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## Powys Local Development Plan (LDP) 2011-2026

### Further Focussed Changes Representation Form, October 2016

It is recommended that representations are made on this standard form. More copies are available at Powys Council offices and at local libraries where the Schedule of Further Focussed Changes is available for public inspection or online at [www.powys.gov.uk](http://www.powys.gov.uk) (Planning Policy/LDP pages).

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 on each Further Focussed Change that you wish to make and attach it to sections 1 and 2.

Send your completed form to:

**Powys LDP Team**  
**Planning Policy**  
**Powys County Council**  
**The Gwalia,**  
**Llandrindod Wells,**  
**LD1 6AA**

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

Representations must be received by **5.00 pm, Monday 21<sup>st</sup> November 2016**.

Representations at this stage must **only relate to the Further Focussed Changes**.

Representations should not propose further changes to the Deposit LDP 2015 or the Focussed Changes January 2016; any such representations will be disregarded as they should have been made during the earlier stages of the Plan preparation. Duly made representations will be forwarded to the Planning Inspectorate for consideration by the Inspector appointed to examine the soundness of the Plan.

### Group Representations

Where there are groups who share a common view on how they wish to see the LDP changed, it would be very helpful for the group to send a single representation which represents that view. (Repeating the same points numerous times will not add weight to the case being made). Groups should indicate how many people they represent and how the representation has been authorised. The group's representative should be clearly identified.

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Please note that information provided in Sections 2, 3 and 4 will be made publicly available. Personal information, as provided in Section 1, will be treated confidentially.

**Section 1: Personal Information** (This will not be publicly available)

	Your Details	Agents Details (if applicable)
<b>Name:</b>	<b>Prof. Roger Earis Chairman of the Cambrian Mountains Society (CMS) with a membership of some 370.</b>	<b>Mr. Peter Foulkes</b>
<b>Tel:</b>	<b>01974 831491</b>	<b>01650 511821</b>
<b>Fax:</b>		
<b>Email:</b>	<a href="mailto:chair@Cambrian-mountains.co.uk">chair@Cambrian-mountains.co.uk</a>	<a href="mailto:peter.foulkes249@btinternet.com">peter.foulkes249@btinternet.com</a>
<b>Signature:</b>		
<b>Date:</b>	<b>4<sup>th</sup> November 2016</b>	<b>4<sup>th</sup> November 2016</b>

**Privacy Statement**

Personal Data will be processed in accordance with the Data Protection Act 1988. We will only use the information for the purpose of the LDP process.

By submitting a representation, the following personal information may be placed in the public domain including publication on the Powys County Council website: Your name, organisation / company, address, and your representation.

All personal telephone numbers and email addresses will be treated as confidential.

Powys County Council accepts the following responsibilities for personal information recorded:

1. The information will only be used for the agreed reason and will be looked after securely.
2. The information will only be kept for as long as needed or to comply with statutory requirements and will then be securely destroyed.
3. If the information has to be shared with other agencies initial consent will be gathered at this point and explicit (signed) consent will be obtained by the service / department concerned as soon as possible. Unless we are obliged by law to disclose the information.

Detailed guidance can be found on our webpages – search Freedom of Information - or from the Information Management Team.

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## Section 2: Contact Details

	Your Details	Your Agent's Details (if applicable)
<b>Name:</b>	<b>Prof. Roger Earis</b>	<b>Mr. Peter Foulkes</b>
<b>Organisation/Company:</b>	<b>Cambrian Mountains Society</b>	<b>Cambrian Mountains Society</b>
<b>Address:</b>	<b>Pantymfedwen, Pontrhydfendigaid, Ystrad Meurig, Ceredigion.</b>	<b>Sŵn yr Afon, Abercegir, Machynlleth, Powys.</b>
<b>Postcode:</b>	<b>SY25 6ES</b>	<b>SY20 8NR</b>

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

## SECTION 3: Commenting on the Further Focussed Changes:

### 3a. Which document are you commenting on:

Please tick one:

- Schedule of Further Focussed Changes: An Addendum to the Powys Local Development Plan Deposit Draft 2011-2026 (October 2016)**
- Sustainability Appraisal Report (October 2016)
- Environmental Report (Strategic Environmental Assessment) (October 2016)
- Habitat Regulations Assessment Screening of Further Focussed Changes (October 2016)

### 3b. Which Further Focussed Change are you commenting on?

When making a comment or representation, it is important you tell us which Further Focussed Change you are commenting on.

Please remember to use **one form per representation**.

