conservation objectives (weblink) include a requirement to both maintain and restore natural habitats and species of European Union interest at favourable conservation status. This Place Plan provides an opportunity to remove any barriers to fish migration and to enhance the river and riparian habitat through creation and restoration, ensuring good water quality and enabling people to enjoy and connect with nature. The Unlocking the Severn (weblink) project is working to restore the Severn to enable fish to move within the river and to increase people's engagement, and the Plan maybe an opportunity to work with this project. Further information on some of their work can be found here (weblink).

Council Response: Thank you for your comments. Project CC3 will be amended to reflect your representation and encourage integration with the Unlocking the Severn project.

Policy CC-f will be amended to add reference to the importance of protecting the Severn Estuary SAC including seeking schemes that remove barriers to fish migration within the River Severn and which enhance the river and riparian habitat.

Given the concerns you raise the Council's Ecologist has been asked to review the Draft Place Plan. It is considered that HRA screening is most appropriate at the more detailed project (planning application or pre-application) level. However, attention will be drawn to the over-arching LDP policy (Policy DM2 The Natural Environment is already referenced) by including additional wording in the introduction section to highlight the relevance of both SACs and further raise awareness of need to conduct HRA to ensure that development does not have adverse effect.

by: Representation No

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6992 Powys County Council (Cllr Rowlands)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6992.P1		19/02/2021	<input type="checkbox"/>		C	W	M		Summary: Welcomes the Plan, comments on recovery post Covid-19 including support for mental health especially for children and young people

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . Due to the pandemic and the huge impact this will have on everyone particularly children and young peoples especially impacting mental health in particular anxiety etc. Is it worth having something in the plan on how this will help in this particular area? In the report it states that the Impact of Covid-19 Due to Covid-19 restrictions, the majority of community facilities, were forced to close their doors. The government has recently announced a £26 million support package for the whole of Wales, intended to provide grants of £10,000 to eligible small charities within retail, leisure and hospitality.

I know this would involve a wide range of services but I think it would be reassuring for everyone in the community that the town council are potentially making an effort to help with this. Or at least working alongside other services. Just a thought.

Council Response: Thank you for your comments. Wording changes have been made (Impact of Covid section) to further recognise the impact of the pandemic on health and well being including on mental health. Please also note the relevance of Project HW6.

by: Representation No

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7024 Davies, Norman

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7024.P1		28/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: General support but disagrees with Active Travel section as currently worded

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . Overall fine except for the Active Travel section.

My particular comments relate to the section on Active Travel – the overall policies Ata and ATb I do not agree with.

Basically, the Council should be seeing active travel as walking (most important) and walking to/from public transport. Too much of the policy (and subsequent expenditure) relates to cycling which is a very minority interest in a rural area which is very hilly. The current footpaths are not well maintained (no doubt understandably given financial restraints). Thus, the emphasis should be taken away from cycling – also note restrictions on private vehicle use which will result from the pro-cycling lanes/cycling policy and potentially block all active travel ideas.

The emphasis should be on a system of well-lit well-maintained footpaths between key housing areas and the town centre, and to/from rail and bus station. Cycles are currently a real menace on the pavements of Newtown and cycles/pedestrians simply do not mix

Council Response: Thank you for your comments. Whilst we understand your views, it is important to realise that the Active Travel Act places equal emphasis on walking and cycling as modes of sustainable travel. We will pass a copy of your comments to the Council's Active Travel Officer. Active Travel is designed to encourage people to move away from the car for purposeful journeys. It does not displace the need for footpaths and other public routes to be upkept and made suitable for safe and easy use. We will ensure that our Highways department are notified of your concerns regards cyclists using the pavements and causing nuisance and of the general problem you experience in terms of footpaths being poorly maintained. Note also that the Town Council are working on an audit - Project ST1, AT1 and AT2 are relevant.

by: Representation No

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7105 Ryan-Ridout, Ms Carole

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7105.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Views and Suggestions on the Historic Environment, Regeneration and Tourism Issues

