



Campaign for the Protection of Rural Wales  
Brecon & Radnor and Montgomery Branches  
Correspondence by email to Chairs or to:  
Upper Noyadd, Clyro, HR3 5JS

LDP Reference 6235

9<sup>th</sup> October 2017

Dear Inspector Gulley,

CPRW Powys Branches are grateful for the opportunity to comment further on the MACs to the Powys LDP and we very much appreciate the inclusion of the Constraint Maps which, for the first time, include maps of LSA locations and boundaries of sufficient detail in the LDP document library. We think the public will be especially keen to comment on the individual LSAs since there was not enough time to do so at Hearing Sessions 15 A & B.

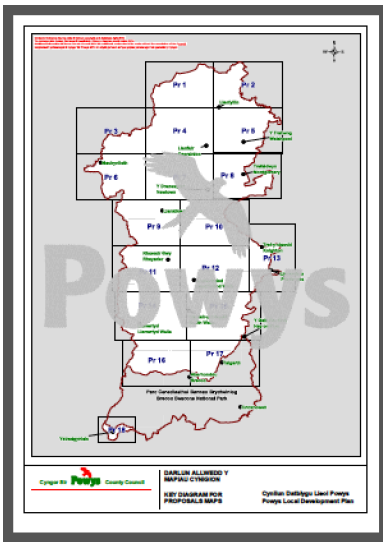
We have reviewed the MAC documents on the Powys web site and we think people may find it difficult to respond about the individual LSAs. We do understand that PCC has presented the Written Statement and Proposal/Inset Maps as two series of numbered MACs (MAC number and MAC M number) and also in composite form. In spite of this, we have had considerable trouble in sorting out the identity and boundaries of the LSAs and believe people who are less familiar with the LDP documents will have even more trouble.

### **Identifying LSAs on a map**

When the revised REA and Enplan Landscape Sensitivity study were published, the boundaries of the potential solar LSAs were shown:

- On three separate maps in the Aecom Revised REA ED059 Maps S6 1to 3 where the potential LSAs were numbered and it was difficult for people to view the overall picture.
- In the Enplan Landscape Sensitivity Study ED060 where a rather clearer map of each numbered LSA was shown on the appropriate page.

Currently, in the Mac documentation, those Proposal/Inset Maps which have been altered have been given MAC M numbers but, because some of the maps have not been altered, some MAC numbers are different from the Proposal Map numbers which may give rise to confusion. There is further confusion because some LSAs appear on two Proposal Maps. These Proposal Maps do not seem to fit together accurately, probably due to small differences in scale. In order to appreciate how the maps (almost) fit together the reader has to turn to the composite version ED083h 1. Page 2 (shown below) because this essential plan is not included with the MACS. The LSA(s) and the changes listed for each Proposal Map do not give LSA name(s), LSA number(s) or LSA alphabetical reference(s).



It is impossible to match an LSA names to a number reference by referring to the Written Statement because the names have been given new reference letters rather than the numbers used in all other documents (see ED038b:pp86&87) thus Abertridwr is now **SB** instead of **S3** but the equivalences are not explained. A reader who wants to find out if there are LSAs near their home or in a favourite part of Powys countryside would have to look at the Aecom Maps s6 series for an overview. The three S6 maps are buried towards the end of thirty nine maps. Alternatively, if they recognised the name of the LSA they might start from the MAC list (MAC 124). Either way, to see a good legible map of a named LSA, which they could locate on their own OS map, they would have to match up an LSA name and an 'old' number by looking through ED060 (Enplan Landscape Sensitivity Study) then they could look up this number in ED079 (Constraints Maps where no LSA names are given) to see a detailed map corresponding to the number. They would then know the 'old' LSA number and the LSA name and have seen a reasonably detailed LSA map and would be able to match these to the new letter-reference in MAC 124.

We have discovered this process and matched up names, numbers, letters, Proposal Maps and MAC references. Although CPRW is familiar with the existing website documents, it was an extremely time consuming and very confusing experience. We do not think that it is reasonable to expect people to go through this process.

### **Commenting on the LSAs in the consultation process**

If someone wants to comment on some aspect of a particular LSA, they will not know what MAC forms to fill in. There may be two Proposal Map MACs involved and a Written Statement MAC. For instance one of the larger capacity LSAs, Llandyfalle Hill, **SR**, is on Proposal Maps 16 and 17 in ED083c, which are the subject of **MACS M15** and **M16** respectively and it is also mentioned in ED083b under **MAC 124**.

