

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
27.P5	Clwyd Powys Archaeological Trust			18/01/2019	<input type="checkbox"/>	E	C	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: RHL Boundary changes and LSAs

Item Question Representation Text

1 Details

You should be aware that Cadw are in the process of revising the boundaries of the Registered Historic Landscapes. Following on from the original publication of the RHL boundaries Cadw undertook an exercise of characterization which resulted in the drawing or character areas based on the defined RHLs. Some of these character areas extend outside the originally drawn RHL boundaries and it is these extensions that Cadw are now intending to incorporate into the Registered Historic Landscapes. Consequently, some of your LSA boundaries will now overlap with those of the revised RHLs. Given that WG guidance regarding development in and adjoining RHLs is fairly rigorous you may wish to consider revising your LSA boundaries to avoid the new RHL boundaries, or at the very least include text in the SPG to alert developers to the required ASIDOHL2 procedures that may be necessary in order to assess impacts of renewable energy developments on the historic landscape. I can supply the expected boundary revisions if these would prove useful.

495.P1 Llangors Community Council

22/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Queries the lack of consideration of the need for electric vehicle infrastructure in the SPG

Item Question Representation Text

1 Details

Llangors Community Council are concerned that this SPG takes us into 2026. PV type generation will advance and battery storage will become the norm, as the policy indicates.

In 2040 or 2032 if the Green Alliance and others lobby hard enough, both Diesel and Petrol cars will be banned from sale. Nothing is said about the electricity infrastructure (which currently will not cope) to charge all the proposed electric vehicles. There will be a need for charging points at each property or multi points in housing developments, car parks, public places, hotels, visitor attractions etc.

How are village communities to plan for tourists needing a top up charge? Where will they plug in? How will people in roadside accommodation with on street parking manage, will there be charging leads over pavements? Will remote charging points need to be consulted on and planning permission granted?

In planning for the future, perhaps these issues should be addressed in this LDP SPG?

Link below for further information

<https://www.westernpower.co.uk/news-and-events/latest-news/charging-ahead/>

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
537.P1	Welshpool Town Council			14/02/2019	<input type="checkbox"/>	E	C	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: In support of LSA at Pool Quay

Item Question Representation Text

1 Details

Renewable Energy

The Committee considered the proposals for renewable ene (sic), in particular with regard to solar panel sites. There is a site proposed for the land between Pool Quay (River Severn) and the railway line.

The Committee SUPPORTS this proposal but would suggest that planting to form a screen would be advisable.

4589.P1 NATS Safeguarding

14/01/2019 E C W M

Additional material submitted

Council Officer: AH

Document:Renewable Energy SPG

Summary: Provision of information for applicants

Item Question Representation Text

1 Details

Please find attached some FAQs on the potential impact of wind turbines on NATS's aviation infrastructure. We would be grateful if this information could be disseminated to applicants, or included, or referenced within your own guidance in order to assist applicants for wind turbine applications.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
4601.P1	SP Energy Networks			20/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks amendment to 1st sentence of para 9.6.1 re grid connections

Item Question Representation Text

1 Details

Comment 1
Para 9.6.1 1st sentence

Grid connections are a planning consideration. The point it seems to be made is that grid connection is not a determination by Powys Council. It is suggested that the first sentence should be amended as follows:

In many cases the technical details of the connection of a renewable / low carbon energy proposal to the electricity distribution grid will not be a [insert new text; matter for Powys County Council to determine and instead sit with Welsh Ministers or the UK Government Secretary of State for Energy] [to delete; planning consideration].

4601.P2	SP Energy Networks			20/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	--------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks additional text to lasst sentence of para 9.6.1

Item Question Representation Text

1 Details

Comment 2
Para 9.6.1 last sentence

There is stated UK policy relating to undergrounding of electricity lines defined as Nationally Significant Infrastructure Projects (NSIPs) in National Policy Statement EN-5 and Welsh Government policy in PPW 10 para 5.710. Both sets of policies recognise that a balanced approach must be taken between the level of the landscape and visual impacts of overhead lines with the increased costs of undergrounding and other environmental impacts from undergrounding. In addition, the type of grid connections (11kV and 33kV) required to support the proposed developments referred to in the Renewables SPG are typically of a type and design (single wood) that are commonplace in the landscape already and indistinguishable from the network used to supply existing homes and businesses. The sentence should be amended to:

Preference will be for sub-surface connections where possible. However, a balanced view must be taken of the level of the landscape and visual impact of the type of overhead lines proposed against the costs and other environmental impacts of undergrounding and mitigation. Proactive engagement with energy companies and the public to mitigate the visual impacts of transmission lines should take place.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
4601.P3	SP Energy Networks			20/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks insertion of new para at 9.6.2 regarding grid connections

Item Question Representation Text

1 Details

Comment 3
New para 9.6.2

NPS EN-5 and PPW 10 both encourage planning authorities to plan positively for grid infrastructure. PPW says Development Plans should facilitate the grid infrastructure required to support the areas identified for renewable energy and that planning authorities and system operators should engage with each other to ensure development plans take grid infrastructure into account.

