



Powys County Council

---

# **Powys Replacement Local Development Plan**

Initial Integrated Sustainability Appraisal Report  
Appendix B





Powys County Council

---

# **Powys Replacement Local Development Plan**

## **Initial Integrated Sustainability Appraisal Report Appendix B**

**Type of document (version) Public**

**Project no. 62280832**

**Our Ref. No. 808795-WSP---10\_P05.01**

**Date: July 2024**

WSP

Kings Orchard  
1 Queen Street  
Bristol  
BS2 0HQ

Phone: +44 117 930 6200

WSP.com



# Quality control

---

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Full Draft for client review	Final for consultation		
Date	03/07/2024	22/07/2024		
Prepared by	Ellie Abbott Robert Deanwood	Ellie Abbott Robert Deanwood		
Checked by	Alastair Peattie	Alastair Peattie		
Authorised by	Robert Deanwood	Robert Deanwood		
Project number	UK-62280832	UK-62280832		
Report number	01	02		



# Contents

---

<b>ISA Scoping Comments</b>	<b>1</b>
<b>Introduction</b>	<b>1</b>
<b>Summary of Responses to the ISA Scoping Report and Introduction to the ISA</b>	<b>1</b>

# Appendix B

## ISA Scoping Comments

---



# ISA Scoping Comments

---

## Introduction

The ISA Scoping Report was prepared as the first step in the ISA process for the Replacement LDP. The consultation responses made on the ISA Scoping Report are set out in this appendix along with an indication of how they have been taken into account.

A total of five respondents provided comments on the ISA Scoping Report and five respondents provided comments on the Introduction to the ISA. A summary of the respondents is provided in Table 1 below.

**Table 1 – Respondents to the ISA Scoping Stage**

Consultation on the Scoping Report - respondents	Consultation on the Introduction to the ISA – respondents
Clwyd-Powys Archaeological Trust	Clwyd-Powys Archaeological Trust
Dyfed Powys Police	Comisiynydd y Gymraeg / Welsh Language Commissioner
Cadw	Newtown & Llanllwchaiarn Town Council
Glandwr Cymru / Canal & River Trust Wales	Mineral Products Association
Natural Resources Wales	Cadw

A summary of the key issues raised is provided below with the detailed responses and how they have been taken into account set out in Table 2.

## Summary of Responses to the ISA Scoping Report and Introduction to the ISA

The main issues raised by respondents with regard to the ISA Scoping Report and Introduction to the ISA are summarised below:

- General support for the issues identified, objectives and guide questions.
- Specific reference to assets which provide biodiversity, green infrastructure, active travel and leisure use.
- The need for specific reference to the Mid Wales Area Statement and its themes of biodiversity, sustainable land, water and air.
- The need for further detail on air pollution arising from Nitrous Oxide and Ammonia.

- More detailed reference to the Powys Wellbeing and Wellbeing Assessment to inform the baseline and appraisal criteria.
- Noting that adaptation of the built environment to the predicted effects of climate change is central to realising sustainable development, as set out in the Wellbeing of Future Generations (Wales) Act 2015, which is aligned with Building Better Places (July 2020), Future Wales: The National Plan 2040 and the State of Natural Resources Report (SoNaRR) (2020).
- The need for amendment to site appraisal criteria to reflect the wider effects on designated sites and priority habitats and species.
- The need for amendment to objective wording and criteria, including site appraisal criteria to emphasise matters such as green infrastructure networks, climate change adaptation and generally and to include sports facilities, active travel routes, and accessible natural or semi-natural greenspace.
- Use of trend analysis where data is available, incorporated into future updates.
- Textual changes relating to specific issues, where suggested, including additional references to data sources, and clarifications as required, for example in relation to the evidence in documents such as the State of Natural Resources Report (SoNaRR) (2020).
- More specific reference to the role of urban greening, woodland and tree cover as responses to the challenges relating to biodiversity decline and climate change.
- Specific references to the Powys Dark Sky Reserve.
- Attention to the wording of ISA Objectives and attendant sustainability issues.
- Suggestions for issues to be included in the emerging Habitats Regulations Assessment.
- Additional sources of information to be included as part of the promotion of the Welsh language and culture as part of the implementation of the LDP.

**Table 2 - Consultation Response Summary**

id	Respondent	Summary	Response/Action
<b>ISA SCOPING REPORT</b>			
5	Clwyd-Powys Archaeological Trust (Mark Walters, Development Control Archaeologist) [210]	<p>1. Do you think that this Scoping Report sets out sufficient information to establish the context for the ISA of the draft Replacement Local Development Plan in terms of the review of plans and programmes and baseline evidence and analysis? Yes</p> <p>2. Do you agree that the main economic, social and environmental issues identified are relevant to the ISA of the draft Replacement Local Development Plan? We agree</p> <p>3. Do you agree with the proposed approach to the ISA of the draft Replacement Local Development Plan? Do the ISA objectives and guide questions that comprise the ISA Framework cover a sufficient range of environmental, social and economic topics? We agree</p>	Support noted.
8	Dyfed Powys Police (Jayne Briggs, Designing Out Crime Officer) [557]	<p>The below information has been provided as a result of researching LDPs in other areas with the aim of ensuring the next Powys plan incorporates Designing out Crime and the principles of Crime prevention through Environmental Design.</p> <p>There is no mention of crime and disorder or statutory obligation under the Crime and Disorder Act 1998. The Council has responsibility under section 17 of the Act to take account of the need to deter and prevent crime in carrying out all its responsibilities, which include planning. Used sensitively, the planning system can be influential in producing active, well managed environments that help to discourage crime and disorder by encouraging developers to adopt designs for new developments. Any design solution or security measures should remain sensitive to local circumstances and the application should reflect the characters and amenity of the area.</p>	<p>All references to designing out crime have been collated under the health and well-being topic and ISA Objective, including appraisal policy appraisal criteria. Designing out crime is not referenced in site appraisal criteria as this is a detailed design issue which will be part of a detailed planning application.</p> <p>Additional text to be inserted in new paragraphs 3.5.23 to 3.5.25 under baseline evidence for crime to refer to the Crime and Disorder Act and</p>



id	Respondent	Summary	Response/Action
		<p>Prior to submitting detailed proposals, developers are encouraged to seek advice by engaging in pre-application discussions with the Dyfed Powys Police Designing out Crime Officer. Any recommendations received should be taken into consideration in relation to the development proposal. Sites of significant interests (for example, Listed Buildings) a balanced compromise must be agreed. Developers are further encouraged to submit statements in conjunction with planning applications that emphasise and clearly demonstrate the proposed measures taken to design out crime.</p> <p>All new developments and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime. In particular developments shall:</p> <ol style="list-style-type: none"> <li>1. Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths.</li> <li>2. Have well defined routes, spaces and entrances that provide convenient movement without compromising security.</li> <li>3. Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space.</li> <li>4. Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution.</li> <li>5. Be designed with management and maintenance in mind, to discourage crime in the present and future.</li> </ol> <p>There does not seem to be any reference to Secured by Design a Secured by Design Gold award is a requirement by Welsh Government for grant funded social housing projects under their Development Quality Requirements (WDQR). Crime and the fear of crime is a concern for communities. By building homes to Secured by Design standards (Academic) research suggests crime and anti-social behaviour can be</p>	<p>Secured by Design standards. This legislation will also be captured in Appendix 2 under review of plans and programmes.</p>

id	Respondent	Summary	Response/Action
		<p>reduced by up to 80%. This reduces demand across all public services as we strive towards the goals of the Wellbeing of Future Generations Act. All Developments should be encouraged to incorporate the principles and practices of the Secured by Design Award Scheme, and reflect both the safety of people and the security of property.</p> <p>Welsh Government’s Technical Advice note 12 states 5.17.3 The Safer Place and Secured by Design Initiative provide recognised standards that have been shown to reduce crime (particularly residential burglary) and the impact of crime upon neighbourhoods. It is desirable for the security of all housing developments, public buildings, and all buildings funded by public bodies, to achieve similar measurable standards. I would also ask for the above to be reflected in the document and for Secured by Design standards and principles to be considered for all developments and consideration to implement a Planning Condition to this effect to be considered on an individual basis.</p> <p>In appropriate cases, where crime prevention or the fear of crime is considered material to a proposed development the Council may consider imposing community safety conditions or seek developer contributions via legal agreements for crime prevention through environmental design (CPTED), community safety initiatives, improved street lighting, alley gating, provision of CCTV, landscaping improvements or other necessary security measures.</p> <p>All new schools built in Wales should meet Secured by Design standards.</p> <p>All planning applications that fall with the criteria for Public Accessible Places should be referred to Dyfed Powys Police Designing Out Crime officer at the “concept stage to work with Counter Terrorism Security</p>	

id	Respondent	Summary	Response/Action
		Advisers to advise on reduction of vulnerability to terrorism and in line with the new legislation.	
108	Cadw (Ms Jenna Arnold, Historic Environment Branch) [1211]	<p>The ISA scoping identifies the Historic Environment as a topic, along with the key issues. It also states that one of the ISA objectives (No.13) is "To preserve and enhance the Powys' heritage resource, including built and archaeological assets" and poses questions to consider in the ISA.</p> <p>An ISA produced following this scoping will properly consider the impact of the proposed Powys RLDP on the historic environment.</p>	Support for the ISA objective relating to historic environment is noted.
47	Glandwr Cymru - Canal and River Trust in Wales (Mr Tim Bettany-Simmons, Area Planner & Special Projects) [573]	<p>Section 3.5: Biodiversity and Green Infrastructure</p> <p>The Montgomery canal is a designated Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) in recognition of the protected populations of floating water plantain that it supports. The canal corridor within Powys contributes to the blue/green infrastructure within the area and as noted in paragraph 3.3.2. We consider that paragraph 3.3.19 should also have referenced the canal. The Trust have no comments to make on the Key Sustainability Issues identified in relation to this chapter.</p>	Additional text added by new paragraph 3.3.27 under baseline evidence for biodiversity and green infrastructure regarding the contribution of the Montgomery Canal.
48	Glandwr Cymru - Canal and River Trust in Wales (Mr Tim Bettany-Simmons, Area Planner	<p>Section 3.7: Health and Wellbeing</p> <p>The canal corridor and providing access to this has a role to play in promoting health and wellbeing of local communities. Our waterways can provide areas for social interaction, and can enable and support healthy lifestyles through providing access for walking, cycling and waterbourne sports. They also provide direct public access to green and blue infrastructure networks. Waterways have a significant role to play in</p>	Additional text added by new paragraph 3.3.27 under baseline evidence for biodiversity and green infrastructure regarding the contribution of the Montgomery Canal and recognising the health and wellbeing benefits.