Further Focussed Change Number

**Renewable Energy Policy, RE1, FFC79**

Paragraph Number (Particularly if commenting on the Sustainability Appraisal, Strategic Environmental Assessment or Habitat Regulations Assessment)

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### Section 3c: Your Comments and Suggested Changes

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

Explain why you object to or support the identified Further Focussed Change. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issue you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that she may raise.

Is your comment an objection  support  comment ? (Please tick)

Please use the space below to set out your representation:

The Cambrian Mountains Society (CMS) welcomes this opportunity to comment/object on the *Further Focussed Changes* to the Authority's Local Development Plan.

CMS was established in 2005 and now has a membership of around 370, representing people from all backgrounds but all with a common interest in the future of the Cambrian Mountains. The majority of the membership live either in Powys or Ceredigion. The objects of the Society include; promoting for the benefit of local communities and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest and cultural heritage of the Cambrian Mountains. More details of the Society can be found on the website: [www.cambrian-mountains.co.uk](http://www.cambrian-mountains.co.uk)

CMS's major drive over the last eleven years has been to have the "Cambrians" protected as an Area of Outstanding Natural Beauty (AONB) and it sees these *Further Focused Changes* as a constraint to this ambition. As Powys covers about 50% of the area\* the Society would like to see designated it feels that it must object to the Renewable Energy Policy RE1, FFC79. In fact the Society has a number of objections, based around its vision for the "Cambrians", to the proposed changes in the LDP.

\*CMS uses the Countryside Commission's proposed boundary from 1973 for a Cambrian Mountains NP.

**a) Failure of the focused changes, notably the Local Search Areas (LSAs), to take account of impacts on the outstanding landscapes of rural Powys.**

"Landmap" Why has NRW's Landmap <https://naturalresources.wales/planning-and-development/landmap/?lang=en>, with its multiple layered evaluations of Landscape, not been consulted in the identification of LSAs? For Instance: in the proposed LSA west of Newbridge on Wye:

Aspect area 'Bryn Glas and Bryn Moel uplands' (ref. BRCKNVS999) has a 'High' rating in the Visual and Sensory layer of this GIS system. It moves on to say that the defining qualities that should be conserved in this area are its: *"openness, tranquillity, wildness, remoteness"*.

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And yet the FFC has this area demarcated as a Wind LSA and it is also very close to a Solar LSA.

The Society also believes that not only would the construction of large scale wind farms in this LSA be damaging to the area itself but the imposition of an array of large turbines (120m+, tip height seems to be the norm now) would have a huge effect on the landscape for miles around.

- b) Failure to take into account Wild land:** Here the Society points to the 2014 paper from The Wild Land Research Institute, Leeds University ‘Wildness Study in Wales’ [http://www.wildlandresearch.org/media/uploads/Report\\_WildMappingWales-v.2-Feb-2015.pdf](http://www.wildlandresearch.org/media/uploads/Report_WildMappingWales-v.2-Feb-2015.pdf)) It will be seen that the proposed wind LSAs fall within those areas identified as free of modern human artefacts (fig 2.7), and as ‘wild land’(fig3.1), as do the major part of the proposed solar LSAs. Surely Powys CC. should not sacrifice these wild lands, now acknowledged as being important to both residents’ and visitors’ health and well-being, in return for questionable amounts of electricity.

The Society understands that each MW of solar generation needs 6 acres of land (AECOM/ Powys CC, “Powys Renewable and Low Carbon Assessment”, 2016, page 30). Taking that the Authority has set itself a target of 308.2MW of electrical energy to be generated by solar panels, this will need 1850 acres of land take, equivalent to over 900 football pitches.

- c) Failure to take into account Historic Landscape and Archaeology:** Powys is a county rich in archaeology, much of it unexplored, as well as historic sites and buildings. Our uplands are not blanks to be filled in with modern energy generation but rich and diverse historic and cultural landscapes. This quote from the National Trust objection to Further Focussed Change FFC79 says it all:

*“The area of Abergwesyn is a wild and ancient landscape, with far reaching views. People have lived and worked in this upland landscape for over 9000 years, the majority of the area has never been ploughed or disturbed. Abergwesyn Commons has a wealth of remains including 14 bronze age cairns, 95 medieval sites and 459 sites classified as post medieval. It is a place of unspoilt and dramatic landscapes; a combination of wilderness; tranquillity; wildlife and views. A visit to this proposed LSA is truly an escape and forms the rooftop of Wales.”*

- d) Failure to take into account impacts on wildlife including plants and soils:** As an example, the proposed Solar LSA situated around the settlement of Dylife sweeps over Montgomeryshire Wildlife Trust’s Glaslyn Nature Reserve. This Reserve, which is also covered by the Pumlumon SSSI, holds a rich assemblage of animals and plants including; Red Grouse and Hen- Harrier as well as newly restored, carbon sequestering, blanket bog. It is at the very heart of the Wildlife Trust’s Pumlumon Project -“a pioneering, science-based project to revive the ecology and economy of the Welsh uplands” <http://www.montwt.co.uk/what-we->

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[do/living-landscapes/pumlumon-project](https://www.gov.wales/do/living-landscapes/pumlumon-project) Areas such as this in Powys, rich in 'Life', should not be condemned into becoming new industrial landscapes.