Furthermore, whilst SP Energy Networks has previously engaged with Powys County Council on renewable energy matters including available grid capacity, there is no reference at all in the Renewables SPG to this issue. There is a particular concern given the extent of the information provided in the SPG in relation to the Local Search Areas for Solar Farms. There are opportunities to utilise and upgrade existing infrastructure corridors for improving network capacity and this should be reflected in the plan. It is suggested that a new para is added to say:

[New para; 9.6.2 New grid connections to connect renewable energy generation will need to have regard to the existing grid network capacity. Where there are gaps in the network to facilitate connections for the renewable energy planned in this SPG, Powys County Council will work with network operators to utilise existing upgraded infrastructure corridors for the required connections. Preference will be given to proposals for upgrading existing grid network and proposals for sharing new network to avoid a proliferation of new networks.]

4601.P4	SP Energy Networks			20/02/2019	<input type="checkbox"/>	E	C	W	M	
----------------	--------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeking further engagement with PCC on SPG contents

Item Question Representation Text

1 Details

Comment 4

SP Energy Networks is currently seeking to engage with Powys County Council regarding this SPG and would welcome further discussions on the above and related points prior to the adoption of the SPG. The above comments are submitted as an initial response and SP Energy Networks may wish to add or withdraw these in due course as further information comes to light.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
4911.P1	Savills			22/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG should better reflect the strategic direction laid out in national policy & guidance etc

Item Question Representation Text

1 Details

We welcome the consultation on the draft SPG on renewable energy. These representations are made by Savills as a property services firm with a team of specialist energy and infrastructure planners and in the context of a number of renewable energy interests in the area.

Although the draft SPG is prepared directly in the context of the LDP, The Well-being of Future Generations (Wales) Act 2015 and Towards 2040: The Powys Well-Being Plan are both directly relevant and provide contemporary context of the significance of a low carbon economy and the potential contribution of the renewable energy sector and associated uses. Renewable energy is a thread through the Towards 2040 Plan, and specifically referenced in the 12 well-being steps, including to develop a carbon positive strategy that maximises green energy production and to attract inward investment into Powys.

The updated Planning Policy Wales (PPW) Edition 10 also provides clear direction for a positive approach to facilitating renewable energy and associated infrastructure. PPW states (paragraph 5.7.8) that the planning system should maximise renewable and low carbon energy generation, and associated uses.

Paragraph 5.7.18 of PPW states that:

"5.7.18 To assist in the achievement of these targets, local authorities must take an active, leadership approach at the local or regional level, by identifying challenging, but achievable targets for renewable energy in development plans. In order to identify a measurable target, which can be assessed and monitored, it should be expressed as an absolute energy installed capacity figure. This should be calculated from the resource potential of the area and should not relate to a local need for energy.

Paragraph 5.7.19 of PPW provides guidance on how these targets should be achieved and how these targets should be treated, stating that:

5.7.19 Planning authorities should consider the renewable energy resource they have available in their areas when formulating their renewable energy target, informed by an appropriate evidence base, and use the full range of policy options available, including developing spatial policies in their development plans. Targets must not be seen as maximum limits, but rather used as a tool to maximise available resource, and where proposals exceed the target they should not be refused." [Emphasis added]

It is in the context of this strategic direction that the draft SPG requires further consideration and development .

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
4911.P2	Savills			22/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG should include targets in line with PPW para 5.7.18

Item Question Representation Text

1 Details

Reflecting the policy direction at paragraph 5.7.18 of PPW, there is a need for the SPG to set an ambitious target for renewable energy generation, and for the SPG to recognise that these targets should not be seen as maximum limits (paragraph 5.7.19 of PPW).

Although the draft SPG refers to some of the relevant policy framework, including decarbonisation and targets on renewables, the draft SPG does not focus on Powys' potential and how the planning system can facilitate and maximise opportunities.

4911.P3	Savills			22/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	---------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG needs to consider how the technologies it lists will be better accommodated in future given the dynamism and innovation of the sector

Item Question Representation Text

1 Details

Whilst the SPG considers a broad range of renewable energy generation technologies such as solar, wind, anaerobic digestion, hydro-power, combined heat and power, district heat, and battery storage, the SPG should consider how these technologies are likely to come forward in a changing market (the changes to subsidy regimes for example). This may hybrid projects with co-location of multiple technologies, and co-location of generation and consumption. New and future technology should be considered, such as hydrogen, and also grid management projects including standalone battery storage and upgrades. The renewable energy sector is dynamic and innovative and the planning system needs to be responsive to this, including the spatial and scale consequences of the sector's evolution.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
4911.P4	Savills			22/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG needs to better reflect PPWs positivity and provide better guidance to maximise RE potential

Item Question Representation Text

1 Details

Whilst the LDP includes Policy RE1 (Renewable Energy) which sets the tests for proposals for renewable energy, it does not reflect the positivity in PPW:

"5.9.1 Planning authorities should facilitate all forms of renewable and low carbon energy development . In doing so, planning authorities should seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.