There are already 138 MAC categories and 67 MAC M categories. Surely it is asking too much to require more than one form for comments on a single LSA.

We have produced a table to demonstrate these problems:

<b>PCC OLD REF</b>	<b>PCC NEW REF</b>	<b>SOLAR LOCAL SEARCH AREA NAME</b>	<b>WHICH MAC? WHICH Proposal Map?</b>	<b>ED060 Landscape Enplan Page</b>
S1	SA	<b>BACHRYDRADA</b> 2km east of Tregeiriog	<b>MAC M3</b> <b>Proposal Map 2</b>	ED060 P13
S3	SB	<b>ABERTRIDWR</b> 3km east of Lake Vyrnwy	<b>MAC M2</b> <b>Proposal MAP 1</b>	ED060 P15
S4	SC	<b>FFRIDD LLWYDIARTH</b> 2km north of Dolanog	<b>MAC M5</b> <b>Proposal Map 4</b>	ED060 P16
S5	SD	<b>DONGAY</b> 1km north-west of Llandrinio	<b>MAC M6</b> <b>Proposal Map 5</b>	ED060 P17
S6	SE	<b>BUTTINGTON</b> 2km north-east of Welshpool	<b>MAC M6</b> <b>Proposal Map 5</b>	ED060 P18
S7	SF	<b>HELDRE HILL</b> 6km due east of Welshpool	<b>MAC M6</b> <b>Proposal Map 5</b>	ED060 P19
S8	SG	<b>STAYLITTLE</b> 1km east of Staylittle	<b>MAC M7 &amp; M8</b> <b>Proposal Map 6 &amp; 7</b>	ED060 P20
S11	SH	<b>TREFEN</b> 1km east of Trefeglwys	<b>MAC M8</b> <b>Proposal Map 7</b>	ED060 P23
S13	SI	<b>GLYNHAFREN</b> 1.5km south of Lyn Clwyedog	<b>MAC M9</b> <b>Proposal Map 9</b>	ED060 P25
S14	SJ	<b>BRYN BLAEN</b> 2km NW of Llangurig	<b>MAC M9</b> <b>Proposal Map 9</b>	ED060 P26
S15	SK	<b>BRYN TITLI</b> 1.5km SE of Llangurig	<b>MAC M9</b> <b>Proposal Map 9</b>	ED060 P27
S17	SL	<b>WAUN DDUBARTHOG</b> North of Bwlch y Sarnau	<b>MAC M10</b> <b>Proposal Map 10</b>	ED060 P29
S18	SM	<b>DRYSGOL</b> 3.5km north of Rhayader	<b>MAC M9</b> <b>Proposal Map 9</b>	ED060 P30
S19	SN	<b>BWLCH Y SARNAU</b> 1km SW of Bwlch y Sarnau	<b>MAC M9 &amp; M10</b> <b>Proposal Map 9 &amp; 10</b>	ED060 P31
S21	SO	<b>LLANDEGLE Y RHOS</b> 1.5km south of Llandegley	<b>MAC M12</b> <b>Proposal Map 12</b>	ED060 P33
S22	SP	<b>GILWERN HILL</b> 2.5km north-west of Frank's Bridge	<b>MAC M12 &amp; M14</b> <b>Proposal Map 12 &amp; 15</b>	ED060 P34
S28	SQ	<b>NANT FAWR</b> 2km north of Lower Chapel	<b>MAC M15</b> <b>Proposal Map 16</b>	ED060 P40
S29	SR	<b>LLANDYFALLE HILL</b> 2km east of Lower Chapel	<b>MAC M15 &amp; M16</b> <b>Proposal Map 16 &amp; 17</b>	ED060 P41
S32	SS	<b>CAMLO HILL</b> 4km north-east of Rhayader	<b>MAC M11 &amp; 12</b> <b>Proposal Map 11 &amp; 12</b>	ED060 P44
S33	ST	<b>DDYLE</b> 1km north of Abbeycwmhir	<b>MAC M10 &amp; 12</b> <b>Proposal Map 10 &amp; 12</b>	ED060 P45

We understand that Powys County Council has tried to make the evidence available and cannot revise consultation documents at this stage but we would be most grateful if you would look at the documents we have mentioned in order to appreciate the problems for the Powys public.

In the interests of a fair and user-friendly consultation process, we would also be grateful if you could ensure that Powys County Council adds this letter to the website and provides some guidance to the public on how to search the Examination website documents and respond about particular solar LSAs.

Yours sincerely,

Jonathan Colchester

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