id	Respondent	Summary	Response/Action
	& Special Projects) [573]	promoting health and social inclusion, particularly in tackling physical inactivity, obesity and in reducing stress. This is especially true for the many disadvantaged communities who have waterways on their doorstep. Our waterways provide tranquil spaces, which can also provide areas for personal reflection and stress relief. We would welcome recognition of the role the Montgomery Canal plays in this regard towards promoting health and wellbeing.	
49	Glandwr Cymru - Canal and River Trust in Wales (Mr Tim Bettany-Simmons, Area Planner & Special Projects) [573]	<p>Section 3.8: Transport and Accessibility</p> <p>Approaches towards the promotion of walking and cycling, including the formation of strategic policy, could consider the value of our towpath network, which can provide safe, traffic-free routes for people to travel and exercise. Investment into resurfacing the canal towpath to provide a durable year round surface may be required to maximise its use.</p>	Additional text added by new paragraph 3.6.8 under the baseline evidence for Transport and Accessibility to reflect the contribution of Montgomery Canal towards active travel.
50	Glandwr Cymru - Canal and River Trust in Wales (Mr Tim Bettany-Simmons, Area Planner & Special Projects) [573]	<p>Section 3.11 Material Assets</p> <p>This section sets out assets which should be safeguarded and includes the Montgomery Canal. It is unclear if this section should also include reference to the ongoing restoration of the Montgomery Canal. We do not consider that Montgomery Canal sits comfortably within the topic area as it appears more focussed on minerals and waste. The restoration of the canal would likely site more comfortably is other topic areas such as cultural heritage or health and wellbeing.</p> <p>The Trust supports proposals which secures restoration, preserve and</p>	<p>Text added in key policy issues and implications for the ISA (Table 2.1)</p> <ul style="list-style-type: none"> <li>• Ensure the protection of location-specific infrastructure from incompatible development.</li> </ul> <p>Text added under Material Assets p.108 'Likely Evolution of the Baseline' as follows:</p> <p>3.11.17 Growth and associated development across the County could place pressures on site-specific</p>

id	Respondent	Summary	Response/Action
		<p>enhances the Montgomery Canal as a multifunctional resource and opposes proposals that would adversely affect the canal's scientific and conservation designations or prejudice its sensitive restoration. It should be noted that the restoration of the Montgomery Canal relates to the full length of the waterway in England and Wales, to provide a connection to the Llangollen Canal and the wider inland waterway network. We consider the potential restoration of the Montgomery Canal should be included for within the Plan.</p>	<p>infrastructure in turn prejudicing their function/operation or future projects that are key to delivering growth. A new Replacement Local Development Plan would help to protect against such negative effects through policies and careful siting of developments.</p> <p>Text added to key sustainability issues (p109): The need to protect site-specific infrastructure from inappropriate developments that may prejudice their function/operation or future projects that are key to delivering growth.</p>
51	<p>Glandwr Cymru - Canal and River Trust in Wales (Mr Tim Bettany-Simmons, Area Planner &amp; Special Projects) [573]</p>	<p>Section 3.14: Cultural Heritage</p> <p>The Montgomery canal contains a number of designated heritage assets and we welcome the reference at paragraph 3.12.15 in relation to the canal being identified as linear heritage. We broadly support the Key Sustainability Issues listed.</p>	<p>Support is noted.</p>
52	<p>Glandwr Cymru - Canal and River</p>	<p>Views on the effects of the proposals would have on the Welsh Language.</p>	<p>Response noted.</p>

id	Respondent	Summary	Response/Action
	Trust in Wales (Mr Tim Bettany-Simmons, Area Planner & Special Projects) [573]	The Trust have no comment to make on this matter in relation to the Local Plan.	
53	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Our comments are provided in the context of our statutory role as a consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004; our purpose to ensure that the environment and natural resources of Wales are sustainably maintained, enhanced, and used now and in the future; and as advisers to Welsh Government on the natural heritage and resources of Wales and its coastal waters.</p> <p>We have provided a response to the three consultation questions within the body of this letter. You can find more specific comments to the relevant sections of the report in Annex1.</p> <p>The comments we have provided are made without prejudice to any comments we may wish to make when consulted on any subsequent ISA consultations. At the time, there may also be new information available which we will need to take into account when making a formal response.</p> <p>Overall, we are happy with the approach of integrating multiple assessment processes within the report and we welcome the efforts made in undertaking this ISA. We also note the intention to produce a separate Habitats Regulations Assessment and welcome the opportunity to comment on its key findings once available.</p>	Response noted.

id	Respondent	Summary	Response/Action
54	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Response to Question 1:</p> <p>Overall, we consider the ISA offers scope to assess emergency measures to tackle the climate and nature crisis: Natural Resources Wales / State of Natural Resources Report (SoNaRR) for Wales 2020</p> <p>As identified in Section 2.1.1 of the report, the ISA will need to meet the requirements of an Environmental Report under the Environmental Assessment of Plans and Programmes(Wales) Regulations 2004 (the SEA (Strategic Environmental Assessment) Regulations).</p> <p>Identifying the sections of the ISA which will comprise the Environmental Report and detailing the methodology for its preparation would be helpful to demonstrate this.</p> <p>As raised in our response letter of 04/02/2022 to the Review Report for the RLDP, we seek to ensure that the challenges associated with agricultural developments in Powys are adequately considered . At the time we encouraged you to ensure that the RLDP is informed by sufficient and robust evidence relating to its agriculture land use, land cover and habitats, to ensure that agricultural developments, particularly for new and expanding farming enterprises, are in places which do not potentially conflict with nature recovery efforts. This includes consideration of projects within Powys, such as Mid Wales Growth Deal, which includes funding to restore part of the Montgomery Canal SAC, to restore and maintain ecosystem resilience for public well-being. It is important to ensure that growth options and strategic sites avoid important ecological areas and can be realistically delivered through the plan, given environmental and infrastructure constraints.</p> <p>We consider potential Water Management issues, as described in Section 3.8.13 of the report, satisfactorily cover the most significant factor influencing water quality and fully considers the findings of the Compliance Assessment of Welsh River SACs against Phosphorus Targets Report No.489 we published as well as the relevant River Basin Management</p>	<p>1.Report Structure</p> <p>Reporting requirements are set out in Section 1.2, including the SEA Regulations at 1.1.8, how the ISA will be prepared at 1.1.23 and 1.1.24 as follows: The ISA brings together into a single framework the SA, SEA, HIA, EqIA and WLIA to present a common and integrated assessment of the Replacement Local Development Plan strategy and policies (Figure 1.1). In order to demonstrate compliance with the individual requirements, a separate output, presented in Appendices to the ISA Report will be published containing the EqIA. The HRA will be published as a separate report. The ISA will appraise the environmental, social and economic performance of the Replacement Local Development Plan and any reasonable alternatives. In doing so, it will help to inform the selection of the options for the Replacement Local Development Plan concerning (in particular) the quantum, distribution and location of future development in Powys. The ISA process will also identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation as well as</p>

id	Respondent	Summary	Response/Action
		<p>Plans.            However, we note that, although you have referenced the Lichen surveys to investigate ammonia impacts Report No. 298 published in May 2019 in Appendix B of the report and stated that The ISA should contain objectives relating to the enhancement and protection of air quality, which will in turn inform the preparation of the LDP, the section on air quality within the report does not make any reference to the issues outlined in the Report No.298.We also advise that the objectives and priorities of the ISA need to consider and align with those presented in the Mid Wales Area Statement and the Powys 2022 Wellbeing Assessment. These two documents should be integrated within Appendix B (Review of Plans, Programmes and Strategies) of the report. The RLDP will need to address the risks posed by future developments, in terms of potential for additional nutrient loading on sensitive environments and protected sites. The issues identified within Section 6 (Environment) of the Powys Wellbeing Assessment should be considered and clearly captured within the ISA objectives, at present they are not we advise they are considered going forward.            We acknowledge there are ongoing studies being undertaken to inform the evidence base of the RLDP as stated in Section 4.3.1 of the ISA scoping report. However, it is not clear whether further evidence has been gathered with regards to the issue of nutrient loading.</p>	<p>opportunities to improve the contribution of the Local Development Plan towards sustainability. The Environmental Report is a term applied to the SA/SEA element of the ISA.</p> <p>2.Agricultural Development &amp; Mid Wales Growth Deal            The Mid Wales Growth Deal is referenced at 3.11.4 with example projects cited. This has been expanded to reference the agricultural sector as follows: P13            Specific reference (p.15) to the agriculture food and drink sector includes: "a strong and vibrant agricultural sector generating significant employment and produce to a nationally and internationally recognised standard, coupled with industrial and innovation strengths offers the opportunity to grow the economic base significantly and lead on new high-value food development." The representor comment: "It is important to ensure that growth options and strategic sites avoid important ecological areas and can be realistically delivered through the plan, given environmental and infrastructure constraints." is noted and will be the</p>



