

Jenny Keal
Maes Mawr,
Aberedw
Builth Wells
Powys LD2 3UW
01982 560237

Powys County Council
Local Development Plan Examination

2nd June 2017

Submission in response to

Revised Renewable Energy Assessment for Powys (ED059)

Further to my original representation numbered 6513 to the consultation last November, I add a further submission below:-

Hearing Session 15 – Renewable Energy

Is the Revised Renewable Energy Assessment sound?

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind plan policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?
- Will the plan deliver (i.e. is it likely to be effective?)

I list below the reasons why the Further Focused Changes 79 fail the soundness test on several of the above points

Agenda item 3

- a) The Local Development plan has been inadequate in involving the community, many residents were only aware of the FFC's after being advised of their existence by CPRW. 2. The participant list for Hearing 15 was reduced on 26th May from 75 to 22. Many of those removed were unaware that they were required to confirm their

attendance by an unspecified date and have been removed without their knowledge. I had confirmed my participation but was still removed from the list and only after insisting was I reinstated. This was done over a bank holiday weekend when people had no opportunity to get a response from the officer from Thursday 25 May 2017 at 22:44 until 30 May 2017 at 09:45 and consequently had an anxious four day wait to get an answer. This is not a fair and democratic way to run an examination.

- b) The Sustainability Appraisal does not address Section 7 (Species and Habitats) of the Wales Environment Act 2016 which requires local authorities to “*seek to maintain and enhance biodiversity*’. 1. Any development must not damage key habitats and several of the upland areas identified as suitable for development of Solar Arrays are habitats for vulnerable species such as Curlew and Lapwing. 2. Upland areas of Powys are commonly peat reserves. Peat is a carbon sink and during construction of Solar Arrays on many of the upland areas identified, disturbing the peat would release CO2 into the atmosphere which would be self defeating if they are meant to reduce CO2 emissions
- c) Use of open moorland, Open Access land, Commons with grazing rights, and productive agricultural land for Solar energy is unnecessary when the use of roof space on industrial units, council owned buildings, agricultural buildings and domestic roofs are available and are more suitable and sustainable. Why needlessly target the uplands, which are disproportionately vulnerable to visual and ecological damage, and where the grid connection would be an obstacle.
- d) One of the provisions in the Wellbeing of Future Generations requires there to be jobs available for young people. Powys County Council’s Sustainable Tourism report of 2013 states that “*Tourism makes a substantial contribution to the Powys economy, supporting over 12,327 jobs. There are 1,549 tourism accommodation establishments in Powys, STEAM research figures indicate that 3 million day trips were taken in 2011, spending £ 84.4 million in the local economy.* (These figures are 5 years out of date but there is no equivalent, more up to date, report on the Powys website, therefore we can assume an increase in these figures) It is clear that tourism has a crucial part to play in the local economy and the wellbeing of our future generations depends upon our landscape remaining attractive to visitors. I spoke to a couple from Cornwall only last week who visit Powys regularly and they confirmed that the attraction of the county is the undeveloped nature of our landscape. We are told this time and again by visitors and the protection of the landscape is key to our sustainable future. A large proportion of visitors to our county as well as local residents use the landscape for exercise and relaxation. Ramblers, dog walkers, horse riders and mountain bikers will all be affected by large arrays of solar panels which are surrounded by 6 foot high deer fencing for security purposes and thus restricting the use of Open Access land and potentially bridle paths and rights of way.