5.9.8 Planning authorities should support and guide renewable and low carbon energy development to ensure their area's potential is maximised. Planning authorities should assess the opportunities for renewable and low carbon energy in the area, and use this evidence to establish spatial policies in their development plan which identify the most appropriate locations for development . There should be a presumption in favour of development in identified areas, including an acceptance of landscape change, with clear criteria-based policies setting out detailed locational issues to be considered at the planning application stage." [Emphasis added]

Certainly, the potential for renewable energy development in Powys is greater than reflected in the draft SPG. The draft SPG includes coverage on constraints to development, which is certainly a useful reference point, but does not necessary reflect the planning balance indicated in PPW, and does not provide the guidance that would help maximise the potential in Powys.

I trust this representation is helpful and please do get in touch if you wish to discuss its contents further.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P27	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	C	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: General opening comments about the overall shortcomings of the SPG

Item Question Representation Text

1 Details

These comments were prepared by members of BRB-CPRW committee. We made extensive submissions during the LDP hearings and were disappointed that many of these were ignored however we recognise that the SPG relates to the adopted LDP and we warmly welcome the opportunity to comment.

General Comment. SPG is intended to add clarification and detail to LDP policy to assist all those involved in the planning process. Applicants and others need to know what information is required of applicants and need guidance as to what PCC may regard as "acceptable" or "unacceptable" harm.

SPG is not intended to repeat either PPW, Powys LDP, or other legislation except where there is a need to identify policy for reference purposes.

SPG should be concise and not contain repetition or "padding".

We do not think the SPG is clearly structured or informative enough to provide applicants and others with the enhanced guidance they will be seeking about RE in the Powys planning process.

"Monitoring" and "Impact assessment" are not mentioned although they are in the Landscape SPG.

5466.P28	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Entire UK Policy context section can be deleted as Wales WG policy is now primary legislation

Item Question Representation Text

1 Details

Policy Considerations and RE background.

(4.1) The entire UK policy context should be deleted because legal precedent has established that Wales WG policy is the primary legislation and when WG set new targets for Wales in 2017 of 70% electricity consumption to come from RE. Furthermore, SPG itself quotes from Renewable Energy Generation in Wales 2017 which shows that we had already reached 48%.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P29	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 4.1.4 is misinformed about Renewables Obligations, so needs rewriting

Item Question Representation Text

1 Details

(4.1.4) is seriously misinformed about Renewables Obligations. RO is now closed to "all eligible renewable technologies". While RO arrangements still apply to generating stations accredited in the past, the information is not relevant to Powys Planning Policy as stated above.
https://www.ofgem.gov.uk/system/files/docs/2018/04/ro_closure_guidance_-mar2018_final_0.pdf

5466.P30	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Document:Renewable Energy SPG

Summary: three paras in 4.2 require editing to remove superseded documents or targets

Item Question Representation Text

1 Details

(4.2) requires drastic editing as follows:
 (4.2.1 to 4.2.3) Considers superseded policy documents, e.g., these documents use figures and targets that are now outdated.
 (4.2.6) "Despite the positive indicators, further progress towards the 22.5GW installed capacity target by 2020/2025 identified in "The Low Carbon Revolution" (2010) has to be supported by policy and guidance at the national, regional and local levels."
 PPW does not quote this target and parameters now changed to 70% of consumption.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P31	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Requires deletion of superseded or repetitive detail in four paras in 4.3

Item Question Representation Text

1 Details

(4.3.2) Mention of ambitions in policy document, now superseded

(4.3.9) TAN 8 acknowledges that onshore wind power offers the greatest potential for achieving identified targets

These targets relate to superseded policy. Delete this sentence

(4.3.10) A Ministerial Letter in 2011 confirmed the ongoing commitment of the Welsh Government to limiting the development of large scale wind farms to the seven SSAs, and identifying indicative maximum capacities within each area. The Minister for Environment and Sustainable Development in his letter dated July 2011 revised the maximum capacities for each SSA. The TAN provides guidance on how such amendment may be undertaken.

Delete the underlined sentence which repeats the first sentence.

And

(4.3.3) suggests that protections only need be applied to designated areas and assets with statutory protection. This is at odds with Powys LDP (and draft Landscape SPG) and TAN 8 re areas outside SSAs, and PPW10 5.9.4.