id	Respondent	Summary	Response/Action
			<p>subject of the strategy development of the RLDP with policies and proposals appraised for their likely significant effects.</p> <p>3.Lichen Survey/Air Quality Text added to air quality section to specifically reference the Report 298 3.9.10 Additional scientific work on the key indicator of lichens recommends (s.7.4.2) that: "The statistically significant link between ammonia concentrations and the decline in Bryoria fuscescens in Wales indicates that this distinctive lichen can be used to indicate areas where ammonia levels are currently very low. Such areas are now rare in Wales, and require protection from the ongoing national increase in ammonia. It is suggested that NRW and other bodies should use the presence of Bryoria lichens as a key indicator of sites that are highly vulnerable to ecological damage from intensive agriculture."</p> <p>4.Mid Wales Area Statement Text has been added at 3.3.31 and 3.3.32 as follows: Powys County Council is required to have regard to the</p>

id	Respondent	Summary	Response/Action
			<p>Mid Wales Area Statement under Section 6 of the Environment (Wales) Act 2016. The Area Statement is wide-ranging, covering the following four themes: biodiversity, landscape, sustainable land, water and air, forestry resources and reconnecting people and places, linked by the need for adaptation and mitigation in response to the declared climate emergency. In respect of biodiversity, the Mid Wales Area Statement seeks to: identify the main causes of the nature emergency including what needs to be done, by whom and where / improve the Favourable Conservation Status of designated sites / identify opportunities for connectivity between those sites and other areas / make nature a priority through planning, policy, and practical measures. The MWAS is also referenced in Table 2.1 key policy messages Key issues have been updated to reflect MWAS objectives in exec summary, and at pp.129/130</p> <p>5.Well-being Plan &amp; Well-being Assessment The text in Appendix B relating to the Powys Well-being Assessment has</p>

id	Respondent	Summary	Response/Action
			<p>been adapted to clarify the link with the Well-being Plan which is being developed and to set out the areas of focus according to the Well-being Assessment. The Well-being Assessment sets out, under several topics, the objectives of the Mid Wales Area Statement e.g. page 141: The Mid Wales Area Statement seeks to: identify the main causes of the nature emergency including what needs to be done, by whom and where / to improve the Favourable Conservation Status of designated sites / to identify opportunities for connectivity between those sites and other areas to make nature a priority through planning, policy, and practical measures. These objectives are specifically captured in the report under the biodiversity topic. The Powys Well-being Assessment is summarised in Appendix B as part of the review of policy documents. Data within the Well-being Assessment is used throughout the Scoping Report to help inform the baseline.</p>
55	Natural Resources Wales - Mid	<p>Response to Question 2: Without carrying out a review of all relevant baseline information, it is not possible to identify all potential environmental issues that may occur in</p>	<p>Trend analysis is used throughout the Scoping Report, where appropriate and data is available. The contents of the</p>

id	Respondent	Summary	Response/Action
	Region (Strategic Policy and Planning) [688]	<p>Powys. It is important to ensure sufficient information is utilised to understand the likely significant environmental effects of the LDP on the relevant environmental topics, and the inter-relationships between them. This should include information which characterises the areas covered by the LDP, and a review of existing available information to understand if trends demonstrate how the existing LDP is achieving or progressing towards/moving away from targets and critical thresholds. Such trend analysis can help to highlight existing and potential future environmental problems. Therefore, while we agree with the main issues identified so far, we refer you to our answer to question one, which provides further detail on those topics we advise are included.</p>	<p>Scoping Report are considered to be proportionate and provide a robust basis for the determination of likely significant effects associated with policies and site proposals through the preparation of ISA Objectives and associated assessment criteria. The ISA process includes the preparation of monitoring framework which in combination with the Council's AMR will provide the basis for monitoring the effectiveness of the Replacement Local Plan. Notwithstanding this, various suggestions for amending the Scoping Report with additional trend-based data have been incorporated. In addition, updates to the Scoping Report can be prepared if significant new data becomes available, or if the Scoping Report is considered to be out of date (typically 3-5 years).</p>
56	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Response to Question 3: Notwithstanding the comments made above, we agree with the proposed approach to the ISA and would like to emphasise the importance to ensure the Plan's cumulative development and land-use proposals bring appropriate biodiversity benefits to help halt and reverse the decline in nature and maintain areas already rich in biodiversity, with no unacceptable, direct or indirect, impacts or damage to habitats and species. The Plan should also ensure that development and land-use proposals are</p>	<p>Agreement with the proposed approach to the ISA is noted. The important matters referred to are also noted and will be considered during plan preparation. Recommended changes relating to specific objectives will be responded against the relevant representation.</p>

id	Respondent	Summary	Response/Action
		<p>individually and cumulatively compatible with the scale and pace of decarbonisation and sequestration needed to remain aligned with the Paris Agreement and Welsh carbon budgets (to 2030) and targets throughout the plan period.</p> <p>Adaptation of the built environment to the predicted effects of climate change is a key factor to meet the needs of current generations, without compromising the ability of future generations to meet their needs, as set out in the Wellbeing of Future Generations (Wales) Act 2015 , which is aligned with Building Better Places (July 2020), the Future Wales The National Plan 2040 and the State of Natural Resources Report (SoNaRR). The proposed objective-led methodology comprises an assessment framework of multiple assessment questions, to identify the nature, type, duration and significance of effects for fifteen (15) sustainability objectives across the eleven (11) ISA themes.</p> <p>The definitions of Significance are included in Appendix C of the report. We have made recommendations for changes to some of the questions within individual objectives. These recommendations can be seen in Annex 1.</p>	
57	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 1.5 (Page number 18)</p> <p>Issue: Structure of the scoping report</p> <p>Comments: The Section numbers in 1.5.1 do not match the actual numbering within the index and the report sections. The numbers need to be amended accordingly.</p>	<p>Section numbers amended at p.17 and p.25</p> <p>Amended numbering of sections in para. 1.5.1 to ensure it reflects the structure of the report.</p>
58	Natural Resources	Section 2.2 (Page number 19)	The Objectives of the Replacement LDP are being developed and will be

id	Respondent	Summary	Response/Action
	Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Issue: Plans, Programmes and Strategies Reviewed - Summary of Objectives, Key Policy Messages and Implications for the ISA</p> <p>Comment: This section briefly refers to the plans, programmes, and strategies (PPS) and relative objectives that have been reviewed as part of the process. However, no reference is made to the objectives of the proposed RLDP. As a starting point for the assessment, the objectives of the RLDP (or LDPs in general if they are not yet available) should be detailed to focus the identification of relevant PPS, and environmental protection objectives.</p> <p>We advise that detailing RLDP objectives in the scoping report would enable a more specific focus on where, how, and when they might be achieved and, with reference to baseline data and trends, what the likely significant environmental effects could be.</p>	included and assessed as part of the next stage of the ISA process.
59	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Table 2.1 (Page number 20)</p> <p>Issue: Table 2.1 summary of key objectives arising from the review of plans, programmes and strategies.</p> <p>Comment: To ensure evidence-based decisions, we suggest all sources, forms and avenues of sound information are explored and, where relevant, incorporated within the assessment framework. The range of PPS reviewed is significant (Appendix B). However, the data sources are not as clearly presented within the Key Policy Messages in Table 2.1 (section 2.2.2).</p>	The key policy messages have been drawn from the range of documents reviewed and distilled in order to provide a basis for the assessment of the RLDP policies and proposals. As such they are considered appropriate. Key policy issues have been amended where specific comments provided.
60	Natural Resources Wales - Mid Region	<p>Table 2.1 (Page number 21)</p> <p>Issue: Soil Key Policy Messages</p>	Text added to Table 2.1 "Minimise loss of and increase restoration of peatland."

