

## Consultation Response Form

Name: Professor Roger Earis

UCO and GPDO Consultation:  
Consolidation of the Town and Country Planning (Use Classes) Order 1987 and Town and Country Planning General Permitted Development) Order 1995

Organisation: The Cambrian Mountains Society.

email: [chair@cambrian-mountains.co.uk](mailto:chair@cambrian-mountains.co.uk)

Telephone Number:

Address:

Reference – WG33507

September 2018

### A FEW DETAILS OF THE CAMBRIAN MOUNTAINS SOCIETY (CMS)

More information on CMS can be found on its website: [www.cambrian-mountains.co.uk](http://www.cambrian-mountains.co.uk)

CMS was formed in 2005 with the following objects

- a) To promote for the benefit of local communities, and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, cultural heritage and geodiversity of the Cambrian Mountains.
- b) To advance the education of the public in the landscape, natural beauty, biodiversity, archaeology, scientific nature, cultural heritage and geodiversity of the Cambrian Mountains.

The Society is a registered charity (number – 1113037) and currently has a membership of around 300.

Since its inception the Society has consulted, and campaigned over many issues including;

- land management techniques in the Cambrian Mountains,
- the spread of wind farms in the area, and
- the implementation of Local Development Plans (LDPs) in the Counties which cover these hills.

### CMS will only be responding to Question 55 of this consultation.

#### Q55 Do you agree with the principle of establishing permitted development rights for small scale, low risk hydropower developments in Wales?

**NO** All small scale ('low risk' -*WG's phraseology*) are a potential threat to;

- the riparian ecosystem of the abstracted stream,
- the ecology of surrounding habitats,
- the historic/archaeological sites close to the development, and to
- the overall landscape in the vicinity of any such scheme.

Whilst CMS believe that throughout Wales any such small-scale hydropower schemes should remain subject to the full planning permission process, that this is especially important in such areas as the Cambrian Mountains - areas of outstanding beauty.

Specifically for the Cambrian Mountains moving to a scheme of “Permitted Development Rights” flies in the face of the evidence, legislation and guidance listed below:

1. **Landscape Quality** Large swathes of the Cambrian Mountains are classified as either of “Outstanding” or “High” quality in NRW’s Geographical Information System – *LANDMAP*.
2. **Special Landscape Areas (SLAs)** Both Ceredigion and Carmarthenshire Local Authorities have decided that large parts of the Cambrian Mountains are of such high quality that they be designated as SLAs in their Local Development Plans (LDPs);
  - Mynydd Mallaen SLA (Carmarthenshire)
  - Northern Uplands SLA (Ceredigion)
  - Southern Uplands SLA (Ceredigion)

And of course these designations are supported by Special Planning Guidance (SPGs) from each of the Local Authorities.

3. **Scientific Designations** Considerable areas within the ‘Cambrians’ are designated as
  - SSSIs (UK legislation) for example Pumlumon and some as
  - SACs (European Union legislation) examples include, The Elan Valley Woodlands and The Elenydd
4. **Historic Landscapes** CADW considers several areas in the ‘Cambrians’ as of such importance that they have registered them as ‘Historic Landscapes’, two examples being;
  - Upland Ceredigion and
  - The Clywedog Valley.

The Society strongly believes that for Welsh Government to suggest that landscapes of such quality, with outstanding habitats, and with historic/archaeological importance, be taken out of the full planning permission process flies in the face of all previous work to protect our countryside from inappropriate developments. CMS recommends that WG adhere to the ‘Precautionary Principle’ and that it, and Local Authorities, continue to use the full planning permission process when considering small scale (*low risk*) hydro schemes.

CMS considers that it is not appropriate for it to respond to questions 56 through to 63 in the light of its response to Q55. The Society views moving to a system of ‘Permitted Development Rights’ for small scale hydropower developments in Wales as potentially extremely damaging to one of the Nation’s greatest assets – its countryside!