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . Historic Character – Comments Made Previously- more comments in bold (PCC OFFICER NOTE: comments made to the NLTC at earlier stages not at SPG stage). I have been giving more thought to 'character areas and design' especially after the conversation I had with one of the consultants after the last event who echoed my thoughts on the lack of articulation in the town (its rather disjointed nature). This is due of course to two major events in the 1960s that disrupted the medieval grid iron plan conceived by its founder.(I am a former Principle Planning Officer and Head of Historic Environment in an adjacent Authority and worked with a number of similar historic towns).

1)The first of these was the demolition of Pryce's mansion, a magnificent timber framed manor house and the utilisation of its country park as a bus station and gigantic carpark etc. 2)The second was the demolition of almost all the industrial terraced housing leading down to the river. I dealt with both in my presentation to the Civic Society and you have this document. BOLD 1)Although there is some mention of the former country park and the need for more greening* in the plan it need more careful thought. Recently a monstrously large block of flats has been built fronting onto Back Lane which is exactly what would militate against trying to reclaim this former magnificent country park. END BOLD

*Dealing with the first, more greening and tree planting is needed to soften the large areas of tarmac in and around the bus station and car park, so that something of the character of the country park could be returned. (What a tourist destination this could have been!). BOLD But this should only be the beginning of reclaiming this country park for locals and visitors (tourism). END BOLD

2)With regard to the second, the tree planting done in the medieval shut/alley leading down to St Mary's has been successful and softens the effect of the loss of character of this 'shut/alley/ginnet' but more green spaces are needed around the very large complex of flats that replaced the housing in the area and which now over dominates it and where a rather dead island structure is placed.

I may have missed it but there does not appear to be any mention of dealing with this area. This would soften the impact of this 1990s development. In addition this could be carried into Severn Street, to link this street with what remains of Severn Square (again badly affected by previous demolitions). BOLD Severn Street and Severn Square would make an ideal zone for street cafe culture, but again a grant scheme for which funding would need to be sought, would need to be in operation to encourage would be cafe vendors. It would ensure that the derelict shop would prove viable. One building already has a glass awning and possibly more could adopt this approach to cope with the uncertain climate. END BOLD This street may eventually become almost totally residential, as there are already empty shops and shops with limited opening although an emphasis on cafe culture could be an alternative option . Attention to the shuts leading into Broad Street is also needed. Floorscape and walling material are crucial to their appearance and both have suffered in the post war period, but small craft enterprises which already exist should continue to be encouraged and more could also benefit these areas. BOLD There is no mention of doing this. These shuts are an important feature of the town as they lead down to the river. The corresponding features/lanes on the other side of Broad Street are even more bleak with blank walls of rebuilds forming the sides of the street. Something to break up these blank walls is urgently needed. END BOLD

*Trees are of course a problem, particularly at certain times of year (Autumn)and their root systems can be disruptive. The type of greening needs careful thought. BOLD It is suggested that trees be put in large planters, but the wooden planters for flowerbeds that have been put in Broad Street currently are not particularly welcome. They give the street a disjointed appearance, take up valuable car parking spaces, and will be major maintenance issue in the future. Broad Street already has a green setting by virtue of the hills that can be viewed at either end of the street and which are a major asset. END BOLD.

REMAINDER OF TEXT IN BOLD (I.E. NEW COMMENTS):

The need to stimulate the repair of Penygloddfa area is beyond question but no means of suggesting how this is to be achieved is put forward. What is needed is a grant aided scheme for basic repair, similar to the town schemes of old, analogous to the Heritage Actions Zones in England. Without this existing landlords, largely of the social housing variety will continue to tenant buildings into they fall into total disrepair and then hope to gain a cleared site for redevelopment. Sources of funding should now be sought from the Welsh Assembly.

