



**Consultation on Draft Local Development Plan (LDP) Supplementary Planning Guidance documents:**

**Built Environment and Design, Nature Conservation, Renewable Energy, Car Parking Standards, Transport Assessments**

**Consultation Representation Form**

**Guidance Note**

Ceredigion County Council has agreed to publish draft Supplementary Planning Guidance (SPG) on Built Environment and Design, Nature Conservation, Renewable Energy, Car Parking Standards and Transport Assessments. The consultation period runs **from Thursday 17<sup>th</sup> July 2014 until midday on Friday 26<sup>th</sup> September 2014**. When commenting:

- Please use black ink/typescript and block capitals;
- Please do not attach any accompanying documents to this form with staples and no submissions on paper larger than A3;
- This form may be photocopied if necessary. It is also available on the Council website at: <http://www.ceredigion.gov.uk/ldp>
- **Where a group shares a common view on draft SPG, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point.** In such cases the group should indicate how many people it is representing and how the representation has been authorised (including a single point of contact for future correspondence); and
- All forms/comments must be received no later than **Midday on Friday 26<sup>th</sup> September 2014**.

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ML/

Date Received Stamp	Late
	Yes <input type="checkbox"/> No <input type="checkbox"/>

<b>Section: 1 Personal Details (or Client's details)</b>	<b>Section: 2 Agent's Name and Address (if applicable)</b>
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Organisation Representing <b>THE CAMBRIAN MOUNTAINS SOCIETY (CMS) REG. CHARITY NO. - 1113037</b>	
Signature	Date <b>23<sup>RD</sup> SEPTEMBER2014</b>

### Section 3: – Details

**CMS HAS A MEMBERSHIP OF AROUND 300 AND THIS REPRESENTATION HAS BEEN AUTHORISED BY THE SOCIETY'S TRUSTEES.**

### Section 4: – Draft Supplementary Guidance (SPG) You Wish To Comment On: (Please delete as appropriate) Please use a separate sheet for each SPG

**RENEWABLE ENERGY**

### Section 5: Your Comments

Please set out your comments below using additional sheets as necessary.

Your comments should be set out in full, referencing the **page and paragraph number from the draft SPG** this will help the Authority to understand the context of the issues you raise.

Please indicate if you are submitting other material to support your comments. **NONE.**

As a community organisation whose vision is focused on the conservation and, where appropriate, enhancement of the landscape making up the Cambrian mountains CMS values this opportunity to comment on Ceredigion CC's draft renewable energy SPG.

CMS broadly supports the draft SPG in that it helps to set the ground rules for siting all small to medium scale renewable energy projects within Ceredigion. CMS commends the Authority's LDP team in formulating such comprehensive guidance and it considers that all interested parties will find it useful. The Society especially notes **section 11, starting page 44**, in which the Authority states the importance of all aspects of the County's rich mix of landscapes. With CMS's particular interest in SLAs 12 & 13 (Ceredigion uplands) it sees this guidance, together with the Authority's SPG covering special landscape areas, as a very positive move in protecting the County's most outstanding landscapes.

Leading on from this the Society sees the advice in the SPG covering the visual cumulative effects of wind turbine developments as very helpful. CMS notes that the LDP team have taken advice from the work of Scottish Natural Heritage (SNH) on cumulative effects of wind turbine developments and that this advice is regarded as 'best practice' **(table 1, page17, row 8)**. In the SPG combined cumulative effects are well covered but successive effects in which the viewer may take a full 360° panorama needs further work. The Society also considers that sequential effects deserve more attention in that travelling around a county pepper potted by wind turbines will do little for residents' state of wellbeing (or the visitor economy). The Society is also aware that Natural Resources Wales, NRW, is taking an increasing interest in the cumulative impact of wind turbines across Wales and that the LDP team might consult further with the agency.

Whilst CMS is primarily concerned with the landscape quality of the Cambrian Mountains it is fully aware that a major element of the 'Cambrians' splendour is attributable to their biodiversity as well as range of habitats and ecosystems. As such CMS supports the Authority's concern over the **impacts of renewable energy technologies on the ecology of any development site (table 1, page 28, row 14 –wind, but also similar issues in solar and hydro tables)**.

The Society agrees that at least a Preliminary Ecological Appraisal, PEA, must be completed by the developer before any permission is granted. It is also very appropriate that developers should refer to the Authority's forthcoming SPG covering nature conservation.

CMS does not, however, desire Ceredigion's countryside be preserved in aspic, and it hopes that this SPG will assist in promoting a scaleable renewable energy infrastructure for the County. The Society considers that document's tables 1, 2 and 3, covering respectively wind, solar and hydro schemes clearly show issues that developers have to address in preparing their plans. The Society would, however, expect that the guidance in these tables is central to the planning process and not merely advice.

The Society would also like to point out some concerns it has over the SPG:

- Section 3, page 4 covering LU25 which states "adverse effects of a particular technology can be mitigated \_ \_". CMS believes that some renewable energy technologies are totally inappropriate in high value landscapes such as the Cambrian Mountains, cannot be mitigated for, and as such should not be granted planning permission.
- CMS notes that the Authority's SPG conforms to WG's Tan 8 policy document (section 5, page 6). Whilst the Society has doubts over much of Tan 8 it is encouraged that the SPG uses section 2.13 of that policy in stating categorically that planning permission for wind energy developments of between 5 and 50 MW outside SSAs will not be granted. The Society goes further and believes that the Authority should become much more assertive in its role as Statutory Consultant for larger renewable energy schemes which may potentially blight the County's high value landscapes.
- CMS also has concerns over the Authority's lack of emphasis for the precautionary principle when it comes to planning permissions under its control. A 0.05MW wind turbine with a tip height of 35m, now quite a common single turbine scheme, may stand out for several kilometres across a rolling upland landscapes. A 0.5MW photovoltaic array covering 1 hectare, about the area of a football pitch, built on an escarpment overlooking the coastal plain will resemble a huge factory roof. A micro-hydro scheme with a typical output of 0.1MW abstracts large volumes of water from a mountain stream as it cascades down from the Cambrian Mountains. All the above three scenes could well be in countryside that CCW's LANDMAP system, using any of its layers, places in high value landscape categories.
- CMS agrees with the Authority's 'issue to be addressed' as regards solar energy and its potentially dramatic effects on highly valued landscapes (table 2, page 64, row 9). CMS considers that in this row the Authority sets out its marker! The Society recommends that a similar strong marker, together with guidance, is included in the wind table, perhaps as an introduction to row 3 (table 1, page 12, row 3).

In conclusion, whilst CMS sees small scale renewable energy schemes playing a part in a rural community's wellbeing this should not be at the expense of the landscape! Ceredigion's rural community, just like 67% of the County's visitors (table 1, page 41, row 29) have a right to enjoy its outstanding countryside.

**Please return all completed forms to Planning Policy, Economic and Community Development Services, Neuadd Cyngor Ceredigion, Penmorfa, Aberaeron Ceredigion SA46 0PA, or by e-mail to [ldp@ceredigion.gov.uk](mailto:ldp@ceredigion.gov.uk) by no later than Midday on Friday 26<sup>th</sup> September 2014.**

**All information submitted will be available for public inspection and cannot be treated as confidential.**