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**[See endnote for brief details of the Cambrian Mountains Society (CMS)]**

16<sup>th</sup> May 2019

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**To:** Lesley Griffiths, Minister for Environment, Energy and Rural Affairs.

at: [Correspondence.Lesley.Griffiths@gov.wales](mailto:Correspondence.Lesley.Griffiths@gov.wales)

**cc.** Mr. Peter Alexander-Fitzgerald, Chair of CPRW National Executive Committee,  
Prof. Terry Marsden, Chair of Alliance for Welsh Designated Landscapes.

**PPW edition 10 abandons key principles of impact assessment  
of renewable energy in relation to designated areas,  
and in particular those in the Cambrian Mountains.**

Minister

Firstly, can I emphasise that CMS is not anti-renewable energy but the Society does believe that Wales' Protected Landscapes, as well as important conservation sites, should not be further compromised by industrialisation without a rigorous assessment of their impact in line with accepted guidance such as that published in established guidelines for landscape and visual impact assessment (GLVIA3). These sites already provide a range of ecosystem services including making a huge contribution to the Nation's health and well-being.

Planning Policy Wales, edition 10 Paragraph 5.9.17, relates to the assessment of impacts of proposals to develop renewable and low carbon energy and gives the Society cause for concern, particularly the underlined text, below.

*Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security. In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets.*

CMS is concerned by both aspects of the phrase “only the direct irreversible impacts.....should be considered.”

CMS understands the term ‘direct impacts’ to mean those that occur to the application site itself. While these may be a concern, wind turbine developments have wider impacts on the surrounding landscape, normally regarded as ‘indirect effects’. These key impacts are now excluded from consideration.

As part of their planning consent wind turbine farms (for example) have a defined consent period, typically 25 years. When this comes to an end the planning permission requires that the turbines be decommissioned and removed. Planning policy thus regards the turbines as being reversible. In terms of the text above, their impacts are therefore exempted from consideration in the planning process. There is also the issue of repowering when a wind farm company applies to replace the aging turbines within an existing development with new larger machines. Effectively, once consent is then given, the wind farm is irreversible.

Whilst the Cambrian Mountains may not yet be a National Park or an Area of Outstanding Natural Beauty much of the area is covered by a combination of SSSI, SAC, SPA and “Historic Landscape” designations. Paragraph 5.9.17 of the updated planning policy requires the three local authorities (Ceredigion, Powys and Carmarthenshire) covering the Cambrian Mountains the power to give significant weight in the planning process to WG’s renewable energy generation targets in such designated areas, be they statutory or advisory. The following three examples which may have to be considered by the Planning Authorities in the future illustrate the consequences of paragraph 5.9.17 on landscape, biodiversity and visitor facilities in the Cambrian Mountains.

- Within the Cambrian Mountains are the Pumlumon, Elenydd and Mynydd Mallaen SSSIs, all three with large areas of carbon sequestering blanket bog. The Planning Authorities with responsibility for these statutorily protected sites, giving significant weight to Welsh Government’s renewable energy targets, might well be required to allow large numbers of wind turbines within wind farms to be built because they are ‘reversible.’ Yet it would seem that the access tracks as well as the cable-laying to these turbines would be regarded as ‘direct irreversible’ impacts and so have to be considered in the planning process. This is clearly an inconsistency.
- Similarly, which of the intake dam, penstock, powerhouse and access track of a micro-hydro scheme along the Afon Pysgotwr within the Cwm Dothie/Mynydd Mallaen SAC will be regarded as reversible or directly irreversible in the planning process?
- Large numbers of tourists make return visits to the iconic cultural site in the Registered Historic Landscape around the site of the Cistercian Monastery at Strata Florida. PPW10 would require the planning system to regard large arrays of solar panels around the Monastery as reversible and thus beyond its remit.

However, PPW10’s restriction of impact assessment on national designations raises a wider question. If existing procedures are to be watered down in the top tier of landscape and habitats it must follow that at least as great a relaxation of process would apply to the wider undesignated countryside – and thus the Cambrian Mountains as a whole. CMS regards this as an assault on the current process of assessing impacts. It considers that paragraph 5.9.17 of PPW10 should be withdrawn so as to allow the current system of assessment to continue. As such the Society asks that you instruct the Planning Directorate to review the Policy.

I look forward to your response.

Yours

A handwritten signature in black ink, appearing to read 'P. Foulkes', with a long horizontal flourish extending to the right.

Mr. Peter Foulkes Acting Chairman The Cambrian Mountains Society.

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### **Brief details of the Cambrian Mountains Society (CMS)**

**CMS** was formed in 2005 with the following objects:

- a) *To promote, for the benefit of local communities, and of the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, and cultural heritage 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.*

CMS is a registered charity and at present has a membership of around 300. At the heart of the Society's work is that the glorious landscape of Cambrian Mountains might be better protected probably by joining the Welsh family of Protected Landscapes. This could be either as Wales' fourth National Park (NP) or fifth (sixth, including the Wye Valley joint Welsh/English designation) Area of Outstanding Natural Beauty (AONB).