The Crescent Buildings need to be considered as a separate area zoned for special repair treatment. This is a unique feature of the town, modelled on similar buildings in Regency

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7105.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Views and Suggestions on the Historic Environment, Regeneration and Tourism Issues

Cheltenham, and again social housing. Whilst not decrying the use, landlords may similarly treat them as stated. It cannot be over emphasised how important they are architecturally, despite the rash of illegal plastic windows in these listed buildings, or how important they are as a picturesque enclosure to one end of Broad Street.

Key to reinstating the much needed character and economy of Newtown is the need to find a new use for the listed empty buildings, St Davids Church being the most in need, followed by Bethel Chapel, United Reform Church (is this the derelict chapel with holes in the roof in which case another church on the corner of Park Street needs to be included), The Grapes in Commercial Street, and the Flannel Factory in Bryn Street. No 2 Commercial Street was on this list but the ugly green board has been replaced by illegal plastic windows, with an unfortunate configuration. It is pious to hope that writing to owners of empty buildings will achieve anything other than silence. They are going to be all too aware that they are sitting on plots which if cleared would be ripe for redevelopment. The former English Heritage published 'Stopping the Rot' a manual to guide local authorities on which legislation to use to encourage sale or repair. (CADW have not produced a similar document presumably because it would be repetition). Any competent person in an Authority can use this document to devise a carrot and stick approach i.e. funding for a feasibility study or grant for repair versus threat of legislation or simply the latter. This has been proven to stimulate action. That there is some urgency here is without question. Any empty building is in danger of dry rot to truss and rafter ends and ultimate collapse of the roof. Inertia of air in a closed building can promote moisture transfer into roofing construction, particularly those abutting solid masonry, leading to the growth of dry rot mycelium. St David's Church is particularly at risk having been empty for some 15 years.

Pedestrianisation of Broad Street and High Street.

Exponents of this appear to have lost sight of the medieval plan which still exists and how it functioned and why it is still viable today. Set out in the early Middle Ages, Broad Street would have been designed to cope with a morass of carts being pulled by oxen, with the carts acting as stall. High Street was a specialised horse market with wide grass verges (such a contrast to the present sea of tarmac which surely needs to be replaced with a more attractive tegula hard standing). Market Street was part of Back Lane to enable exit of market traffic into the remainder of Back Lane, and was only developed in the 19thC as a shopping area. The 18thC saw the carts in Broad Street replaced by some horses and carriages but the street was still a hive of activity, particularly on market day. Today's cars are simply the next phase in this area which needs to be busy and active to create much needed vitality in the conservation area. To pedestrianise would create a deadly dull area. There are numerous examples all over Britain, one of the most notable being Market Street, Poole in Dorset. As for a cafe culture, whilst it has been suggested for Severn Street it must be remembered that the Welsh climate is primarily a rainy affair, so unless the street was to be covered with a gigantic roof, it would be difficult to see how such an outdoor eating culture would survive. By far the most important reason to preserve the status quo is the need for the quick turn-around for visiting cars whose occupants want to purchase one or two items and then leave. This is the only way existing shops, already starting from a negative stance, due to the pandemic, will survive. In particular the elderly and mums with prams rely on this aspect. Back Lane car-park is largely a white elephant, as it is simply too expensive and too far for the elderly, disabled and others desiring a quick visit, to patronise particular shops. Ditto Ladywell car-park. The nature of the existing shops caters for this passing vehicle enabled footfall and any attempt to interfere with it will exacerbate the already depleted economy.

Finally Newtown needs to be made into a tourist destination. Thousands flock to Llangollen to congregate on the bridge, and see the self same river formation as exists in Newtown, where the bridge is of even more importance being purpose designed by Thomas Penson, as was the Wool Mart (Regency Centre) and St David's Church. Three such important structures by one historically famous architect surely renders Newtown of key importance in the tourism stakes, coupled with the world famous flannel industry and catalogue initiative of Pryce Jones. The only way to achieve this is for a financial stimulus package to upgrade derelict and under-used buildings in conjunction with the Senedd.