- e) **Failure to take into account the associated grid transmission infrastructure:** No account has been taken of the prospect of more high voltage power lines cutting across our most iconic uplands. Can you imagine a power line striding through Hyddgen, site of Owain Glyndŵr's 1401 battlefield? But again this remote, wild valley is part of a proposed Solar LSA!
- f) **Ignoring the Health and Well-being of local Residents:** The Well-being of Future Generations (Wales) Act, 2016 has as one of its seven well being goals; - "*A healthier Wales – A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood*". CMS is concerned that the residents of communities such as Llangurig, which is in the middle of a proposed solar LSA, will see a detrimental effect to their health as they sit amidst acres of highly reflective solar panels. A similar case can also be put forward for people living in the wind LSA west of Newbridge on Wye, will their well-being be enhanced under the shadow of massive wind turbines?

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Moving on, **this Policy does not address local need:** The newly introduced renewable electricity target of 600MW (50MW in earlier iterations of the LDP) is not remotely proportionate to any local need. The AECOM/ Powys CC. 2016 report, previously cited, page 37 states;

*"The total electrical energy that is currently being generated across Powys (or will be when all currently consented projects and those under construction are built) from renewable and low carbon energy technologies is circa 810 GWh, which equates to circa 133% of the total electrical consumption across Powys in 2008 and 134% of the total predicted electrical consumption across Powys in 2026."*

And yet this FFC condemns large areas of Powys' uplands, much of which are in the Cambrian Mountains, to potentially huge amounts of industrialisation! As such the Society asks the question;

**Weren't the Strategic Search Areas (SSAs) put in place by Welsh Government in TAN 8 supposed to protect our countryside from the sprawl of renewable energy technologies across it?**

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Outline what changes are needed to the Further Focussed Change to make the LDP sound:

- a) **That all LSAs proposed by FFC79 for land within the Cambrian Mountains (using the 1973 proposed Cambrian Mountains National Park boundary) be removed from the LDP.**
- b) **CMS is of the opinion that adjustments to the LDP in relation to FFC79, Renewable Energy Policy RE1 there is Democratic Deficit and this should be addressed:** As with earlier iterations of the LDP, with such major changes to the plan a full public consultation exercise should be conducted including public meetings/displays hosted by county councillors and officers of the Authority.
- c) The Authority should ensure that all legal procedures have been followed in writing the FCCs, in particular FFC79. **This should include conducting a full Strategic Environmental Assessment (SEA)** to ensure that environmental impacts are acceptable and proportionate to benefits.
- d) **The Authority should also ensure that it has ownership of its own LDP** again with particular reference to FFC79 and not be unduly influenced by other administrations.

From Planning Policy Wales 8 (PPW),

<http://gov.wales/docs/desh/publications/160104ppw-chapter-2-en.pdf> paragraph 2.2.1

*“It is for the local planning authority to determine how its LDP should be tailored to the needs of the area based upon robust evidence.”*

I am enclosing further supporting information and material.

#### **Section 4: After making your representation**

Receipt of your representation will be acknowledged by the LDP team at Powys and it will then be forwarded directly to the Planning Inspector.

Everyone that wants to change the Plan can request to appear before and speak to the Inspector at a ‘hearing session’ during the public Examination. However, you should bear in mind that your “written representations” on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

- 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):**

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- 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 explain what you wish to speak to the Inspector about.**

See Section 3c of this Representation form from which the Society might like to expand on its points a) through to f).

If you wish to speak please tick which language you would like to be heard in:

English ✓

Welsh

### THANK YOU FOR YOUR COMMENTS

Forms should be returned to: LDP Team, Planning Policy, Powys County Council, The Gwalia, Llandrindod Wells, Powys. LD1 6AA or emailed to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk) .

The closing date for representations is **5.00pm Monday 21st November 2016**. Representations received after this date will not be accepted.

Representations **on the proposed Further Focussed Changes** submitted during this consultation period (**Monday 10<sup>th</sup> October – Monday 21<sup>st</sup> November 2016**) will be forwarded to the appointed Inspector.