



For Office Use	
LDP Representer No:	
Date received:	
Action: Acknowledgement /scanned:	

## Powys Local Development Plan (LDP) 2011-2026 Deposit Draft (July 2014)

### Deposit Stage Representation Form, July 2014

It is recommended that representations are made on this standard form or directly on-line at LDPWeb via [www.powys.gov.uk](http://www.powys.gov.uk) (Planning Policy/LDP pages).

Alternatively please complete Sections 1 and 2 of this standard form, it only needs to be done once, for Section 3 you will need to use a separate form for each representation that you wish to make and attach it to sections 1 and 2. Sections 5 and 6 contain questions regarding feedback and equalities and will only need to be completed once.

Send your completed form to:

**Powys LDP Team**  
**Spatial Planning and Built Heritage**  
**Powys County Council**  
**Neuadd Brycheiniog**  
**Cambrian Way**  
**Brecon LD3 7HR**

or email to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk)

Representations must be received by **4.30pm, Monday 8<sup>th</sup> September 2014.**

Please read the separate “**Guidance Notes on Making Representations**” before completing this form which will guide you through the process.

#### Section 1: Contact Details

	Your Details	Your Agent's Details (if applicable)
<b>Name:</b>	<b>Mrs. Ann West</b>  <b>Chairman of CMS.</b>	<b>Prof. Roger Earis</b>  <b>Secretary to CMS.</b>
<b>Organisation/Company:</b>	<b>The Cambrian Mountains Society (CMS). A registered charity (No.1113037) with a membership of 300.</b>  <b>The completion of this representation form has been authorised by the Society's Trustees.</b>	<b>The Cambrian Mountains Society</b>
<b>Address:</b>	<b>The Vron, Cregrina, Powys.</b>	<b>Pantymfedwen, Pontrhydfendigaid, Ystrad Meurig,</b>

For Office Use	
Representation Ref. No:	
Date received	

<b>Postcode:</b>	<b>LD1 5SF</b>	<b>Ceredigion. SY25 6ES.</b>
------------------	----------------	----------------------------------

*Please note that information provided in Sections 1, 3 and 4 will be made publicly available. Further personal information (as provided in Section 2) will be treated confidentially.*

## **Section 2: Further Personal Information**

(See “Guidance Notes on Making Representations”)

	<b>Your Details</b>	<b>Agents Details (if applicable)</b>
<b>Name:</b>	<b>Mrs. Ann West</b>	<b>Prof. Roger Earis</b>
<b>Tel:</b>	<b>01982 570244</b>	<b>01974 831491</b>
<b>Fax:</b>		
<b>Email:</b>	<b>chair@Cambrian-mountains.co.uk</b>	<b>roger@earis.plus.com</b>
<b>Signature:</b>		
<b>Date:</b>	<b>5th September 2014</b>	<b>5th September 2014</b>

\* Yes, I wish to be notified that the LDP has been submitted to Welsh Government for independent examination and/or of the adoption of the plan.

For Office Use	
Representation Ref. No:	
Date received	

**From this point onwards please use a separate representation form for each part of the plan you wish to make a comment on. All representations made will be available for the public to view.**

### **SECTION 3: Commenting on the Plan:**

**3a.** The Powys Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government.

It is the Inspector's job to consider whether the Plan is sound. There is no definition of 'sound' but in this context we use its ordinary meaning of 'showing good judgement' and 'able to be trusted'.

The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are in the Guidance Notes on Making Representations accompanying this form, it may help you to read them before you tell us what you think of the Plan and its policies.

Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound, or if you think that all or parts of it are unsound and needs to be changed.

**(i) I think the LDP is sound**

**(ii) I think the LDP is unsound and should be changed \***

**(iii)** If you think the plan does not meet one or more tests of soundness, please indicate below which test (s) it does not meet (see "**Guidance Notes on Making Representations**")

Notably CE1 in that **it is not**

"compatible with the development plans prepared by neighbouring authorities".

Linked to the above the LDP will then struggle to meet the test for soundness for the following criteria.

C1 – "policies and strategies relating to the area or to adjoining areas",

C2 – "regard to national policy",

and C3 – "regard to the Wales Spatial Plan".