5466.P32	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Superseded detail re EIA in paras 7.7.4, 7.6.6 and 9.5.1 needs to be deleted

Item Question Representation Text

1 Details

(7.7.4) (7.6.6) & (9.5.1) refer to outdated EIA regulations now superseded by EIA 2017 (Wales) Regulations and an outdated UK planning circular.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
5466.P33	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Headings in Section 7 require clarification to remove confusion about types of, and search areas for RE

Item Question Representation Text

1 Details

Section 7 includes a heterogeneous set of headings – some about types of renewable energy and some about search areas for types of renewable energy. This reinforces the general impression that SPG items are rabbits pulled out of a hat rather than being part of a comprehensive structured guidance to RE in the planning system. The search area information should be presented in sub-headings under the appropriate type (wind, solar).

5466.P34	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Section 9 omits odours and air pollution

Item Question Representation Text

1 Details

Section 9 does not include odours or specifically mention air pollution (ammonia or traffic fumes associated with AD/Biomass).

5466.P35	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks clarification about who undertakes LSCA

Item Question Representation Text

1 Details

(9.1.3) & (9.2) LCSA. Landscape Sensitivity and Capacity Assessment. A Capacity assessment for renewable energy types was undertaken by Aecom (Powys REA) and subsequently a landscape sensitivity exercise was incorporated by EnPlan for solar energy alone. Neither an applicant nor PCC (without extensive consultant input) is able to provide LCSA.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P36	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Querying inclusion of LSCA within Section 9

Item Question Representation Text

1 Details

(9.2.2) We were expecting to see LCSA mentioned in the Draft Landscape SPG but it is not.
<https://naturalresources.wales/guidance-and-advice/environmental-topics/consultations/our-own-consultations/landscape-sensitivity-and-capacity-assessment/?lang=en> NRW Landscape sensitivity and capacity assessment is an approach used in spatial planning where the details of specific development proposals and sites are not known etc.
 The inclusion of LCSA in Section 9 throws doubt on the authors' grasp of fundamental planning issues.

5466.P37	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Document:Renewable Energy SPG

Summary: Querying why Cumulative Impact issues are confined to visual issues in para 9.4.3

Item Question Representation Text

1 Details

(9.4.3) Cumulative impact assessments should not be confined to visual issues.

5466.P38	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Queries why there is no mention of protecting historic landscapes in para 9.7.3

Item Question Representation Text

1 Details

(9.7.3) No mention of protecting historic landscapes.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P39	Brecknock and Radnorshire Committee of the Campai			24/02/219	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Wind section needs to describe the increase in turbine size over time since TAN* was written

Item Question Representation Text

1 Details

Wind energy in Powys

The wind section in general needs to describe the progressive increase in turbine size since Tan 8 was written and many existing turbines were built.

5466.P40	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Queries the ignoring of Aecom's findings re Wind LSAs from section 7, whereas the solar findings are set out in para 7.3

Item Question Representation Text

1 Details

(1.0.3) "In the Powys LPA area...demand for more wind farms is expected to continue over the coming years". The Powys LDP was based on a revised REA commissioned from Aecom. The specific findings of this report which related to Wind Local Search Areas, as opposed to Strategic Search Areas, should be clearly set out in the SPG. The revised REA findings re Solar LSAs are set out in (7.3) but the findings about Wind LSAs are ignored in Section 7.

5466.P41	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	C	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: 1st bullet of para 4.3.11 - notes that Powys has never established separation distances

Item Question Representation Text

1 Details

(4.3.11) It is notable that Powys has never established suitable criteria for separation distances as in first bullet point.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
5466.P43	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Queries the conclusions re the use of EIA within Table 3 in section 9.5

Item Question Representation Text

1 Details

(9.5 Table 3) The bottom line: wind vs Indicative thresholds and criteria, suggests EIA would be less likely to be required for a four turbine development generating under 5MW. This would be extremely likely to have significant environmental impacts and to cover a large area.

5466.P44	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	---	--	--	------------	--------------------------	---	---	---	---	--

Document:Renewable Energy SPG

Summary: Requiring consistency in referencing of the LSA, and more detail required in Table A1

Item Question Representation Text

1 Details

Solar Energy in Powys

(Appendix 1) Solar LSAs are described by numbers on each map. Several maps have more than one numbered LSA and this alongside reference within the text to the two-letter classification, as used in the LDP, is confusing. This is particularly so for LSA SL, which is mapped with several other entire LSAs. Referencing consistent with that within the LDP is essential.

It should be clearly stated that the two highest categories in Table A1 were excluded from the solar LSA list.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P45	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Paras 7.5.2, 7.5.3 and 7.5.5 variously require more detail, clarification, qualification and/or rewording

Item Question Representation Text

1 Details

Anaerobic Digesters in Powys

(7.5) This AD section reads as a general simplistic, and rather optimistic, copy and paste essay on ADs which completely fails to give any clear advice as to if and when planning applications are required for ADs. The authors of the report have not addressed the relevance of ADs to the Powys Planning System.

ADs have been responsible for very serious pollution episodes in Powys and elsewhere in Wales.

While digestate may be suitable for land-spreading, this will depend on many factors including concentration of pollutants in the digestate.