id	Respondent	Summary	Response/Action
	(Strategic Policy and Planning) [688]	Comment: This section does not refer to the importance of minimising the loss and increasing the restoration of peatland in line with the findings of the baseline analysis in section 3.7.10 of the report and The National Peatland Action Programme priorities.	
61	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Table 2.1 (Page number 22)</p> <p>Issue: Water - Key Policy Messages</p> <p>Comment: The fourth bullet point in the list states 'Consider the Impact of the LDP on the Dyfi Estuary SPA and Ramsar Site'. Is there a reason why the River Severn, Wye and Usk estuaries have not been included? If these have been scoped out, the reasons should be made clear in the baseline assessment. We advise they should be included in the assessment and HRA.</p>	Text added to Table 2.1 "Consider the Impact of the LDP on the Dyfi Estuary SPA and Ramsar site, River Wye and Usk SAC's, and the Severn Estuary, SAC, SPA and Ramsar site."
62	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Table 2.1 (Page number 23)</p> <p>Issue: Landscape - Key Policy Issues</p> <p>Comment: The list of bullet points should include consideration of designated landscapes and dark sky areas (these are mentioned in section 3.13.10).</p>	Text added to Table 2.1 to refer to designated landscapes and dark sky areas.
63	Natural Resources Wales - Mid Region (Strategic	<p>Section 3.1 (Page number 25)</p> <p>Issue: Baseline analysis</p> <p>Comment: This chapter identifies baseline for each of the required</p>	The LDP objectives will be captured within the ISA as the plan develops in line with national guidance. The Powys Well-being Assessment and evidence

id	Respondent	Summary	Response/Action
	Policy and Planning) [688]	environmental topics, however because the scoping report does not present LDP objectives, we question whether the information is appropriately focussed on the likely significant effects that could influence or be influenced by the LDP? We advise the baseline (chapter 3) should be updated and reviewed to align with the recently published Powys 2022 Wellbeing Assessment (Full Well-being assessment analysis - Powys County Council).	within it has been referenced throughout the baseline analysis.
64	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	Section 3.1.2 (Page number 25)  Issue: Topic areas list (section 3.1.2)  Comment: The Section numbers in 3.1.2 do not match the actual numbering within the index and the report sections. The numbers need to be amended accordingly.	Add location of National Landscapes into figure 3.1 and additional text included under section 3.13 to refer to the relevant National Landscapes (formerly AONBs).  Update numbers in the topic list, para. 3.1.2.
65	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	Figure 3.1 (Page number 26)  Issue: The Geography of Powys  Comment: the Clywdian Range and Dee Valley AONB should be added to this figure. AONBs have the same planning status as National Parks and development proposed in the settings of these designated landscapes need to avoid visual impacts which could negatively impact upon the public's enjoyment of a NP or AONB's visual and sensory qualities, namely - scenic quality, tranquillity, wildness and remoteness.	Add National Landscapes onto the map showing the geography of Powys. Specific reference will also be made to the Clwydian Range and Dee Valley and Shropshire Hills National Landscapes under the baseline analysis for the landscape topic.



id	Respondent	Summary	Response/Action
66	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.3.6 (Page number 31)</p> <p>Issue: Reference is made to The State of Natural Resources Report 2016</p> <p>Comment: This section needs to be updated to reflect the most recent version of the SoNARR report 2020.</p>	<p>All references updated to the SoNARR Report 2020.</p> <p>Text added: The SoNARR for Wales (2020) (Executive Summary pp.41/42) identifies under Aim 2 Ecosystem resilience that: "Most habitat types have seen a reduction in diversity over the last 100 years, with the rate of decline increasing from the 1970s onwards. This indicates that ecosystems are not resilient, and many species are not recovering. If diversity continues to be lost, then it may result in the collapse of ecosystems and the services they provide." Supporting evidence indicates that: "Only 31% of Wales is considered to be semi-natural habitat. At least 40% of Welsh habitats are spread out in such small patches that this implies low resilience. / Very few Welsh habitats are reported as being in good condition due to a number of pressures. Freshwater habitats, for example, are mainly affected by nutrient enrichment and physical modifications. / In Wales [habitat] connectivity is at its lowest in lowland habitats where the landscape has been simplified by the loss of semi-</p>

id	Respondent	Summary	Response/Action
			natural habitats and intensively managed land dominates."
67	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.3. (Page number 33)</p> <p>Issue: Biodiversity, Green Infrastructure and Open Spaces</p> <p>Comment: This section does not refer to European and UK species protected under the Conservation of Habitats and Species Regulations 2017 nor the Wildlife and Countryside Act 1981. These two pieces of legislation are however listed within appendix B6. The section should also identify the issues and challenges associated with the presence and risk of introduction of Invasive Non-Native Species (INNS).</p>	Additional text in para. 3.3.4 to refer to relevant legislation and in para. 3.3.5. regarding invasive non-native species.
68	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.3.24 (Page number 30)</p> <p>Issue: Biodiversity, Green Infrastructure and Open Spaces</p> <p>Comment: Green Infrastructure and Open Spaces</p> <p>This section mentions the number of sites with a Green Flag Community Award but fails to note there are no sites with a Green Flag Award which is normally awarded to local authority parks. This indicates that no parks under the direct management of Powys County Council have been assessed to confirm that they are managed to an acceptable standard. We would like to see another bullet point added to Summary of Key Sustainability Issues on page 42. Suggested wording: The need to monitor the quality of publicly accessible green spaces within the County, which could be assessed by the extent to which there is a Green Flag or Green Flag Community award-winning site within easy walking distance of every</p>	Green Flag Awards are a voluntary scheme which draw upon a wide variety of criteria. In terms of accessibility Fields in Trust Standards are more appropriate measures, as used in the assessment of sites in meeting ISA Objective 5 Site Appraisal Criteria. Monitoring criteria, which will include accessibility, will be developed as part of the preparation of the ISA Report.

id	Respondent	Summary	Response/Action
		home in major settlements, using the methodology in the Greenspace Toolkit (see TAN 16 para 2.18).	
69	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.3.28 (Page number 41)</p> <p>Issue: Powys is also experiencing a continued growth in the number of habitats and species within it that are being designated            Comment: The meaning of the word 'designated' in this sentence is unclear. The sentence would be better re-phrased to convey a clearer picture of the baseline situation.</p>	Text within paras 3.3.30 and 3.3.31 clarified to read: "In the absence of a Replacement Local Development Plan, national policy and national and international legislation for the conservation of important biodiversity sites will continue to provide protection for many designated sites. However, a Replacement Local Development Plan will afford protection to the diverse and growing range of locally important sites."
70	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.7 (Page number 75)</p> <p>Issue: Land Use and Soils</p> <p>Comment: This section should also consider land used for Commercial Forestry operations within Powys.</p>	Text added in new para. 3.7.9 to refer to the significant commercial forestry resource as noted by the Mid Wales Area Statement.
71	Natural Resources Wales - Mid Region (Strategic Policy and	<p>Section 3.7 (Page number 80)</p> <p>Issue: Geology Key Sustainability Issues</p> <p>Comment: Section 3.7.13 states that Powys will not have sufficient brownfield sites to accommodate its economic and population growth. The</p>	Key issues at p.80 amended to: read "The need to encourage development on previously developed (brownfield) land as it becomes available following assessment of its biodiversity value." Guide questions for site selection

id	Respondent	Summary	Response/Action
	Planning) [688]	<p>first bullet point of the Key Sustainability Issues states:</p> <ul style="list-style-type: none"> <li>- The need to encourage development on what little previously developed (brownfield) land remains undeveloped.</li> </ul> <p>We would refer you to the Definition and mapping of open mosaic habitats on previously developed land: phase 2 testing methods and developing the habitat inventory (WC0795). Final report. Mike J. Lush, Peter Shepherd, Peter Kirby, Claire E. Lush and Richard Griffiths. 15 January 2016. Prepared for Defra, Natural England and the Countryside Council for Wales by exeGesIS Spatial Data Management, Talgarth, Powys and note that that previously developed land can have far higher biodiversity value than intensely cultivated agricultural land.</p>	<p>added: Will the site use previously developed land where suitable for development?; Create opportunities to develop brownfield previously developed land where this is sustainable this will have no adverse impacts on Open Mosaic Habitats?</p> <p>Planning Policy Wales makes it clear that sites of nature conservation value are excluded from the definition of previously developed land and, therefore, such sites will not be treated as previously developed land as part of the site assessment process.</p>
72	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.8.23 (Page number 86)</p> <p>Issue: Water Flood Risk</p> <p>Comment: New development will need to be in accordance with the revised TAN15, which in its current form continues the existing requirement for all new development to be flood free in the 100/T200yr + Climate Change event (rather than minimised within high flood risk areas) and does not allow for new Highly Vulnerable Development in zone 3. New development proposed in zones 2 and 3 will need to meet the definition of previously developed land, recognising the importance of retaining greenspace not only for flood mitigation, but also for the wider benefits it provides.</p> <p>More detailed information will be available in both the SFCA (Strategic Flood Consequences Assessment) which will be the principal source of</p>	<p>Additional text added in new para. 3.8.26 and para. 3.8.27 to reflect the guidance within the revised TAN 15, the Strategic Flooding Consequences Assessment that will be undertaken as evidence to inform the plan and the emerging Water Framework Directive. Figure 3.3. updated to reflect the Flood Map for Planning.</p>

id	Respondent	Summary	Response/Action
		<p>evidence to inform the plan and locally specific flood risk policies and the emerging Water Framework Directive opportunity catchments work, each of which should be drawn on, to inform this assessment process. FCA (Flood Consequences Assessments) will be required to inform certain planning applications for sites fully or partly within flood zones.</p> <p>Evidence to identify those communities most vulnerable to flooding is available in the Communities at Risk Register Lle - Communities at Risk Register (CaRR) (gov.wales) and the FMfP which shows areas at risk and considers climate change. Figure 3.3 should draw from the FMfP rather than the TAN 15 Development Advice Map and information is also available for surface water in the FMfP.</p>	
73	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Section 3.8.27 (Page number 87)</p> <p>Issue: Water - Likely Evolution of the Baseline without the RLDP</p> <p>Comment: This section states: "It is envisaged that the existing levels of development would continue without the plan. This would place additional pressures upon the water environment through demand and discharge." It is not clear if reference to 'existing levels of development' pre-dates the NRW evidence package outlining phosphorus levels for all river SACs across Wales published on 21st January 2021 and associated planning guidance. Since then, Powys LPA have changed the way it assesses development proposals in line with the guidance and therefore we do not consider the sentence to be accurate in this context. We however, welcome the integration of such concept within the RLDP at policy level.</p>	<p>Para 3.8.27 Text amended to: "New development is likely to place additional pressure upon the water environment through demand and discharge levels, which has prompted NRW guidance on dealing with planning applications which might affect phosphorus-sensitive river SACs" including a footnote reference to NRW guidance on development affecting phosphorus sensitive river SACs:</p> <p><a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en</a></p>