For Office Use	
Representation Ref. No:	
Date received	

**3b. Which document are you commenting on:**

**Please tick one:**

- \* Powys Local Development Plan 2011-2026, Deposit Draft (July 2014) Written Statement
- Powys Local Development Plan 2011-2026, Deposit Draft (July 2014) Proposals Maps
- Sustainability Appraisal Report
- Strategic Environmental Assessment Report
- Habitat Regulations Assessment Report

**3c. Which part of the document are you commenting on?**

When making a comment or representation, it is important you tell us which part of the document you are commenting on. To make this easier a system of RefPoints (Reference Points) has been used. We have placed RefPoints in the document which look like this: [®9.12](#) (An ® symbol followed by a number). If you want to make a general comment about the whole document, or to point out something which has been omitted, please use the first RefPoint in the document.

Further information can be found in the “**Guidance Notes on Making Representations**”. Please remember to use one form per representation.

RefPoint

[®16.1](#)

and / or

Policy Number

and / or

For Office Use	
Representation Ref. No:	
Date received	

Paragraph or section number

and/or

The Proposals Map

**Section 3d: Your Comments and Suggested Changes**

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

If you want changes made to the Plan, please be specific. For example, if you want new text or a policy added, please set out the new text or policy and explain where it should go in the plan.

If you want changes to the plan, we will assume you do not consider the Plan to be sound. However, please note that it is not the role of the Inspector to make an acceptable plan better.

If you do not consider the Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the plan to meet one or more tests of soundness, please tell us which one(s).

Your comments should be set out in full. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

**i) Does your representation request the addition of a:**

a) New Site (see 3e below)

b) New Policy

\*

c) New Paragraph or new text

d) Other

**ii) Please use the space below to set out your representation:**

**The Cambrian Mountains Society (CMS) thanks Powys CC for this opportunity to comment on the Deposit LDP. The Society’s comments are general in nature and as such fall under reference point 16.1 but throughout the representation references will be made to other parts of the documentation. The Society’s major concern with the LDP is that it does not follow local, national or international ideas on sustaining and enhancing areas of high value landscapes.**

For Office Use	
Representation Ref. No:	
Date received	

CMS supports the Authority's Vision for Powys 2026 (ref 16.5). As the County sits in the 'green heart of Wales' CMS sees great value in 'celebrating, protecting, enhancing and making the most of its natural resources, native wildlife and habitats, heritage and distinctive characteristics.' The Society, however, is very concerned that this vision statement does not specifically draw out the outstanding landscapes within the County. Linked to this, the Society is also worried that the LDP objectives, in particular the Natural and Built Assets Objective 13 (ref 16.9) fails to give sufficient weight in protecting the County's high value landscapes.

It is well known to PCC that CMS's preferred option for the Cambrian Mountains is to have the area designated as an Area of Outstanding Natural Beauty (AONB). Details of the Society's vision for the Cambrians can be found on its website: [www.cambrian-mountains.co.uk](http://www.cambrian-mountains.co.uk), navigating through the menu to 'AONB campaign.' As such the Society would hope that Powys' LDP has the flexibility to include further protected landscape designations. Although CMS's focus is on the Cambrians it would also point out that other areas of outstanding landscape quality are found in Powys and deserve more recognition. That the Authority is fully aware of such areas is evident from the topography map on page 7 of the Deposit with the Berwyns, Radnor Forest, Eppynt, as well as the Cambrian Mountains pinpointed. In CMS's opinion all these areas are worthy of at least Special Landscape Area status (SLA) and the LDP should have in place Special Planning Guidance (SPG) to facilitate their protection. The SPG/SLA combination should help to inform all those concerned of the special qualities of each area and how any planning proposals might enhance not harm the area's special qualities. The Society notes that the LDP does make special mention of the Montgomery Canal as an outstanding feature within the County, and suggests that it too could join the aforementioned areas as an SLA, albeit a very linear one.

That a strong landscape policy is an important element of any public administration's remit is clearly expressed by the European Landscape Convention:

'Landscape policy means an expression by the competent public authorities of general principles, strategies and guidelines that permit the taking of specific measures aimed at the protection, management and planning of landscapes'

European Landscape Convention, Article 1b (2000)

The use of designations such as SLAs for areas of high landscape value have been used extensively in the land use planning system in the UK. Indeed in Edition 3, July 2010 of Planning Policy Wales the Welsh Assembly Government make it a requirement of local authorities to review the need for designation of SLAs. Previous to this, in response to WG's concern for special landscapes, CCW, an NRW legacy body, produced guidance note No. 1- Landmap and Special Landscape Areas – June 2008. Within both of these documents the Geographical Information System (GIS) Landmap is strongly promoted as a formal scientific assessment tool that local authorities are advised to use in preparing SPGs concerning SLAs. Natural Resources Wales (NRW) still clearly see the benefits of SLA status:

'Special Landscape Areas are a non-statutory designation applied by the local authority to define areas of high landscape importance within their administrative boundary. Areas of high landscape importance may be designated for their intrinsic physical, environmental, visual, cultural and historical value in the contemporary landscape.'