Council Response: Thank you for comments which are noted. The retention of character, respecting the historic environment, the greening of spaces, the vitality of streets and the positive re-use of redundant buildings are all important planning principles. As Place Planning rolls out (see also the Design Commission for Wales consultation comments) we expect to see an even greater emphasis on the holistic consideration of these issues. Regarding tourism, you will note the Place Plan contains a chapter on Destination Newtown which is all about improving the tourist offering of the town.

Your views, including the presentation "Newtown and it's Hinterland through the eyes of a Conservator" will be captured in the supporting evidence sections to ensure they are properly considered at subsequent stages. Resulting from your representation, please see the changes the Town Council have made to project CH1. In terms of the usage and regeneration of the town centre, please see the revised project TC1 and the revised timescales in project CH10.

Place Plan SGP Reqs and Draft Responses

Powys County Council Local Development Plan

by: Representation No

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7106 Davies, Owen

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7106.P1		09/02/2021	<input type="checkbox"/>	E	C		M		Summary: Comments on plans to pedestrianise streets

Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . My thoughts are:

- Re instate the parking on Broad Street to pre. COVID. (Not being able to park sends consumers to the out of town centre and town stores.)
- Don't pedestrianise Broad Street - this would kill the town centre totally, if you must do one street I would do High Street, the impact would be a lot less damaging.

Council Response: Thank you for your comments which are noted. If any streets are proposed to be pedestrianised (see Project TC2) there will be a further opportunity for involvement. Across Powys, towns will be adapting to post Covid-19 recovery. The Town Council will be able to co-ordinate local views on the issues such as the Broad Street changes to ensure that longer term solutions are truly "fit-for-purpose". Some of the emergency/short term changes may not be suitable to retain longer term and the issues can be properly assessed going forward working in conjunction with PCC.

In terms of the usage and regeneration of the town centre, please see the revised Project TC1.

by: Representation No

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7107 Oriel Davies Gallery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7107.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Plan, observations on culture, arts and tourism content

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . I support the plan but make the following observations:

Page 9 In the industry section there is no reference to cultural or creative industries.

Page 12 economy: accommodation and food services are mentioned, why not tourism businesses?

With reference to important people there are no Welsh language speaking examples such as John Davies, the triple harpist (who also connects with Romany and Gypsy culture).

Although the plan shows how it aligns with well-being goals, by the time we reach the vision, there is no mention of a vibrant cultural scene, nothing about cultural tourism destination. There is potential for future WG national developments involving Oriel Davies and contemporary art venues. We are the only Arts Council revenue funded visual arts organisation in North Powys.

The arts and culture are key drivers for economic development as well as improving place and mental health and well-being. There is increasing awareness of the importance of support for the growth sector of creative industries. The plan places too much emphasis on employment and manufacturing in the mid 21 century when the majority of creative businesses are increasingly small start ups.

Council Response:

Thank you for comments. Whilst acknowledging the importance of the cultural and creative industries, the Town Council advise that the section (page 9) was taken from external source material so it would not be appropriate to change.

Again, on page 12, the section reproduces data from an original graphic so it is not appropriate to change.

In response to your representation, the document has been amended to incorporate wording changes (Intro section) regarding the triple harpist John Roberts and, in the Vision section, to further highlight the benefits of a vibrant cultural scene.

Thank you for your views concerning the (over) emphasis on employment and manufacturing. However, we consider that the Place Plan does emphasise the arts, culture and small businesses appropriately including their connection to well-being. Therefore, no changes are considered necessary.

by: Representation No

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7108 Canal and River Trust/Glandŵr Cymru

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7108.P1		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Comments and proposed changes to sections concerning the benefit of the canal

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . Glandŵr Cymru, the Canal & River Trust in Wales, (the Trust) cares for Wales' historic canals, made up of the Swansea, Llangollen, Montgomery and Monmouthshire & Brecon Canals, holding them in trust for the nation in perpetuity. A small section of the Montgomery Canal to the east of the Place Plan Area, from Freestone Lock, is held within the Trust's ownership. The Trust notes the long-term ambition highlighted within the Place Plan to work towards the restoration and re-watering of the canal into Newtown as set out on page 89 of the draft, and the resolution to work with the Trust to this end.