id	Respondent	Summary	Response/Action
74	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.9 (Page number 88 - 92)</p> <p>Issue: Air Quality</p> <p>Comment: We consider the information within this section to be out of date and limited to pollutants which affect human health. No consideration has been given to ammonia emissions which are a major source of concern in Powys. NRW has undertaken a number of investigations that confirm the severity of the issue.</p> <p>We have developed a framework that allows for the appropriate protection for our most sensitive sites as well as allowing us to assess cumulative impacts of existing and new development. The guidance is published by NRW as GN020 and is used by NRW for permitting and Planning as well as by LPAs. This guidance reflects current European and UK case law. This means that prevailing environmental conditions (i.e. background ammonia concentrations) are part of the assessment process and should be considered in the baseline assessment, as even a relatively small addition would be considered unacceptable if it causes a breach of the environmental threshold or exacerbates a threshold that is already breached (ammonia critical levels). Natural Resources Wales / Ammonia assessments: initial screening and evidence gathering (GN 020)</p>	<p>Additional text inserted under section 3.9 to reflect concerns regarding ammonia emissions and NRW's investigations, framework and guidance on the matter.</p>
75	Natural Resources Wales - Mid Region (Strategic Policy and Planning)	<p>Section 3.9.2 (Page number 88)</p> <p>Issue: UK National Air Quality Strategy</p> <p>Comment: Here reference is made to the 2007 National Air Quality Strategy as the key reference. This document has been updated in the clean Air Strategy (2019) and the Wales Clean Air Plan (2020). Both of these</p>	<p>Additional text inserted under section 3.9 to refer to the latest air quality strategy and plan for Wales.</p> <p>Reference made to the updated Clean Air Strategy and Wales Clear Air Plan. The NRW Report No.298 is a detailed</p>

id	Respondent	Summary	Response/Action
	Planning) [688]	documents detail concerns about rural impacts of ammonia and the need to reduce emissions and impacts. Ammonia from livestock is a key issue in Powys as was highlighted in NRW Evidence report 218 Powys Poultry Pilot Study 2015 (naturalresources.wales) Further case studies including areas of Powys are highlighted in NRW Evidence report 298 (lichen studies to demonstrate ammonia impacts nrw-evidence-report-no-298-lichen-surveys-to-investigate-ammonia-impacts.pdf (naturalresources.wales) Which has been included within Appendix B63. We consider ammonia deposition needs a prominent mention alongside these evidence reports.	scientific analysis of air quality indicators and is referenced in Appendix B.
76	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	Section 3.9.7 (Page number 89)  Issue: Ammonia  Comment: The only reference to ammonia is in this section which refers to concerns about new sources but as our evidence report shows, existing sources are the major concerns and new sources can be addressed via NRW ammonia guidance GN20 Natural Resources Wales / Ammonia assessments for developments that require a permit or planning permission	Text added at para 3.9.9 "3.9.9 NRW has undertaken investigations that confirm the severity of the issue. A framework has been developed that allows for the appropriate protection for our most sensitive sites as well as allowing for assessment of cumulative impacts of existing and new development. The guidance is published by NRW as GN020 and is used by NRW for permitting and Planning as well as by LPAs. This guidance reflects current European and UK case law. This means that prevailing environmental conditions (i.e. background ammonia concentrations) are part of the assessment process and will be considered in the baseline assessment,

id	Respondent	Summary	Response/Action
			as even a relatively small addition would be considered unacceptable if it causes a breach of the environmental threshold or exacerbates a threshold that is already breached (ammonia critical levels)."
77	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Figure 3.32 (Page number 91)</p> <p>Issue: Nitrogen Dioxide Concentration in Wales 2007/2017</p> <p>Comment: The data in this figure is out of date and should include the latest year detailed in the annual National Atmospheric Emissions Inventory (NAEI). A similar plot should be detailed for ammonia trends. While NO2 can be seen to be reducing, ammonia is increasing over the same period.</p>	<p>Updated data provided in new figures, including those reported in the National Atmospheric Emissions Inventory and showing ammonia trends.</p> <p>New figures 3.33 and 3.34 inserted to capture updated data</p>
78	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.10.12 (Page number 94)</p> <p>Issue: Climate Change - Baseline</p> <p>Comment: This section relates to measures to prevent or minimise the adverse effects of climate change. It does not refer to building resilience by increasing green infrastructure, carbon sinks and encouraging resource efficiency. We advise this is included.</p>	Text added at para. 3.10.12 to refer to building resilience to climate change by increasing green infrastructure and carbon sinks, and encouraging resource efficiency.



id	Respondent	Summary	Response/Action
79	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.10 (Page number 96)</p> <p>Issue: Climate Change - Key Sustainability Issues</p> <p>Comment: NRW should welcome the identification of "The need to increase woodland and tree cover to help mitigate and adapt to climate change" as a key issue. However, Llandrindod Wells is the only one of Powys' major settlements to reach the 20% tree canopy cover as advocated by the Welsh Government's Woodlands for Wales Action Plan or the Future Generations Commissioners Manifesto for the Future (Hodges, C. 2020. Tree Cover in Wales Towns and Cities: update 2020 - Updated information to help us understand canopy cover to better plan and manage our urban trees. Report No: 465, 26pp, Natural Resources Wales, Bangor (Gwynedd)). Recent research has shown that 40% canopy cover is required from trees to significantly cool streets, and this will be a significant problem for a landlocked county like Powys as climate change becomes more severe (Scale-dependent interactions between tree canopy cover and impervious surfaces reduce daytime urban heat during summer Carly D. Ziter, Eric J. Pedersen, Christopher J. Kucharik, and Monica G. Turner, PNAS. April 9, 2019 vol.116 no. 15 pp 75, 80).</p> <p>We would therefore like to see the bullet point list amended to read: The need to increase woodland and tree cover to help mitigate and adapt to climate change, focusing on achieving 20% canopy cover in all major settlements and aiming for 40% street tree canopy cover in shopping streets and residential streets.</p>	<p>Text added at pp.98/99 to include tree cover information from NRW website: "Urban greening is an important tool in helping to mitigate the effects of climate change, whilst significantly contributing to enhancing quality of life. Research on town tree cover in Powys suggests that the current variation and continuing decline in tree cover needs to be counteracted through: Setting canopy cover targets. Identification of priority towns for the adoption of a strategic approach to canopy cover increase. Optimising funding tools facilitating delivery. Bullet point updated on p.100 to read: The need to increase woodland and tree cover to help mitigate and adapt to climate change, focusing on achieving 20% canopy cover in all major settlements and aiming for 40% street tree canopy cover in shopping and residential streets."</p> <p>Text added at p.98 and p.116: "The need to increase woodland and tree cover to help mitigate and adapt to climate change, focusing on achieving 20% canopy cover in all major settlements and aiming for 40% street</p>

id	Respondent	Summary	Response/Action
			tree canopy cover in shopping and residential streets."
80	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.13.3 (Page number 105)</p> <p>Issue: Landscape - Baseline</p> <p>Comment: Land within the planning area is important for the setting of the Brecon Beacons National Park (BBNP), which includes a UNESCO Global Geopark and International Dark Sky Reserve and the Snowdonia National Park (SNP). Geodiversity, tranquillity and dark skies (and their relationship to dark skies contributing to tranquillity) are therefore important considerations in some parts of the Plan area as identified in Section 3.13.6.</p>	<p>Reference added at p.108: "3.13.3 The Brecon Beacons National Park (BBNP) covers about 17.2% of Powys, with the planning area contributing to its setting. The National Park is designated as an International Dark Sky Reserve, and the western half contains the Fforest Fawr UNESCO Global Geopark."</p> <p>Reference added to the setting and Dark Sky Reserves in the national parks adjoining the Local Planning Authority area, including the Dark Sky Park at Elan Valley within the area.</p>
81	Natural Resources	Section 3.13.6 (Page number 105)	Text added at p.108/109: "3.13.7 Powys' planning area has no nationally

id	Respondent	Summary	Response/Action
	Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Issue: Landscape</p> <p>Comment: There are two NPs - Snowdonia (Powys contributes to its setting) and Brecon Beacons (designation partly lies within Powys) and there is just the one AONB the Clywdian Range and Dee Valley AONB (Powys contributes to its setting)</p>	<p>(UK) recognised landscape designations. However, LANDMAP and the Registers of Outstanding and Special Landscapes of Historic Interest in Wales recognise that Powys has specific areas that are of landscape importance at a national (Welsh) level. In addition, the planning area of Powys borders, or lies close to, the Clwydian Range and Dee Valley National Landscape, the Shropshire Hills National Landscape and two National Parks: Snowdonia and the Brecon Beacons, which must be considered when considering any proposals for development that may affect a designated site's special qualities or the reasons for its designation and its character and setting."</p>
82	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 3.13.8 (Page number 106)</p> <p>Issue: Landscape</p> <p>Comment: This section refers to the number of LANDMAP Visual and Sensory aspect areas assessed as meeting the different evaluations Outstanding, High, Moderate, Low and Unassessed. We recommend adding the area and % of Powys that meets each of the 5 evaluations and including LANDMAP thematic mapping to show distribution. By doing this, it is easier to see landscape as a conservation</p>	<p>Paragraph added at p.111 to read: "In terms of quality, the percentage of Aspect Areas within, or intersecting, the Plan Area that are of 'High' or 'Outstanding' Quality are as follows: Geological landscape 34% Landscape habitats 45% Historic setting 55% Visual and sensory landscape 38%"</p>