NRW (2013 page 3)

It is of little use saying – all our county is of high landscape value, we do not need SLAs. This stance does little to protect the county's most valued countryside. Para 13, page 39 of the Deposit states; '*The landscape of Powys is extremely diverse and includes upland landscapes and valleys that are scenically and historically important. Development which impacts on the landscape must*

For Office Use	
Representation Ref. No:	
Date received	

*be carefully managed and appropriately designed particularly in terms of visual impact.* Surely this paragraph alone points toward the implementation of SLAs!

In producing their LDPs neighbouring local authorities such as Carmarthenshire and Ceredigion have designated SLAs with linked SPGs. Carmarthenshire's SPG for Special Landscape Areas discusses the dilemma that whole of the county's landscape may be regarded as of outstanding quality. It moves on to how the authority successfully used Landmap's layering system, particularly focusing on the visual and sensory layer, to delineate a family of SLAs. Use was also made of CCW's Wales Tranquil Areas Map 2009 to help the authority in identifying 19 SLAs three of which are in the Cambrian Mountains. Notably the authority designated Mynydd Mallaen as an SLA to complement its status as a Site of Special Scientific Interest (SSSI) and Special Protected Area (SPA).

Ceredigion CC, as part of their LDP, has also produced what CMS regard as a very thorough SPG celebrating the Special Landscape Areas within the county. The SPG is clearly laid out including a location map for each SLA and key policy and management issues for that area. Again the authority makes extensive use of Landmap which they state in their LDP, "provides the basis of a consistent Wales-wide approach to landscape assessment." The County now has 13 SLAs two of which recognise the importance of the Cambrian Mountains (SLA12 – Northern Uplands and SLA13 – Southern Uplands).

Ceredigion CC also has a Deposit SPG (2014) for Renewable Energy in which it considers impacts of projects on landscape. Notably it indicates that the special qualities of specific landscapes such as its SLAs will be material considerations when considering wind turbine proposals.' As regards to Powys' policy RE1 concerning renewable energy (ref [@16.92](#)) CMS would ask that Powys, like Ceredigion, puts in place an SPG which considers the impact of all renewable energy schemes, be they large or small scale, in areas of high landscape value. Obviously CMS is especially concerned about the industrialisation of the Cambrian Mountains. It seems unlikely that solar energy installations as discussed in para 4.10.10 (ref [@16.93](#)) will be built in upland high value landscapes but CMS would like to express its support for the authority's policy as regards such schemes. The Society is, however, concerned about the authority's blanket support for hydro power schemes of up to 5MW. Such schemes should not be permitted in high value landscapes without rigorous environmental impact assessments in order to assess their effect on riparian ecosystems.

CMS would also like to point out that the LDP pays little attention to the two prominent industries in the county namely agriculture and tourism. Both are mentioned on page 15 of the deposit document but it is the Society's opinion that these two industries, so important to the county's economy, be given more weight in the LDP. Especially in high value landscapes the LDP should encourage farm diversification to provide more visitor facilities. These may include accommodation but also recreational assets such as pony trekking stables, rural craft centres, and even dark skies observatories. Nor does the LDP give ecosystem services and the payments they may provide any attention. WG with its forthcoming Environment Bill is keen to promote the ecosystems approach, putting sustainability at the heart of all its work.

Moving to the end of the Deposit document and referring to Appendix 2 (ref [@16.107](#)) concerning the provision of SPGs, CMS suggests that the Landscape SPG be changed to the SLA SPG. This will bring it in line with the recommendations above as regarding the designation of these high value landscapes.

Finally, CMS's preferred option for the Cambrians continues to be AONB designation, but it sees the setting-up of a network of SLAs across all three counties covering the Cambrian Mountains as a very positive move in safeguarding this unique landscape at the heart of Wales.

For Office Use	
Representation Ref. No:	
Date received	

iii) Please use the space below to say what changes (if any) you would like to be made:

Reviewing all the recommendations made in the above representation, in order to help the Powys LDP sit in more comfortably with a Wales-wide approach. Notably taking into account the following organisations' work in maintaining and enhancing areas of high landscape value.

- WG guidance,
- NRW advice,
- neighbouring counties' provision of SLAs together with their SPGs.