(7.5.2) refers to “non-point source pollution associated with agricultural practices”. Why not say “potential pollution arising from manure and slurry spreading” which people will more readily understand?

(7.5.3) “also other engineering and bio-chemical solutions”. The reader requires specific guidance and not generalisations.

(7.5.5) Poultry units are hardly “restricted to particular areas” in Powys. The notion that ADs are invariably an environmentally friendly way of dealing with manure/slurry and other animal products needs qualification, particularly as chicken manure (so super-abundant in Powys) is too dry for ADs without addition of more liquid matter or water, itself a scarce resource.

5466.P46	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Queries the omission of detail concerning LPA planning permission from Appendix 2

Item Question Representation Text

1 Details

(Appendix 2) is about the NRW environmental permitting regime and does not mention LPA planning permission.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P47	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Appendix 3 requires clarification to avoid confusion when compared to Appendix 2

Item Question Representation Text

1 Details

RE and Domestic Permitted Development (Appendix 3) is called RE and Domestic Permitted Dev. and is about planning permission. When compared to Appendix 2, this is confusing to the point where it must be questioned whether the authors are also confused about the respective roles of Powys LPA and NRW. This issue needs to be clearly addressed in the SPG.

5466.P48	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Concerns about apparent lack of transparency in SPG preparation and lack of detail re the Impact Assessment in paras 3.0.2 & 3.0.3

Item Question Representation Text

1 Details

Public accountability in SPG preparation

(3.0.2) publication of a selective summary of public responses does not make for a transparent process.

(3.0.3) there is no description of what kind of "Impact Assessment" is referred to. The impact assessment should be specified and should be included within the SPG consultation document.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
5466.P49	Brecknock and Radnorshire Committee of the Campai			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 4.3.11 should be clarified and reconciled with para 9.12.

Item Question Representation Text

1 Details

Community benefits

(4.3.11) this quote from Tan 8 is not at all clear re community benefits. Although TAN 8 does say something like this, it is impossible to understand without looking at Annex B of Tan 8. This section should be reconciled with (9.12).

(9.12.2) '... however, where appropriate, developers may be in a position to provide benefits to help compensate for [deleted; alleviate] any negative consequences.' Community funds do not "alleviate" disbenefits. We suggest rewording as above.

5831.P1 Bellamy, Mr David

24/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opinions expressed towards individual LSAs (in favour and against).

Item Question Representation Text

1 Details

I object in the strongest manner against the proposal to erect solar panel fields on Llandegley Common because:

- This area is one of outstanding natural beauty, used by many for recreation, walking bird-watching, sketching, photography and other activities, an amenity of immense value to both local people and visitors;
- It stands beside the A44, one of the main arteries into Mid-Wales used by visitors, and trashing our beautiful landscapes in this manner will send a clear message to visitors that we don't care a fig about our natural landscapes and why do you bother to come here?
- Following the strength of protest against the Henty wind factory it must be obvious even to the most myopic of planners that this area is much valued by locals, and to most intelligent people to propose erecting further industrial structures is purely vindictive and fuelled by excessive greed;
- It will seriously affect wildlife, especially the birds, given the enormous numbers of starlings present;
- Given that we are leaving the EU we will need all the land available for food and stock – we can't simply live solely on leeks.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
5911.P19	Scottish Power Renewables			25/02/2019	<input type="checkbox"/>	E	C	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Comment re the importance of supportive local policies in order to realise national intentions

Item Question Representation Text

1 Details

SPR COMMENTS ON DRAFT SUPPLEMENTARY PLANNING GUIDANCE – RENEWABLE ENERGY

New development

As referenced within the draft SPG, Planning Policy Wales states that onshore wind energy will continue to a key part of meeting the Welsh Government’s vision for future renewable electricity production. Given the clear policy intention at national policy level, it is vital that the Powys Local Development Plan translates this into supportive policies for new and repowered wind energy developments at the local level.

5911.P20	Scottish Power Renewables			25/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	---------------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG needs to be more cognisant of the changing national policy context (NDF) etc, rather than the out of date TAN8

Item Question Representation Text

1 Details

We note the ongoing work on the National Development Framework (NDF) for Wales which will replace the existing Welsh Spatial Plan and set out where nationally important infrastructure is needed. The NDF will also provide direction for Strategic and Local Development Plans and support the determination of Developments of National Significance in Wales. This will include the identification of spatial areas suitable for new onshore and solar PV projects. Given this ongoing work, and the potential update or replacement of Technical Advice Note 8 (TAN8), we would therefore ask that the Powys LDP and SPG is cognisant of the changing national policy context of infrastructure and does not include overly restrictive policies based purely on the Strategic Search Areas identified in TAN 8 (2005).

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
5911.P21	Scottish Power Renewables			25/02/2019	<input type="checkbox"/>	E	S	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Supports the inclusion of repowering paras within the SPG, eg para 9.10.2

Item Question Representation Text

1 Details

Repowering

As well as continued support for new renewable energy developments, including new onshore wind, solar and energy storage projects, there is also a need to encourage more efficient use of existing onshore windfarm schemes. This may include blade extensions, modifications to wind turbines, as well as the repowering of sites with larger turbines, with a view to increasing their efficiency, with the promotion of compatible uses such as solar and energy storage.