Agenda Item 4

- a) The policy is inconsistent with the Wales Environment Act 2016 as outlined in Agenda item 3b). Neither does it address the “Disadvantages of Solar Farms” National Assembly for Wales own document dated March 2015
- b) The Western Powys distribution network constraint map and the Manweb Heat Map for June 2017 both identify the Category Red status of the Extra High Voltage transmission lines in Radnorshire. Code Red means *“At least one factor is close to its operational limit and so installation of most levels of Distributed Generation and local connection is highly unlikely. It may also require extensive reinforcement works or given the lack of local connection, require an extensive amount of sole user assets to facilitate such a connection”* meaning that any remotely sited solar array would require its own sole user connection into a power network that is already at capacity. This indicates it is not financially viable to site solar arrays in remote locations in Radnorshire. If this is the case why are they included in the renewable energy maps?
- c) In view of the inadequacy of the assessment of the suitability of the sites for the development of solar arrays based on the above information in Agenda item 4b and the potential for habitat loss, ecological and biodiversity damage, releasing of CO₂ from peat deposits on many of the upland sites and loss of amenity, I would suggest that the framework for assessing developments is unclear and inconsistent. 1. The Solar Local Search Area data produced by Enplan lists a number of upland plateau areas as suitable for large and medium scale solar developments with designations such as low landscape value, but gives no data on historic environment, wildlife habitat surveys, peat deposits or botanical data. If these areas are LSA’s there will be presumption in favour of planning applications for solar arrays without further surveys with potential loss of important landscape assets.

Agenda item 5

1. Given the that the 280 acres identified in the Revised RE assessment will produce 0.013% of the average daily electricity demand of the UK, the loss of habitat of rare and endangered species, the ecological damage to agriculturally unimproved uplands, loss of agricultural food producing land, and damage to peat reserves cannot be justified.
2. Sustainability also includes recycling of old components. Do the planning permission conditions stipulate safe recycling of solar panels? As they contain toxic chemicals such as Hydrochloric acid, copper, trichlorosilane gas and silicon waste. Cadmium. Nitrogen trifluoride and sulfur hexafluoride. Copper indium selenide and copper indium gallium (di) selenide., this is of paramount importance.

Agenda Item 6

1. Policy DM15 is adequate as far as it goes in encouraging solar panels on the roof space of new build homes but there should also be provision in the building regulations for encouraging retro fitting of solar panels on existing buildings and new extensions to existing homes. There should also be a requirement in planning for all new industrial and agricultural buildings to have a sustainable micro-renewable

energy scheme as part of their design. This would solve the issue of grid connection for solar arrays in remote locations where grid connection is a serious obstacle and the associated problem of transmission losses over long distances. 2 Natural England produced a paper in 2011 advising how best to maximise the environmental benefits of solar energy which lists *“Reduced chance that solar parks can be accommodated in the landscape as follows 1. Presence of strong topographical variety or distinctive landform features. 2. Complex, rugged and irregular. 3. Absence of modern development, presence of small scale, historic or vernacular settlement, roads and tracks 4. Strong inter-visibility with sensitive landscapes, Forms and important part of a view from sensitive viewpoints. 5. Physically or perceptually remote, peaceful or tranquil.”* Many of the areas identified in the LSA’s fall in to one or more of the above categories.

To Summarise :

- 1. Damage to key habitats, biodiversity and wildlife**
- 2. Damage to Peat deposits in upland locations releasing more CO2**
- 3. Inappropriate use of undeveloped land as opposed to brownfield sites**
- 4. Failure to identify suitable alternative sites for Solar energy**
- 5. Loss of amenity on open access land, rights of way and bridleways**
- 6. Wellbeing of Future Generations - Loss of jobs in tourism due to loss of wild places**
- 7. Lack of capacity in the local National Grid network**
- 8. Disproportionate amount of energy produced to acreage required.**
- 9. Insufficient and inefficient consultation and examination process.**
- 10. Key guidance from conservation bodies have been ignored.**

I would like to add that the process of preparing the LDP has been unprofessional and undemocratic. The introduction of Further Focused Changes 79 into the Local Development Plan at a late stage and the inadequacies, inaccuracies, and anomalies of the original Aecom Renewable Energy Assessment, which was deeply flawed with no account taken of perfectly obvious landscape constraints has resulted in all of the Wind Energy LSA being removed from the FFC’s in the Revised Renewable Energy Assessment. The original report alarmed a great many residents and created an atmosphere of distrust in the council’s integrity and competency. Furthermore this revised assessment by the same consultants has resulted in unnecessary expenditure on the part of Powys County Council who have paid twice for flawed evidence.

Jenny Keal

Enc.

1. Wales Environment Act 2016 – Section 7
2. Sustainable Tourism Powys 2013
3. Manweb & Western Power Distribution Constraint Maps
4. Natural England Technical Information Note TIN101