

## Matters & Issues Agenda

### Agenda item

#### 3c “Has the Plan been informed by a robust consideration of reasonable alternatives?”

No, it is quite apparent that the Plan has not been informed by a robust consideration of reasonable alternatives.

The proposal is to construct large industrial structures in completely unspoilt remote hillside country – one of the last few such areas in England and Wales.

These sites should not be considered until the plethora of industrial and warehouse roofs in our towns and cities have been covered with electrical generation devices.

#### 4.b) “Has the policy been informed by robust and credible evidence?”

No, it is apparent that the policy has not been informed by robust and credible evidence,

The proposal is to construct these appliances in an area with lower-than-average sunshine and higher-than-average cloud cover (and hence generating capability) when compared with the lowlands of England and Wales. This underlines the logic for locating such industrial installation on the roofs of factories and warehouses.

Photo-voltaics should be constructed adjacent to the point of use, thereby eliminating the distribution losses through many miles of power cables. Such losses can absorb an appreciable proportion of the energy being produced. This is of especial relevance when considering that this is an area with lower than average sunshine.

#### 5. “Does the Plan provide an appropriate balance between realising the area’s potential for renewable energy production and the protection of the landscape, natural and historic environment of Powys?”

No, the proposal does not protect the exceptional scenic landscape of rural upland Powys.

## Position Statement, May 2017

4.1.2.B). “The baseline assumptions for Solar PV technology include:

- Buffers of 3.5km around existing, consented and proposed solar PV development;
- CAA restricted airspace (glare)”.

These assumptions recognise the need to protect restricted airspace from glare, but only consider a 3.5km terrestrial buffer from a proposed solar PV development. In this hilly terrain, it is quite possible to see refracted light from a PV development at a vast distance. This would detract from the current unspoilt countryside that visitors come to see.

How can the Council even consider despoiling Powys’ spectacular scenery?

4.3.3.2. “Enplan carried out a detailed landscape analysis which assessed the landscape value derived from LandMap.”

Wales is blessed with diverse landscapes which are a hugely valuable asset to the UK. Just because Landmap does not classify a landscape as being valuable, doesn’t mean that it is not an important asset that must be protected.

5.0.2. “Any new policy must take into account small schemes for which the Plan would continue to remain generally supportive.”

The mid Wales landscape has suffered from inappropriately sited wind developments. Enough is enough. Future renewable energy development should concentrate on factory, warehouse and agricultural roofs plus wind developments adjacent to towns and cities.

The same comment applies to paras 5.03 and 5.04.

## Draft policy RE1

### 39.91

Paras 1.2, 1.3, 2 (i) and 2 (ii). The words “appropriate locations” are far too vague to guide the planning officer in his/her determination of a planning application. This area predominantly comprises sensitive landscapes. To protect these landscapes, carefully defined rules are required. Future renewable energy development should concentrate on the use of factory, warehouse and agricultural roofs plus wind developments adjacent to towns and cities.

Para 3 (iii). The rules governing Residential Amenity need to be strengthened to adequately consider the impact on residents’ homes. Noise and shadow flicker have the ability to make life a misery. Once the development has been constructed, it is extremely difficult to introduce effective mitigation, so this must be carefully considered before planning consent.

7.02. “All applications will be considered on their own merits ... in accordance with planning policies and other material considerations.”

It cannot be over-emphasised that safeguarding residential amenity and landscape are the prime material considerations when the Planning Officer is determining an application. More guidance is required to assist the Officer.

Appendix 2, Table 2.1  
SEA Topic Area – Landscape.

“17. To protect and enhance Powys’ rich natural landscape.”

I do not see how either a solar or wind development can possibly “protect” Powys’ rich natural heritage. As to “enhancement” – this is impossible for any and every development.

In support of my opinion, Annex A – SEA of Policy RE1 objective 17:

- commences: “Negative effects on landscape and visual amenity may occur in the ... longer term once development is complete (for example, due to the scale of development resulting in impacts on the prevailing landscape character and views).” and
- concludes: “it is not possible to ascertain if Policy RE1 would have effects on Powys’ rich natural landscape because the exact type, scale and location of new development is unknown.”

Table 2.3 - Questions Used in the Assessment of Policy RE1

These questions are too generic and are not appropriate for the assessment of wind and solar developments. The responses in Section 3 have attempted to answer these questions – however, of necessity, such responses must be vague until a planning application is submitted.

11. Regeneration – “How is this helping to promote Powys and make it a location of choice (including to contribute to tourism)?“

I fail to see how wind and solar developments can make Powys “a location of choice.”

19. Health.

“How can it help to deliver mental well-being?

How can it reduce the number of people out of work due to ill health?”

Wind power has the potential to cause mental illness through noise (especially noise of turbines in combination) and shadow flicker. Such mental illness may increase the number of people off work due to ill health.