id	Respondent	Summary	Response/Action
		<p>resource and as a development constraint when working through strategic planning options you are looking at for the LDP. Whilst you now have a Landscape Character Assessment, having an overview of the resource is also helpful. NRW"s Mid Wales Landscape Area Statement might help provide some ideas on how to present landscape headlines for Powys. To obtain a PDF copy please email: Landscape Planning / Cynllunio Tirwedd CynllunioTirwedd@cyfoethnaturiolcymru.gov.uk</p>	
83	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Section 3.13 (Page number 110)</p> <p>Issue: Key Sustainability Issues</p> <p>Comment: We recommend a new bullet point: The need to promote good site choice and decisions about development scale so that the visual effects of development do not intrude upon areas valued for its scenic quality, tranquillity, and integrity.</p>	<p>Text added at p.113 "The need to promote 'good site' choice and decisions about development scale so that the visual effects of development do not intrude upon areas valued for its scenic quality, tranquillity, and integrity."</p> <p>Additional bullet point inserted under Key Sustainability Issues under section 3.13 relating to landscape, promoting good site choice, scale of development and avoiding intrusive visual effects of development.</p>
84	<p>Natural Resources Wales - Mid Region (Strategic Policy and</p>	<p>Table 4.1 (Page number 120)</p> <p>Issue: ISA Assessment framework - Objectives</p> <p>Comment: SEA topic: Land Use, Soil &amp; Geology identifies two key issues: - The need to make efficient and effective use of land. - The need to protect the most productive and versatile</p>	<p>Text amended to reflect advice: Key Issues:</p> <ul style="list-style-type: none"> <li>• The need to make efficient and effective use of land.</li> <li>• The need to protect the Best and Most Versatile (BMV) agricultural land.</li> <li>• The need to protect soils, in particular</li> </ul>

id	Respondent	Summary	Response/Action
	Planning) [688]	<p>agricultural land.</p> <p>We believe that protection of soils (in particular peatland) should also be a main objective of the LDP for their role in capturing carbon and increasing resilience of the natural environment against the effects of climate change. Peatland retention and restoration should also be included in Objective10 (Climate Change).</p> <p>We also note the first question associated to Objective 6 states: Create opportunities to develop brownfield land where this is sustainable?</p> <p>We recommend that the term where sustainable (in the context of brownfield development) should be replaced throughout the ISA by where this will have no adverse impacts on Open Mosaic Habitats on Previously Developed Land.</p>	<p>peatland.</p> <p>ISA Objective 6: To make the best use of previously developed land and existing buildings and protect higher grade agricultural land</p> <p>Will the policy or proposal ...</p> <ul style="list-style-type: none"> <li>• Create opportunities to develop brownfield land where this will have no adverse impacts on Open Mosaic Habitats on Previously Developed Land?</li> <li>• Protect the Best and Most Versatile land from development?</li> </ul> <p>Table 3.20 Key Sustainability Issues Identified</p> <p>Land Use, Geology &amp; Soils p.119 &amp; p.125 The need to protect and restore soil and peat resources as important carbon sinks and their role in increasing resilience of the natural environment against the effects of climate change.</p> <p>Climate Change p.119 &amp; p.127 The need to protect and restore soil and peat resources as important carbon sinks and their role in increasing resilience of the natural environment against the effects of climate change.</p> <p>Objective 6 Guide Question amended:            Will the policy or proposal - Create</p>

id	Respondent	Summary	Response/Action
			<p>opportunities to develop previously developed land where this will have no adverse impacts on Open Mosaic Habitats? The term 'where sustainable' (in the context of brownfield development) has been replaced throughout the ISA by 'where this will have no adverse impacts on Open Mosaic Habitats on Previously Developed Land'</p> <p>Additional text into Table 4.1 The Proposed ISA Framework to identify the need to protect/retain/restore soils, in particular peatland, as a key issue under SEA topic Land Use, Soils and Geology and under SEA topic Climate Change.</p>
85	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Table 4.1 (Page number 120)</p> <p>Issue: ISA Assessment framework - Objectives</p> <p>Comment: SEA topic: Water the quality of water sources across Powys is recognised but could be worded a bit better as this seems to focus on water sources for public water supply and no emphasis is given to improvements to the natural environment.</p> <p>ISA Objective 7: While the questions listed are about developments 'reducing potential contamination of waterbodies and courses' we consider the wording could be better aligned with the Conservation of Habitats and Species Regulations 2017. We suggest the following wording:</p>	<p>Text amended to reflect advice: Will the policy or proposal ...</p> <ul style="list-style-type: none"> <li>• Reduce water consumption?</li> <li>• Ensure an adequate supply of water can be provided considering current and future projections of water availability and water use?</li> <li>• Be delivered without causing deterioration in water quality in rivers and streams?</li> <li>• Lead to an improvement in water quality in our SAC river catchments?</li> </ul>

id	Respondent	Summary	Response/Action
		<p>- Can the policy or proposal be delivered without leading to any deterioration in water quality in our rivers and streams?</p> <p>- Will the policy or proposal lead to an improvement in water quality in our SAC river catchments?</p> <p>- Will the policy or proposal improve nutrient management for agriculture and reduce loss of nutrients from farmland to the river environment?</p> <p>This would ensure that the question considers nutrients other than nitrate, as agriculture is also a major source of phosphorus inputs into the water environment.</p>	<ul style="list-style-type: none"> <li>• Improve nutrient management for agriculture and reduce loss of nutrients from farmland to the river environment?</li> </ul> <p>Additional text inserted in Table 4.1 The Proposed ISA Framework relating to the SEA Topic Water and associated ISA Objective 7 to better align with the relevant regulations.</p>
86	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Table 4.1 (Page number 121)</p> <p>Issue: ISA Assessment framework - Objectives</p> <p>Comment: SEA topic: Air</p> <p>We refer you to the comments we made with reference to</p> <p>Section 3.9 of the ISA scoping report and advise you integrate the issue of ammonia into the wording of this section and objective questions.</p>	<p>Additional text inserted into Table 4.1 The Proposed ISA Framework to be more specific about air pollution resulting from NOx and ammonia. Additional bullet point under ISA Objective 8 to reflect the need to promote and facilitate enhancements to green infrastructure to facilitate increased absorption and dissipation of NOx and other pollutants.</p> <p>Text at p.123 amended to read: "The need to minimise the emissions of pollutants to air, notably NOx and ammonia." and "Promote and facilitate enhancements to green infrastructure networks to facilitate increased absorption and dissipation of NOx and other pollutants"</p>

id	Respondent	Summary	Response/Action
87	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Table 4.1 (Page number 124)</p> <p>Issue: ISA Assessment framework - Objectives</p> <p>Comment: SEA Topic: Biodiversity, Green Infrastructure &amp; Geodiversity We advise the last bullet point is rephrased to say: The need to protect and enhance sites designated for their ecological and geological interest</p>	<p>Additional text inserted in Table 4.1 to reflect the need to protect and enhance sites that are designated for ecological interest as well as sites designated for their geological interest as a key issue under the SEA topic Biodiversity, Green Infrastructure and Geodiversity.</p> <p>Text amended to read: "The need to protect and enhance sites designated for their ecological and geological interest"</p>
88	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 4.2.6 (Page number 126)</p> <p>Issue: Vision and Objectives</p> <p>Comment: This section of the ISA scoping report refers to the importance of the vision and objectives of the RLDP to be in alignment with the ISA Objectives, but there is no indication at this stage of what the RLDP objectives would be and therefore we are currently unable to comment on whether the information within the ISA report is appropriately focussed on the likely significant effects that could influence or be influenced by the LDP and, whether it aligns with the Powys Well-being Assessment, which does not appear to have been included amongst the plans, policies and strategies considered.</p>	<p>Additional text inserted in Appendix B to make specific reference to the Powys Well-being Assessment.</p> <p>The objectives of the Replacement LDP are being developed and will be included and assessed as part of the next stage of the ISA process. The Powys Well-being Assessment has been referred to throughout the baseline evidence and will inform the Powys Well-being Plan, which will be published in May 2023. The findings of the Well-being Assessment will be used to set out well-being objectives and the Replacement LDP will be aligned with these objectives. The Powys Well-being Assessment, albeit not a plan in itself,</p>



id	Respondent	Summary	Response/Action
			will be referred to in Appendix B to the report.
89	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Section 4.2.11 (Page number 129)</p> <p>Issue: Site allocations</p> <p>Comment: This section states that ~the Council will screen out sites based on high level constraints and conformity with the preferred spatial strategy and ISA Objectives, published within the Candidate Sites Assessment Methodology.</p> <p>We have received another consultation on the Candidate Site Assessment Methodology Consultation Draft document to which we will respond separately. However, we note there are inconsistencies between the 15 ISA objectives questions/criteria listed in this document and the ones within the Candidate Sites Assessment Methodology.</p>	<p>The Candidate Site Assessment Methodology (CSAM) and the ISA process are separate but complementary frameworks, the latter applied following the use of the CSAM to filter out proposed sites which do not meet specified criteria. These sites are subsequently considered against the ISA Site Assessment Framework to test their performance as reasonable alternatives within the specific parameters of the statutory ISA process which tests the LDP as a whole. The development of a separate framework for assessing sites to include more location specific criteria follows the advice within national planning guidance.</p>
90	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Appendix F (Page number F1)</p> <p>Issue: Proposed ISA Site Appraisal Framework</p> <p>Comment: The site appraisal framework should enable the answering of four initial identified key questions. The first question asks: Is the site in a sustainable location in accordance with the site search sequence set out in Planning Policy Wales 11 (PPW)?</p>	<p>These questions are derived directly from the Development Plans Manual page 40. They are phrased in fashion which enables them to act as a framework for more detailed criteria-based consideration of suitability. As such it would be inappropriate to include detail which privileges one topic over</p>