The Trust previously provided comments to an earlier draft version of the plan on 9th March, 2020.

Policy CH-f

The Trust notes the addition of cross-referencing to other canal-related policies and projects. We would recommend that in addition to the current text, the wording of this policy makes reference to proposals for the 'sensitive' repair and restoration of the Montgomery Canal to ensure consistency with other policies in this plan (notably Policy T-a).

Policy CC-f

The Trust welcomes the recognition given to the canal's status as a designated Special Area of Conservation.

1.5 Health & Well-being (page 55)

This section refers to the key role that Open Spaces (including waterways) play in supporting the health and well-being of the community, noting the links between this topic and others in the plan. It is considered that this section could go further to reflect the distinct benefits associated with waterways in terms of health & wellbeing.

Canals are special amenity spaces and routes, which help improve connectivity between places, enhancing liveability and supporting healthy and active living. This has been witnessed during the Covid-19 pandemic when many of our towpaths have seen significant uplift in usage, as people looked to local greenspace for recreation and wellbeing opportunities demonstrating the value of this type of accessible asset for local communities. Crucially, the Montgomery Canal offers the community access to health and wellbeing, while also providing vital links to other green and blue spaces. While the majority of the canal corridor within the Place Plan area has yet to be restored, any future restoration project may wish to note the potential to provide a range of social, economic and environmental wellbeing benefits for local communities.

We would therefore welcome specific recognition of the canal's health and well-being benefits within the plan.

Policy T-a

The Trust welcomes additions to this policy following our previous comments and acknowledge reference to sensitive restoration and improved signage as ongoing projects. We note the additional reference of the canal as a multi-functional resource and while this is true with regard to tourism, these benefits extend beyond this topic area. As noted above, the multi-functional nature of the canal has the potential to bring multiple health and well-being benefits. These wider links could be acknowledged within the policy.

2.1 Open Spaces (page 66)

This section refers to a number of important functions of green spaces in the Place Plan area. While reference is made to the canal path and canal dry bed within Appendix 13: Open Spaces of Importance to the Community, this could be reinforced within this section. We recommend consideration of the following amendment: "Green and blue spaces provide several important functions to society..."

Council Response: Thank you for your comments. The over-arching Local Development Plan contains a strong emphasis on the protection of the canal/canal route for its own sake and for its multi-functional benefits (Policy TD3 LDP). The Place Plan has added further detail to these aims in the local area. Further to your representation wording changes have been made to Policy CH-f and Policy T-a and to the Open Spaces section at 2.1.

Place Plan SGP Reps and Draft Responses

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
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7108.P1		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Comments and proposed changes to sections concerning the benefit of the canal
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Please be advised that for planning purposes, open space is defined as having "public value" including land and water (Technical Advice Note 16). As we consider green infrastructure to include blue spaces, we would discourage the deliberate separation of the two terms to avoid confusion. However, "Waterways" have now been added to the definition/ types of open space listed under the title at 2.1 in the Place Plan as we realise this was an omission.

by: Representation No

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7131 Local Access Forum

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7131.P1		18/03/2021	<input type="checkbox"/>		C	W	M		Summary: Comments on Newtown Place Plan - more reference should be made to PROW

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . We very much welcome the development of this plan and our comments are set out below under the various Headings within the document.

Character and Heritage

Rights of way are part of the heritage of Newtown. They have been used for generations and tell a story about the history of the area. It would be helpful if this could be made clearer in this chapter and mentioned specifically in one of the policies.

We are very much in support of project CH3 to seek funding for the repair and renewal Dolerw bridge.