We welcome recognition within the draft SPG, that there will likely be a number of situations where developers will seek to repower older wind farms coming to the end of their life span, or in situations where newer more efficient turbines would provide much greater yields. As noted in section 9.10.2 of the draft SPG, this is in line with Planning Policy Wales. We welcome the statement that the existing use of the site will be treated as a material consideration and would therefore suggest that a proportionate approach to level of scrutiny of the location, scale and design of the repowered wind farm will be applied to ensure consistent decision making in line with Government policy aspirations.

6160.P9	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	C	W	M	
---------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: General comments re the SPGs failings

Item Question Representation Text

1 Details

Thank you for the opportunity to comment on the RE SPG.

I am concerned that overall the document reads more as a treatise on legislation and policy than an aid to interested parties to understand what will make a proposal acceptable and the requirements that will need to be submitted with any application.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6160.P10	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Entire UK Policy context section can be deleted as Wales WG policy is now primary legislation.

Item Question Representation Text

1 Details

4.1 DELETE THE ENTIRE UK POLICY CONTEXT.

REASON: WG implement UK legislation through their planning policy. Legal precedent has established that in Wales WG policy is the primary legislation.

It is nonsense and confusing to quote UK policy targets established in 2009 when WG set new targets for Wales in 2017 of 70% electricity consumption to come from RE. Furthermore, SPG itself quotes from Renewable Energy Generation in Wales 2017 which shows that we had already reached 48%.

6160.P11	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Three paras in 4.2 require editing to remove superseded documents or targets.

Item Question Representation Text

1 Details

4.2 EDIT MUCH OF THESE PARAS

PPW does not refer to any of these documents in their RE chapter

4.2.1 to 4.2.3 Considers superseded policy documents, eg, these documents use figures and targets that are now outdated.

4..2.6 "Despite the positive indicators, further progress towards the 22.5GW installed capacity target by 2020/2025 identified in "The Low Carbon Revolution" (2010) has to be supported by policy and guidance at the national, regional and local levels."

PPW does not quote this target and parameters now changed to 70% of consumption.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P12	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Requires deletion of superseded detail involving four paras in 4.3.

Item Question Representation Text

1 Details

4.3.2 Mention of ambitions in policy document, now superseded

4.3.9 TAN 8 acknowledges that onshore wind power offers the greatest potential for achieving identified targets

These targets relate to superseded policy. Delete this sentence

4.3.10 A Ministerial Letter in 2011 confirmed the ongoing commitment of the Welsh Government to limiting the development of large scale wind farms to the seven SSAs, and identifying indicative maximum capacities within each area. [The Minister for Environment and Sustainable Development in his letter dated July 2011 revised the maximum capacities for each SSA.] { The TAN provides guidance on how such amendment may be undertaken. }

DELETE [red sentence]

EDIT { highlighted sentence }: move to 4.3.9

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6160.P13	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Inclusion of 'national in para 6.1.3, and storage as a technology in para 6.1.4

Item Question Representation Text

1 Details

6.1.3 Whilst permitted large-scale (>25MW) onshore wind energy within the TAN 8 Strategic Search Areas (SSA) is likely to make a substantial contribution to national renewable energy targets in the Powys planning area, Welsh Planning Policy advises that development plans should support a diverse range of renewable energy projects and ensure that an area's potential to accommodate them is realised.

EDIT to include "national". REA established that only 4MW additional wind capacity in PCC area.

6.1.4 The Council prepared a Renewable Energy Assessment (May 2017) informed by the Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon energy – A Toolkit for Planners (2015) to be in accord with National Policy. Other than wind power and solar PV farms, hydro-power schemes, biomass / CHP and anaerobic digesters are three examples of potentially viable renewable technologies that could be capable of delivering renewable energy at a commercial scale and would be generally supported by the Council.

EDIT Should include storage as a technology.

6160.P14	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Requires deletion of passage within para 7.1.1

Item Question Representation Text

1 Details

7.1.1 Policy RE1: Renewable Energy covers the development of all types of renewable and low carbon energy. Policy criterion 1 is concerned with wind farms [of 25MW and over]{delete and the approach to be taken within the Strategic Search Areas (SSAs). } Policy criterion 2 is concerned with the approach to be taken within the identified Local Search Areas (LSAs) for solar PV development, while criteria 3, 4 and 5 are applicable to all renewable / low carbon technologies.

