

POWYS LDP: HEARING SESSION 15. RENEWABLE ENERGY

Submission from B.A.KIBBLE C.Eng (representor no. 5963)

My submission relates to questions 4b and 5 of the Inspector's Matters and Issues Agenda.

Synopsis

I welcome the work carried out by Powys County Council and their consultants to correct and improve the Renewable Energy policy and its backing information in order to make it more suitable for the environment of Powys.

However, it appears that further simple refinement work on the Solar Local Search Areas is required to properly take account of the very important environmental and amenity aspects of the county, ensure a proper balance is struck, and ensure the process does not place the planning system in bad repute.

Submission

Reading the AECOM and Enplan reports and the Powys statements regarding solar farm deployment, in general the methodology employed is understandable but, of course, in certain aspects not fully recognisable as the papers are only the necessary 'summary' reports. I can understand how some solar areas have disappeared due to the increase in constraints but am at present at a loss as to how areas have appeared in the second version that were absent from the first.

Although, on the face of it, the list of constraints looks comprehensive it is of concern that Access and Common land is not included. The hard won amenity of the CROW act should surely not be removed at a stroke especially when, as is pointed out by Enplan, solar farms with their fencing and security arrangements are not really compatible with such access. The issues of high carbon soils, and effects upon National and Regional walking and cycling trails also do not appear to have consistent application.

The process followed by AECOM to produce the analysis for the S4 maps is understandable. However the subsequent grouping together of areas to produce 'LSAs' for landscape assessment and ultimately publication does appear to lead to some significant problems that could be easily avoided. Examples of these are:

- The areas contain very large areas of constrained land, possibly over 50% in many instances. AECOM say that the total land area goes up from 75.85 to 182.93 sq.km. thus well over half is constrained. It seems illogical to let a process that is designed to 'facilitate' landscape assessment dictate the search areas that are published and lead developers and the general public astray.
- The areas are not readjusted, after landscape assessment, to take account of the sections that Enplan say are too sensitive for development.

- On reading the Enplan assessment it is obvious that they find sections of the areas, as regards landscape assessment, as suitable but these were already constrained sections. Surely a worthless and confusing position which will lead to major planning wrangles.

The publication of such 'unrefined' areas which are patently more full of sections that are not suitable than are suitable is a recipe for developer, county council and public angst and falsely raised aspirations and objection. It does the planning system discredit and wastes years and potentially millions of pounds for all parties. This can clearly be seen exemplified by the very similar process employed in designating Strategic Search Areas for wind in Mid Wales.

It would appear that the areas could now be very quickly and easily refined by taking out the land sections affected by the above issues using the data already on the consultants' systems. Further, with a prioritisation and cumulative analysis system, similar to that devised by AECOM for map S9, suitable areas could then be defined that would not lead any parties astray, would satisfy the target of 45 MW set by Powys and would minimise environmental and amenity damage. This would lead to the correct balance that the Inspector's question 5 requires.

It is also noted that there is no mention in the Powys REA position paper about a time limit for solar farm installation. Enplan draw attention to a normal limit of 25 years and this needs to be reflected in the LDP Policy.

Examples of the above issues are attached. Most of the LSAs appear to have such issues and it is important to stress these are only examples.

B.A.KIBBLE

Examples

LSA S7 Heldre Hill

Map S5 of the AECOM report shows that the vast majority of the red dots are on the north west side of the road and therefore in the Open Access land (the only such land on Long Mountain). The land on the south east of the road is predominantly constrained but Enplan recommend mostly sections in this area. What is not mentioned is that the minor road which will pass through the farm is an important upland section of the cross Wales Sustrans National Cycle Route 81 Lon Cambria which is described in their publicity as ' This route takes you on a fantastic, challenging journey through the spectacular scenery of Mid Wales.' The road is also the route of a Roman road.

For many reasons therefore this LSA does not appear suitable.

LSA S6 Buttington

The effect of this LSA on the very proximate Offa's Dyke National Trail and the Severn Way long distance Trail and the Montgomery canal are not at all analysed. These are very important amenity and tourist assets for Powys as the LDP says and should not be compromised.

LSA S8 Staylittie

This LSA is nearly all either windfarm (built or to be built), forest or Open Access Land. Thus most of it is constrained or not suitable.

LSA S17 Waun Ddubarthog

This extremely large area, as can be seen from map S5, only has non- constrained land in a few areas. The Enplan analysis appears to require the removal of the northern red section. Some areas proposed by Enplan such as the Marteg valley are constrained.

The suitable area would therefore be much reduced by correct refinement leading to much greater confidence in a legitimate LDP process.