Housing and future development

On policy HFa it would help to demonstrate the importance of non-vehicular routes when considering housing developments, if this policy could explicitly refer to taking opportunities to link pedestrian routes on estates to the existing rights of way network.

It would also help to be clear in the policy that any changes of rights of way required by housing developments will require, at least, the same length of path to be re-provided.

Community facilities

On Policy CFa can it be made clear please that rights of way are considered to be community facilities and, as such, any proposals that will result in their loss will be strongly resisted?

Business, learning and employment

We are very much in support of project HW5 - seeking funding for a project to construct an accessible path up and around Trehafren Hill in conjunction with the already built cycle track.

A safe and tidy town

On project ST1 can specific reference be made to rights of way please as they are often in a much worse condition than normal pedestrian routes? That is also the case with some of the furniture on rights of way, e.g. stiles, bridges etc.

Green Newtown

On Policy OSa which refers to the loss of public open space arising from development being resisted, can this be expanded to specifically mention rights of way as well please?

We are very much in support of project OS2 to enhance the use of the river and open spaces. Could this be expanded to refer to rights of way please?

Active travel and transport

On Policies AT a & b about securing pedestrian and cycle ways in new developments, can specific reference to improving existing rights of way be included here as well please? Can consideration also be given please to pursuing new routes to be made rights of way?

On project AT2 can it be made clear please that this audit should include all rights of way? It would also be useful to build in further audits in future years to identify and then resolve any future maintenance issues.

We are very much in support of projects AT4, AT7, AT8, AT9, AT10 and AT11 about improving and protecting footpaths and bridleways.

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7131.P1		18/03/2021	<input type="checkbox"/>		C	W	M		Summary: Comments on Newtown Place Plan - more reference should be made to PROW
<p>What the needs of walkers and cyclists are mentioned in the plan, there is little reference to horse riders. It is important that account is taken of the needs of those wishing to travel by horse. By way of example one of our members has referred to a recent trip into Newtown on his horse to take him to the veterinary surgery. He rode into town from the west along the Llanidloes Road, passing under the Nantoer railway bridge, where there is no alternative to the main carriageway, and sight-lines are particularly restricted. Improvements to the traffic management arrangements need to take account of horse riders.</p> <p>Tourism, culture and attractions On policy Ta in the list of welcome tourist initiatives, can reference be made please to projects which aim to encourage tourists to take advantage of the rights of way in the area?</p> <p>Horse Riders Newtown has the only river crossings for several miles in either direction, and so is an essential link between bridleways on either side of the river. It would therefore be helpful please to look at the provision of a safe route to and across the river for horse riders.</p> <p>General It will be apparent from the comments above that we think there should be more reference to rights of way in the Plan. We would be happy to offer further advice as the Plan developed so please keep in touch with us on this matter.</p> <p><i>Council Response:</i> Thank you for your comments. We understand the importance of protecting and improving rights of way for all users. The Local Development Plan (to which the Place Plan is subsidiary) contains Policies SP7(3), DM13(9) and Transport policy T1 to this effect.</p> <p>We read your comments regarding horse-riding with interest. It is obviously important to know how paths are valued and used locally and where improvements could be made (such as the River Crossing issue to enable access to bridleways).</p> <p>We will pass a copy of your comments to the Council's PROW team and the Council's Active Travel Officer to alert them to your views.</p> <p>The Local Access Forum's support to various policies/projects in the Place Plan is appreciated. In response to your proposed alterations surrounding more mention of public rights of way, additions have been made to the Active Travel Key Facts section, the supporting evidence section (Character and Heritage), to Policy HF-a, Project ST1, Policy OS-a and Project OS2. We also include the Local Access Forum as a Suggested Collaborator for Project AT3 where safe routes for horse-riders can be given consideration.</p> <p>With these additions and given the statutory protection offered to PROW we do not consider other changes to be necessary.</p>									