id	Respondent	Summary	Response/Action
		<p>We would like to point out that section 3.30 of PPW makes clear reference to the adoption of SMNR principles within the plan. We also advise that it should be in line with the aims and objectives of the Mid Wales Area Statement, and this should be captured by the question.</p> <p>The second question asks: - Is the site generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution? The reference to biodiversity and landscape is very generic. We would welcome the addition of the following matters as a means of flagging potential adverse significant effects from candidate sites:</p> <ol style="list-style-type: none"> <li>1. Within or likely to affect the national site network sites and Ramsar sites [aligned with findings of HRA].</li> <li>2. Within or likely to affect a site of special scientific interest; or is within a consultation area around a SSSI notified to the LPA by NRW. [1 and 2 aligned with any HRA / other findings of assessments of air quality impacts on designated conservation sites: Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report   JNCC Resource Hub].</li> <li>3. Within or likely to affect National Nature Reserves (NNR) [within 1000m].</li> <li>4. Likely to affect European Protected Species (EPS) / nationally fully protected species protected under the Wildlife &amp; Countryside Act [Survey/ LERC (Local Environmental Records Centres) records of EPS/WCA protected species and birds within reasonable proximity of the candidate site].</li> <li>5. Likely to affect the purposes of National Parks or Areas of Outstanding Natural Beauty [Designated landscapes within 2000m (homes)/ 10,000m (industrial or energy generation and distribution)].</li> <li>6. Flood Map for Planning [aligned with findings of SFCA].</li> <li>7. Involving groundworks and/or non-mains foul or surface water disposal within Source Protection Zones, Nitrate Vulnerable Zones, or defined water</li> </ol>	<p>others.</p> <p>The suggested criteria are considered within individual ISA Site Appraisal criteria (Objective 14 and Objective 15)</p> <p>Reference to NNR added.</p>

id	Respondent	Summary	Response/Action
		<p>protection zones.</p> <p>8. Involving groundworks upon historic closed landfills or within 250m of an active open landfill.</p>	
91	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Appendix F (Page number F4)</p> <p>Issue: ISA Objective 5 To Improve the health and well-being of all sectors of society</p> <p>Comment: We note the two site appraisal questions for this objective try to encompass the aims of other relevant and more specific five questions that have been identified for the same objective within the section 4 of the report.</p> <p>We suggest you modify the questions wording as such:</p> <ul style="list-style-type: none"> <li>- Is the site located so as to encourage health and wellbeing including access to healthcare, physical activity, active travel, natural green space, community interaction and engagement?</li> <li>- Could the site contribute to the provision of facilities, including green infrastructures, which promote health and well-being?</li> </ul> <p>The importance for local communities to have access to green public spaces for health and wellbeing has not been captured by the Appraisal Criteria which focuses purely on proximity to GP surgeries. We suggest distance from green public spaces and how they connect to the development site should also be considered.</p>	<p>The questions and criteria for ISA objective 5 have been reviewed in order to capture health facilities more generally and to include sports facilities, active travel routes, and accessible natural or semi-natural greenspace.</p> <p>Amendments to Appendix F ISA Site Assessment Framework in relation to ISA Objective 5 to capture provision or accessibility to a wider range of health related facilities.</p>
92	<p>Natural Resources Wales - Mid Region (Strategic</p>	<p>Appendix F (Page number F5)</p> <p>Issue: ISA Objective 6: To make the best use of previously developed land and existing buildings and protect higher grade agricultural land</p>	<p>The wording of this objective amended to refer to previously developed land, rather than brownfield land, for consistency with the term used in Planning Policy Wales. The definition of</p>

id	Respondent	Summary	Response/Action
	Policy and Planning) [688]	<p>Comment: The objective is clearly designed to protect higher grade agricultural land and direct development to brownfield land. However, the criteria does not consider whether brownfield land has other constraints associated with it that need further consideration under other objectives. There is scope for improving the wording of higher score to: The site is entirely brownfield land and is within or on the edge of an existing settlement and does not have a high biodiversity value.</p>	<p>previously developed land according to PPW excludes sites of nature conservation value. Objective 14 and site assessment criteria addresses biodiversity protection including priority habitats and species identified in the Powys Nature Recovery Action Plan.</p> <p>Amended text in Appendix F under iSA Objective 6 to refer to previously developed land to match the definition provided by Planning Policy Wales.</p>
93	Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]	<p>Appendix F (Page number F7)</p> <p>Issue: ISA Objective 10 - To support the resilience of Powys to the potential effects of climate change, including flooding and other extreme events</p> <p>Comment: The objective aims to secure Powys' resilience against the effects of climate change, and yet the supportive question purely refers to flood risk and no other risks related to loss of environmental assets such as woodland, peatland and other important wildlife habitats that would adversely impact on climate resilience if affected by development. There is also no focus on key design aspects of development that would make a project more environmentally friendly. The appraisal criteria would benefit from inclusion of statements such as:  - Development at the site to improve and extend green infrastructure networks to support climate change adaptation.  We refer you to the WG ambition and commitment to create a connected National Forest for Wales.</p>	<p>The questions and criteria for ISA Objective 10 relating to climate change will be amended to include reference to green infrastructure networks. Consideration of the use of green architecture principles will be determined as part of a proposed site design. Site assessment criteria amended to include reference to green infrastructure networks. The National Forest for Wales has been identified as a relevant document in Appendix B of the report.</p> <p>Additional text inserted under ISA Objective 10 relating to climate change adaptation to refer to improving and extending green infrastructure networks.</p>

id	Respondent	Summary	Response/Action
		<p>- The development increases resilience to the effect of climate change through the good use of green architectural design.</p>	
94	<p>Natural Resources Wales - Mid Region (Strategic Policy and Planning) [688]</p>	<p>Appendix F (Page number F9)</p> <p>Issue: ISA Objective 14 : To conserve and enhance biodiversity and geodiversity and promote improvements to the multifunctional green infrastructure network</p> <p>Comment: The red score 00 appraisal criteria for this objective states: The site intersects or is adjacent to an internationally (SAC, SPA,Ramsar) or nationally (SSSI, Ancient Woodland)designated site. We would like to point out that detrimental impact on protected sites is not limited to development which 'intersects or is adjacent to' any such site. Depending on the nature of the development and the features of the site affected, detrimental impact can occur at much higher distances. This is particularly true for developments affecting levels of nutrient deposition (ammonia and nitrates) and mobile species such as breeding and overwintering birds at designated sites.</p>	<p>Amendments made to Appendix F ISA Objective 14 site appraisal criteria to reflect the possibility of wider effects on designated sites and priority habitats/species.</p>
<b>INTRODUCTION TO THE ISA</b>			
2	<p>Clwyd-Powys Archaeological Trust (Mark Walters, Development Control Archaeologist ) [210]</p>	<p>Do you agree with the proposed approach to the ISA of the Local Development Plan? Yes</p>	<p>Comment noted</p>

id	Respondent	Summary	Response/Action
3	Clwyd-Powys Archaeological Trust (Mark Walters, Development Control Archaeologist ) [210]	Do the ISA objectives and guide questions that comprise the ISA Framework cover a sufficient range of environmental, social, cultural and economic topics? Yes	Comment noted
12	Comisiynydd y Gymraeg	<p>Cynllun Datblygu Lleol Newydd Powys – Ymgynghoriad ar y Prosesau Asesu</p> <p>Diolch am y cyfle i gymryd rhan yn yr ymgynghoriad hwn, wrth i'r Cyngor ddechrau paratoi ei</p> <p>Gynllun Datblygu Lleol (CDLI) newydd. Bydd ein sylwadau yn canolbwyntio ar faterion yn ymwneud â'r Gymraeg yng nghyd-destun y Fframwaith Arfarnu Arfaethedig a'r Arfarniad o Gynaliadwyedd Integredig.</p> <p>Cefnogwn Amcan 4 y Fframwaith, sef “Gwarchod, hyrwyddo a gwella'r iaith Gymraeg a'i diwylliant”, sydd yn ei dro yn cefnogi'r Nod Llesiant Cenedlaethol, “Cymru â diwylliant bywiog lle mae'r Gymraeg yn ffynnu”. Nodwn fod pedwar cwestiwn ar gyfer asesu polisiâu yn erbyn Amcan 4. Rydym yn cefnogi'r ystod eang o ffactorau a ystyrir, o gyfleoedd i hyrwyddo a datblygu'r Gymraeg, cynaliadwyedd cymunedau Cymraeg, addysg Gymraeg a dysgwyr Cymraeg o bob oedran, i wasanaethau Cymraeg o bob math.</p> <p>Yn ogystal â'r cwestiynau uchod, gofynnwn i'r Cyngor sicrhau fod yr Arfarniad o Gynaliadwyedd Integredig yn ystyried Cynllun Strategol Cymraeg mewn Addysg (CSGA) 2022-2032. Nodir yn y CSGA bod “cyfle hefyd i sicrhau bod datblygu addysg cyfrwng Cymraeg yn ganolog i holl</p>	<p>Nodwyd y gefnogaeth.</p> <p>Dyfynnir Strategaeth Hybu'r Gymraeg (2017-22) a'r diweddariad sydd ar ddod (2023-27) ar dudalen 59 fel rhan o'r ystyriaeth o'r Gymraeg. Pan fydd y diweddariad ar gael, gellir diwygio'r Adroddiad Cwmpasu a'r Arfarniad o Gynaliadwyedd Integredig yn unol â hynny, cyn y cyflwynir y CDLI.</p> <p>Bydd Cynllun Strategol y Gymraeg mewn Addysg (Cyngor Sir Powys, Medi 2022 - Awst 2032) yn cael ei ystyried gan y polisiâu yn y CDLI Newydd, gyda'r Arfarniad o Gynaliadwyedd Integredig yn gwerthuso effeithiau tebygol drwy Amcanion yr Arfarniad o Gynaliadwyedd Integredig sy'n cynnwys cyfeirio at ddiogelu a hyrwyddo'r Gymraeg drwy amrywiol ffyrdd, gan gynnwys addysg.</p>