<b>For Office Use</b>	
Representation Ref. No:	
Date received	

**Please continue on a separate sheet if required:**

For Office Use	
Representation Ref. No:	
Date received	

**Section 3e: Site Allocation Representations**

i) **Is your representation referring to (tick all that apply):**

- (a) Adding a new site                      (b) Amending a site                      (c) Deleting a site

ii) **Was the site submitted as part of the candidate site process? If so, please give the Candidate Site name and Number (if known)**

a) Site Name

b) Site Reference (e.g P01 HA1)

**If you did not submit the site previously as a candidate site, please provide the following details:**

- A plan of the site you wish to be considered with your Representation form. This must be an Ordnance Survey Based Map, outlining the land for consideration in RED.
- Documentation that the site accords with the LDP's strategy and that the plan would be sound if the site is included.
- Evidence that you have used a consistent methodology in assessing the site. It is advised that you follow the Authority's Candidate Site Methodology, this can be found on the Council's website.
- You will also need to test the sustainability effects of the site. This is called Sustainability Appraisal / Strategic Environmental Assessment. See guidance note for more information.

For Office Use	
Representation Ref. No:	
Date received	

**Section 4: After making your representation**

At this stage, you can only make comments in writing (these are called 'written representations').

However everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public Examination.

However you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

**a) Do you want your comments to be considered by “written representations” or do you want to speak at a hearing session of the public examination? (Please tick one of the following):**

- i) I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector
- ii) I want to speak at a hearing session

\*

**b) If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the hearing**

The representation concentrates on the provision of SLAs with a linked SPG document and it is this that CMS would like to speak to.

At a hearing session the Society would expand on details of a Cambrian Mountains SLA. For instance we would detail it's;

- boundaries,
- landscape qualities and features,
- key policy and management issues.

I am enclosing further information on separate page/s.

Signed .....Dated.....

**THANK YOU FOR YOUR COMMENTS**

Forms should be returned to: LDP Team, Spatial Planning and Built Heritage, Powys County Council, Neuadd Brycheiniog, Cambrian Way, Brecon, LD3 7HR or emailed to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk) .

<b>For Office Use</b>	
Representation Ref. No:	
Date received	

The closing date for representations is 4.30pm, **Monday 8<sup>th</sup> September 2014**. Representations received after this date will not be considered.

For Office Use	
Representation Ref. No:	
Date received	

## Section 5: CUSTOMER FEEDBACK MONITORING

Please complete Section 5 and 6 once only. It is only for section 3 that you will need to use a separate form for each representation that you wish to make.

Section 5 is designed to help us find out if the Council is delivering a satisfactory service to you, the customer.

**All questions are *optional*. Please leave blank any that you prefer not to answer.**

1. **Did you speak to a member of the LDP Team before submitting your representation (s)?**  
 **Yes**
  
2. **How satisfied were you with the information provided and assistance given to you?**  
 Fairly satisfied
3. **How satisfied are you with information available on the Powys website referring to the Deposit LDP?**  
 Fairly satisfied
  
4. **Did you attend one of the LDP exhibitions? If you did how satisfied are you with the information presented and how questions were answered.**  
 Fairly dissatisfied
  
5. **How easy did you find it to complete the representation form.**  
 Difficult
6. **How easy did you find it to submit your comments through LDPWeb.**  
 Not applicable representations were submitted in paper format / email.
  
7. **As we are continually monitoring and improving our services, we would appreciate any suggestions or comments you may have that you believe would help improve our services to you.**

The provision of paper copy in libraries which can be loaned out on a short term, say overnight, basis. Reading large scale documents on screen is difficult and just viewing copy in a library very limiting.

For Office Use	
Representation Ref. No:	
Date received	

8. Overall, how would you rate the service you have received?

Fairly satisfied

For Office Use	
Representation Ref. No:	
Date received	

## Section 6 – Equalities Monitoring

Powys County Council is committed to providing services which meet the needs of different types of people and to remove any barriers that exist. To achieve this, we need to gather information about who uses our services, and whether their needs are met. This will then assist in shaping the way that we design, manage and improve our services. We would therefore appreciate you taking just a few minutes to complete this information as part of that process.

All the information that you give us here, will be treated in the strictest of confidence, and, will be used only to provide data for statistical analysis and reporting.

**All questions are *optional*. Please leave blank any that you prefer not to answer.**

**This form is a group representation so the questions in this section are not applicable**

### 1. Gender

What is your gender?

Male  Female

### 2. Age

What is your age?