EDIT as in red

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P15	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Superseded detail re EIA in para 7.7.4

Item Question Representation Text

1 Details

7.7.4 Welsh Government Circular 11/99 is a useful reference in determining whether a wind energy development is likely to require an EIA, and covers other associated planning issues. Individual wind turbines with a hub height exceeding 15 metres and windfarms of more than two turbines are listed under Schedule 2.3(i) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

EDIT This para includes guidance and EIA regs that are superseded. EIA regs now The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. 11/99 Guidance is outdated as new EIA regs have some new parameters to assess for environmental effects. Also 5 turbines or over 5MW is a nonsense in that modern turbines could reach over 5MW with 2 turbines.

6160.P16	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Amendments to para 7.7.5 re EIA screening opinion

Item Question Representation Text

1 Details

7.7.5 For turbines and developments of this size, an Environmental Impact Assessment (EIA) is not mandatory but the Council will provide a 'screening opinion' on request, indicating whether an EIA is required, based on whether the development is likely to give rise to significant environmental effects.

EDIT An EIA is not mandatory for sch 2 development but it is mandatory for the LPA to undertake a screening opinion. It is for the developer to choose whether to request one before submitting an application.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P17	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Remove reference to outdated policy in para 7.8.6

Item Question Representation Text

1 Details

7.8.6 The Welsh Government's Energy Policy Statement (2010) confirms a target of 1GW installed capacity of electricity generation from biomass by 2020.

EDIT refers to outdated policy

6160.P18	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 7.9.4 regarding storage should also consider strategic resources as in SP7

Item Question Representation Text

1 Details

7.9.4 Any development proposals for renewable energy storage facilities should be sensitively sited, and measures should be taken to minimise any visual and noise impacts on local residents associated with the operation of the plant and movements of vehicles if applicable.

EDIT Storage should also consider strategic resources as in SP7

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P19	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Clarify application of EIA in para 9.1.3 (and typo in para 9.1.2)

Item Question Representation Text

1 Details

9.1.2 but the information requested by the Council is are likely to include:

EDIT typo

9.1.3 Development specific considerations will have to be addressed through a Landscape and Visual Impact Assessment (LVIA), the Environmental Impact Assessment (EIA) and the application design statement.

EDIT This reads that all development will need EIA

6160.P20	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Recognition that significant receptors may not be local people in para 9.3.2

Item Question Representation Text

1 Details

9.3.2 These impacts should be identified in relation to significant receptors (local residents or communities) as well as the wider landscape generally

EDIT Significant receptors may not be local people, they could be for example rights of way users or heritage assets.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P21	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Clarification re the purpose of an LVIA required in para 9.3.3

Item Question Representation Text

1 Details

9.3.3 The impact upon visual amenity can be a subjective one, but ultimately can be measured as being people's responses to a change in the composition of views as a result of changes within the landscape.

EDIT The purpose of an LVIA is to assess visual amenity objectively having followed the steps in the GLVIA.

6160.P22	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Suggestion to reword para 9.3.4 to reflect regular updating of guidance referred to

Item Question Representation Text

1 Details

9.3.4 Guidelines for Landscape and Visual Impact Assessment; Third Edition, April 2013 (GLVIA3);

EDIT This is the valid guidance as of now, guidance is regularly updated.

SUGGEST which is expected to adhere to the most recent edition of the Guidelines for Landscape and Visual Impact Assessment;

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P23	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Parass 9.5.1 and 9.5.2 refer to superseded EIA regs or outdated guidance

Item Question Representation Text

1 Details

9.5.1 Some renewable energy development proposals require an Environmental Impact Assessment (EIA) under Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (known as the 'EIA Regulations'). These regulations implement the EU's Environmental Impact Assessment Directive 85/337/EEC as amended by 97/11/EC and 2003/35/EC.

EDIT Refers to superseded EIA Regs

9.5.2 Welsh Government Circular 11/99 states

EDIT Outdated guidance

6160.P24	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	----------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 9.12 requires clarification

Item Question Representation Text

1 Details

9.12.2 however, where appropriate, developers may be in a position to provide benefits to help compensate for alleviate any negative consequences

EDIT community funds do not "alleviate" disbenefits. SUGGEST red wording.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6160.P25	Bond, Ms Sarah			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Requiring consistency in referencing of the LSA, and more detail required in Table A1.

Item Question Representation Text

1 Details

APPX 1

TABLE A1 EDIT Remove very high landscape sensitivity. LSAs in this category were removed for the adopted LDP.

MAPS It is disappointing that the mapping contains numbered LSAs whilst the individual LSA heading refers to the lettering system adopted in the LDP. This is confusing, particularly for LSA SL which is mapped with several other entire LSAs.

6193.P1	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: General criticism of SPG and need of more specific guidance within it

Item Question Representation Text

1 Details

Thank you for the opportunity to comment on the Draft Renewable Energy SPG. Our overall comment is that it relies overmuch on recitation of Policy. As a working document we feel there needs to be more specific guidance as to assessments required and what constitutes acceptable in order that the relevant Policies in the LDP are adhered to and unacceptable harm does not result.