id	Respondent	Summary	Response/Action
		<p>bolisiâu a strategaethau'r Cyngor ar draws pob maes gwasanaeth, gan gynnwys Cynllun Datblygu Lleol Powys". Dylai CDLI newydd y Cyngor hyrwyddo amcanion y CSGA.</p> <p>Dylai'r Arfarniad hefyd ystyried Strategaeth Hybu'r Gymraeg 2017-2022 a luniodd y Cyngor yn unol â'r safonau hybu a osodwyd arno. Un o feysydd blaenoriaeth y strategaeth yw "Dylanwadu ar symudiadau poblogaeth", sy'n cynnwys yr amcan canlynol: "Edrych ar gamau pwrpasol i ddylanwadu'n gadarnhaol ar bolisi tai a chynllunio, gan sicrhau fod asesiadau effaith ieithyddol yn cael eu gweithredu fel rhan o'r broses gynllunio". Dylai'r Cyngor egluro sut y bydd y CDLI yn cyfrannu at gyrraedd y targed a bennir yn y strategaeth ar gyfer cynyddu neu gynnal nifer y siaradwyr Cymraeg yn yr ardal. Nodwn fod y strategaeth bresennol yn agosáu at ddiwedd ei chyfnod. Dylai CDLI newydd y Cyngor hyrwyddo amcanion a tharged y strategaeth newydd pan gaiff ei llunio.</p> <p>Gobeithiwn y bydd y sylwadau hyn o ddefnydd wrth i chi baratoi'r CDLI. Mae croeso i chi gysylltu petai chi'n dymuno trafod y materion uchod ymhellach.</p>	<p>Yn y cyfamser, comisiynwyd IAITH Cyf gan Gyngor Powys i adolygu elfennau o ran yr iaith Gymraeg yn yr Adroddiad Cwmpasu. Gwnaed nifer o argymhellion, gan gynnwys diwygiadau i'r Amcanion a'r meini prawf asesu, a chafwyd eu hymgorffori yn fersiwn gyfredol yr Adroddiad Cwmpasu. Mae adroddiad iaith Cyf ar gael ar wahân.</p>
12	Welsh Language Commissioner [1203]	<p>We support Objective 4 of the Framework, that is To protect, promote and enhance the Welsh language and culture, which in turn supports the National Well-being Goal, A Wales of vibrant culture and thriving Welsh language. We note that there are four questions for assessing policies against Objective 4. We support the wide range of factors considered, from opportunities to promote and develop the Welsh language, the sustainability of Welsh-speaking communities, Welsh-medium education and Welsh learners of all ages, to Welsh language services of all kinds.</p> <p>In addition to the questions above, we ask the Council to ensure that Integrated Sustainability Appraisal considers the 2022-2032 Welsh in Education Strategic Plan (WESP). It is noted in the WESP that there is also</p>	<p>Support noted.</p> <p>The Welsh Language Promotion Strategy (2017-22) and forthcoming update (2023-27) is cited at p.59 as part of the consideration of the Welsh language. When the update is available, the Scoping Report and ISA can be revised accordingly, in advance of the submission LDP.</p>

id	Respondent	Summary	Response/Action
		<p>an opportunity to ensure that the development of Welsh-medium education is central to all Council policies and strategies across all service areas, including the Powys Local Development Plan. The Council's new LDP should further the objectives of the WESP.</p> <p>The Appraisal should also consider the 2017-2022 Welsh Language Promotion Strategy which the Council produced in accordance with the promotion standards imposed on it. One of the priority areas of the strategy is to Influence population movements, which includes the following objective: Look at appropriate steps to positively influence housing and planning policy, ensuring linguistic impact assessments are conducted as part of the planning process. The Council should explain how the LDP will contribute to meeting the target set in the strategy for increasing or maintaining the number of Welsh speakers in the area. We note that the current strategy is nearing the end of its term. The council's new LDP should promote the objectives and target of the new strategy when it is drawn up.</p>	<p>The Welsh Education Strategic Plan (Powys County Council, September 2022 – August 2032) will be taken into account by policies in the Replacement LDP, with the ISA appraising likely effects through the ISA Objectives which include reference to the protection and promotion of the Welsh language through various means, including education.</p> <p>Meanwhile, IAITH Cyf. was commissioned by Powys Council to review the Welsh language components of the Scoping Report. Numerous recommendations were made, including revisions to Objectives and assessment criteria, which were incorporated into the current version of the Scoping Report. IAITH Cyf's report is available separately.</p>
23	Newtown & Llanllwchaiarn Town Council (Mrs Ffiona Ferneyhough, Development Officer) [1205]	We support the approach of the Consultation and welcome the fact that the important community considerations such as Health & Wellbeing, Culture & Heritage, which may previously have fallen outside of the 'traditional' planning process.	Support noted.



id	Respondent	Summary	Response/Action
34	Mineral Products Association Wales (Director) [595]	Whilst in general we are supportive of the approach outlined, it is important that the proposed policy application becomes more robust in areas such as minerals safeguarding. Our concerns are detailed in Appendix 1. Note: Appendix 1 provides a copy of the representation made in response to the consultation on the Review Report in January 2022.	Reference to policy development noted - to be considered against ISA as the LDP emerges.
96	Mineral Products Association Wales (Director) [595]	<p>Again, our response to this would be generally supportive, however, with reference to specific objectives, we seek greater clarity on how the council will deliver its aspirations. We trust this will be addressed in the plan and the supporting evidence base.</p> <p>ISA Objective 1: - The Council must ensure proposed allocations fully reflect Minerals Safeguarding Areas and ensure mineral resources are not needlessly sterilised through lack of robust consideration in both the development plan and development management processes.</p> <p>The Council must also give due regard to the RTS 2nd Review and any associated SSRC. The evidence base for the RTS is developed around mineral reserve figure from December 2016. The Council should there give due consideration to updating the reserve evidence base which should be considered in light of future development aspirations. The Council will also need to consider local vernacular and ensure local materials are deliverable to maintain design standards.</p> <p>Objective 2: - See above comment</p> <p>Objective 3: - No additional comments</p> <p>Objective 4: - No additional comments</p>	<p>Objective 9 guide question amended to:</p> <ul style="list-style-type: none"> <li>• Will the policy or proposal Safeguard mineral resources?</li> </ul> <p>Para 3.11 states: Powys contains many material assets of national and regional importance which should be safeguarded. These include mineral resources, strategic transport and utilities infrastructure and location specific infrastructure as well as waste facilities and soils.</p>

id	Respondent	Summary	Response/Action
		<p>Objective 5: - Restored quarries provide excellent opportunities for nature conservation and public access, where appropriate, for health and well being. The industry will continue to deliver high quality restoration.</p> <p>Objective 6: - No additional comments</p> <p>Objective 7: - There may be opportunity for restored quarries to be used to deliver long term water storage options.</p> <p>Objective 8: - The minerals industry continues to control emissions to air in accordance with best practice. It is important to remember that minerals can only be worked where they are found.</p> <p>Objective 9: - We are again generally supportive of the objective, including Promoting the use of locally sourced sustainable materials? however it is unclear what is meant by Create opportunities to safeguard protected mineral resources? National policy is not about creating opportunities to safeguard mineral resources but actually safeguarding resources from unnecessary sterilisation.</p> <p>Objective 10: - The minerals industry remains committed to addressing the effects of climate change. A sustainable minerals supply will be critical in addressing climate change through the delivery of green energy infrastructure.</p> <p>Objective 11: - The minerals industry is committed to meeting climate change objectives</p> <p>Objective 12: - Again, the mineral industry is committed to meeting climate change targets, however, in terms of land use, minerals can only be worked</p>	

id	Respondent	Summary	Response/Action
		<p>where they occur. The use of EVs and alternative fuels for quarry plants is dependent upon manufacturers with whom the industry is working closely with.</p> <p>Objective 13: - Local vernacular will be dependent upon a sustainable source of local building materials.</p> <p>Objective 14: - The industry will continue to deliver appropriate biodiversity enhancement and net benefit.</p> <p>Objective 15: - The temporary use of land associated with minerals development will continue to manage landscape impacts through appropriate short-term mitigation and longer term management and enhancement</p>	
37	Cadw [1211]	The ISA scoping identifies the Historic Environment as a topic, along with the key issues. It also states that one of the ISA objectives (No.13) is "To preserve and enhance the Powysâ€™ heritage resource, including built and archaeological assets" and poses questions to consider in the ISA.	Comment noted
102	Cadw [1211]	An ISA produced following this scoping will properly consider the impact of the proposed Powys RLDP on the historic environment.	Comment noted



Kings Orchard  
1 Queen Street  
Bristol  
BS2 0HQ

**wsp.com**

WSP UK Limited makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out in the contract under which it was supplied.