

Comments on the Draft:

It is not the intention of CMS here to go through a long critique of the draft, or its appendix, but rather to offer a few “broad brushstroke” comments on the document’s intent. These comments are largely based on the Society’s experience of the recent IPC examination of Powys C.C.’s LDP (see back to the introduction to CMS on page 1).

In producing the LDP Powys C.C. contracted out the scoping work for renewable energy provision in the County to a consultancy whose experts develop innovative solutions to the world’s most complex challenges. But the consultancies report, and the LPA’s acceptance of it, came under much criticism for the way in which they had allocated a large number of Local Search Areas (LSAs) “suitable” for either wind and/or solar photovoltaic renewable energy schemes. The survey work behind the consultancy’s report was largely based on resource (sun and wind) provision and took no account of landscape sensitivity. It was the opinion of CMS that several of the proposed LSAs would have had multiple deleterious effects on what is a National Landscape Character Area- the Cambrian Mountains. The imposition of these LSAs would cause long term damage to that character including to its; Visual & Sensory aspect, Ecology, Archaeological setting and Cultural heritage. Alongside CMS other organisations, as well many individuals, expressed concern over the proposed LSAs. In response the LPA brought in a second consultancy, more versed in landscape sensitivity assessment in relation to renewable energy developments. This consultancy recommended a big reduction in the number of LSAs (including totally removing the allocation of Wind LSAs).

The above scenario also begs the question – how useful was/is WG’s Renewable Energy Toolkit, which both the consultancies and the Planning Authority used, in preparing the LDP? A toolkit that ignores impacts on landscape character merely suggesting that LPAs should think about doing this as a further refinement.

Thinking along the same lines, looking at section 7.2 of the draft, the Society sees that NRW’s initial advice on best practice is,

“for two assessors to make judgements – so they can challenge each other to result in a more robust assessment.”

But in the same paragraph this best practice is scaled back,

“Pragmatically, cost may limit this and if so, it may be better to have one good experienced assessor making a clear judgement than have two who are less so.”

Leading on from the Powys LDP examination described above CMS strongly recommends that NRW’s pragmatic course of action, when completing a Landscape Sensitivity and Capacity Assessment (LSCA) is **not** followed. Powys C.C. must have considered that in giving the contract to the initial consultancy that it had taken on a good experienced team of assessors well versed in making a clear judgement. It is the Society’s view that this was a mistake and that a minimum of two experienced Landscape Architecture assessors should be contracted by an LPA as it takes on an LSCA as part of an LDP.

CMS does, however, agree with the draft document’s stance on tendering (Section 7.6) for LSCA contracts, that evaluation of tenders should not favour the cheapest tender which may be very far from the best. Moreover following the Nolan Principles of Public Life a cosy relationship between any LPA and a Landscape Architecture Practice cannot be condoned.

A brief comment on the Document's Annex.1 - Methodology Guidance for Assessors

As evidenced by the dichotomy of opinion of the consultancies used by Powys C.C. in putting together their recent LDP assessing landscape sensitivity and capacity is not an exact science, it is judgement process. Whilst the susceptibility criterion tables in the Annex (here we refer largely to Fig.26 (wind), pages 38-41) may help to inform these judgements CMS again asserts that a minimum of two independent expert opinions is the right course of action when considering the medium to long term future of any landscape.

Alongside this CMS is concerned over the rather fixed locations of the descriptors in Fig.26's landscape susceptibility criteria. For instance, in relation to a hypothetical character area within the Cambrian Mountains (in fact quite a common landscape type in the Cambrians) one assessor may judge it important that, from one row of the figure, this is a **rolling plateau like landscape - and as such less susceptible to wind turbines**. Whilst a second assessor may, using another row of the figure judge that importance lies in that it is an **open unenclosed landscape where turbines and the ground from where they rise are widely visible - and as such more susceptible to wind turbines**.

But ultimately it is for the Planning Authority to assess, on the evidence presented, if areas within their care are highly sensitive to renewable energy developments and do not have the capacity to accommodate change. This assessment should, however, probably involve the LPA in a local public consultation exercise.

CMS will continue to campaign on the basis of the above, that the Cambrian Mountains as a whole are highly sensitive and do not have the capacity to accommodate change as regards to medium/large scale renewable energy projects. On from this the Society does not confine its attention to Local Authorities and their LDPs but it continues to be very aware that within the Cambrian Mountains there is a Strategic Search Area set up by WG under Tan 8. The Society considers that if Nant y Moch (SSA D) were put under the scrutiny of this proposed LSCA that it would not fit the criteria for large scale renewable energy development. Perhaps NRW should review this despite statement 1.7 from the draft document that ***“There is no implication that past assessments that vary from the LSCA approach set out in this guidance are invalid, and many of these remain as useful evidence and understanding to inform spatial planning.”*** Whilst the CMS objects only cover an area which includes SSA D it believes that a similar review for all the other SSAs put in place by WG's Tan 8 should be done.

CMS hopes that you find these comments useful as you amend the draft but if further clarification is needed then the Society can be contacted either using the email address in the letterhead or the address below.



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