Under 16  16 – 17  18 – 19  20 – 24  25 – 34  
 35 – 44  45 – 54  55 – 64  65 – 74  75 or over

### 3. Disability

**3.1 Do you have any physical or mental health conditions, illnesses or impairments, lasting, or expected to last, 12 months or more<sup>1</sup> ?**

Yes  No  Don't know

**3.2 If you answered 'Yes' to question 3.1, does your condition, illness or impairment/ do any of your conditions, illnesses or impairments reduce your ability to carry out day-to-day activities?<sup>2</sup>**

<sup>1</sup> Note: In answering question 3.1, please include any sensory deficit, non temporary mobility problems such as dyspraxia and cerebral palsy, developmental conditions such as Autism and Asperger's syndrome, conditions associated with learning impairment such as Down's syndrome or dyslexia, difficulties associated with injury as well as common conditions and illnesses if they have lasted or are expected to last 12 months or more. Any seasonal conditions such as hay fever which recur and have lasted or are expected to recur in the future should also be included.

<sup>2</sup> Note: In answering questions 3.2 and 3.3 you should consider whether you are affected whilst receiving any treatment or medication for your condition or illness and/or using any devices such as a hearing aid, for example.

For Office Use	
Representation Ref. No:	
Date received	

- Yes, a lot     
 Yes, a little     
 Not at all

**3.3 Do you have any health conditions, illnesses or impairments which affect you in the following areas?  
Please choose ALL that apply.**

- Vision (for example blindness or partial sight)  
 Hearing (for example deafness or partial hearing)  
 Mobility (for example walking short distances or climbing stairs)  
 Dexterity (for example, lifting and carrying objects or using a keyboard)  
 Learning or understanding/concentrating (for example associated with Dyslexia or Down's syndrome)  
 Memory  
 Mental Health  
 Stamina or breathing or fatigue  
 Socially or behaviourally (for example, associated with autism, attention deficit disorder or Asperger's syndrome)  
 Other, please describe

#### 4. Pregnancy and Maternity

IF FEMALE: **Are you currently pregnant, or have you given birth within the past 26 weeks?**

- Yes, I'm pregnant     
 Yes, I've given birth within the past 26 weeks     
 No

#### 5. Language

**5.1 Can you understand, speak, read or write Welsh? Please choose ALL that apply.**

- Understand spoken Welsh  
 Speak Welsh  
 Read Welsh  
 Write Welsh  
 None of the above

**5.2 What is your main language?**

- English     
 Welsh     
 Other, please specify

#### 6. National Identity

**How would you describe your national identity? Please choose ALL that apply.**

- Welsh  
 English  
 Scottish  
 Northern Irish  
 British  
 Irish  
 Polish  
 Other, please describe

For Office Use	
Representation Ref. No:	
Date received	

## 7. Ethnicity

What is your ethnic group? Please choose **JUST ONE** of the 18 options below that best describes your ethnic group or background.

### White

- 1. Welsh/English/Scottish/Northern Irish/British
- 2. Irish
- 3. Gypsy or Irish Traveller
- 4. Any other White background, please describe

### Mixed / Multiple ethnic groups

- 5. White and Black Caribbean
- 6. White and Black African
- 7. White and Asian
- 8. Any other Mixed/Multiple ethnic background, please describe

### Asian / Asian British

- 9. Indian
- 10. Pakistani
- 11. Bangladeshi
- 12. Chinese
- 13. Any other Asian background, please describe

### Black / African / Caribbean / British

- 14. African
- 15. Caribbean
- 16. Any other Black/African/Caribbean background, please describe

### Other Ethnic group

- 17. Arab
- 18. Any other ethnic group, please describe

## 8. Sexual Identity

IF AGED 16 OR OVER: Which of the following options best describes how you think of yourself?

- Heterosexual or Straight
- Gay or Lesbian
- Bisexual
- Other
- Prefer not to say

## 9. Marital or same-sex Civil Partnership Status

IF AGED 16 OR OVER: What is your current marital or same-sex civil partnership status?

For Office Use	
Representation Ref. No:	
Date received	

- Single, that is, never married and never registered in a same-sex Civil Partnership
- Married
- In a registered same-sex Civil Partnership
- Other, please describe

## 10. Religion

What is your religion?

- No religion
- Christian (all denominations)
- Buddhist
- Hindu
- Jewish
- Muslim
- Sikh
- Any other religion, please describe

<b>For Office Use</b>	
Representation Ref. No:	
Date received	