6193.P2	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Need for unambiguous cross referencing to other SPG and policies

Item Question Representation Text

1 Details

In particular we consider there needs to be unambiguous cross-referencing to specific sections and paragraphs of other SPGs, in particular Landscape, and Policies such as Tourism and Cultural Heritage.

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6193.P3	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeking statement saying no further capacity for wind outside SSAs

Item Question Representation Text

1 Details

Landscape is of major importance where large RE installations and transmission infrastructure are to be considered. Landscapes form the settings that draw in visitors and it is recognised that landscape is ' the central reason why visitors choose to holiday in Wales'. Tourism depends on the quality and experience of our natural resources and cultural heritage. Place-based products and services have long-been recognised as adding value.

Landscapes provide the settings for our lives and the context for physical activity and outdoor recreation. Easy access for all, to high quality landscapes and their benefits, means that all landscapes matter. Furthermore, landscapes can provide a distinct and positive sense of place identity around which people can come together.

We are mindful that the adopted Powys LDP unequivocally states that Powys' greatest asset is its varied, outstanding landscapes. Such a resource requires the highest level of consideration in planning particularly where large scale renewable installations with far reaching impacts are concerned.

The preparation of the LDP included an assessment of the potential for new solar and further wind development in the County. A number of solar LSAs were identified following this assessment but it was concluded there was no potential for wind LSAs once all material factors had been taken into account.

Proposed change: At an appropriate point the SPG should state in terms that following a full assessment it was determined that there was no further capacity for windfarms in Powys outside of the SSAs.

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6193.P4	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks qualification to sentence in Para6.1.1 and additional wording re grid connectivity to limit development

Item Question Representation Text

1 Details

6.1.1 The county may be 'well located in terms of tapping into renewable sources of energy' for small community schemes that can provide energy used at source. We would agree there is indeed potential for such schemes however, larger, commercial schemes require Grid proximity. Normally the industry considers build uneconomic and transmission losses unacceptable (particularly with renewable sources where outputs are relatively low) for energy projects to be situated more than 10kms from the Grid. That there are very few sites suitable for large scale renewables that are proximate to the Grid is clearly demonstrable, as in the Powys assessment for wind LSAs.

The Local Area Network has no further capacity to take energy production so any increase for export would require significant and industrialising build out.

The further issue of the siting of transmission infrastructure and sub-stations in rural areas of such high landscape sensitivity and terrain as much of Powys needs to be addressed in the SPG.

Suggested alteration: that the statement be amended to - 'well located in terms of tapping into renewable resources for small community projects. The absence of Grid connection will limit the development of larger, commercial projects.'

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6193.P5	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Need for full assessment processes for all RE in light of the age of TAN8

Item Question Representation Text

1 Details

7.2 TAN8 is now 15 years old and designation of SSAs took no account of :

- landscape
- socio-economic factors such as tourism, essential to the economic well being of our communities
- heritage assets
- Grid proximity (in Mid Wales; this was considered in other parts of Wales and significantly large areas removed as a result)
- the public consultation responses
- access issues

Technological changes have been such that turbines are now 3 times higher than in 2003 so have a far grater visual and sensory impact. The authors themselves (Arup and Partners) considered TAN8 would have to be reviewed within seven years and also that each LPA must carry out its own refinement exercise on the SSAs taking into account all other local factors and that following this refinement it was unlikely all the land identified would prove suitable for wind energy.

SSAs are Search areas only and there can be no presumption in favour of development without consideration of other material planning considerations.

On-shore windpower is one of the most intrusive forms of renewable energy with impact over the largest area and Over-reliance on an outdated Advice Note (TAN 8) is unjustified given the lack of an adopted refinement exercise for SSAs in Powys.

Suggested change: RE developments of any size must be subject to the same Landscape Policy and Guidelines as any other development if the noted high quality of landscape and its economic and well being importance to the region is to be maintained. LVIA's and LSCA must be carried out in all cases alongside assessment of impact on socio-economic factors such as tourism, heritage assets, highways and other access issues, carbon storage peat and dark soils; HRA assessment where appropriate and potential for disturbance of watercourses and water absorption that could result in downstream flooding. None of these aspects were considered in designation of SSAs.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6193.P6	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks inclusion of restrictions for local use of energy and local supply of materials for paras 7.4-7.10

Item Question Representation Text

1 Details

7.4 - 7.10 We broadly support the investigation of the potential of other renewable energy and heat resources but there need to be clear assessment criteria.

Suggested change: preferred schemes will produce energy for local use and preferred schemes will not involve the transfer of materials for long distances which is both carbon counterproductive and often incompatible with the structure and safety of rural roads.

6193.P7 Montgomeryshire Committee (Campaign for the Protec

21/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Acknowledging importance of Storage but wants more guidance and cross referencing in para 7.9.4

Item Question Representation Text

1 Details

7.9.4 Storage: Guidance required on how this is to be achieved important here as this is emerging technology and potentially will require large structures and considerable land take in exposed areas. Again reference should be made to use of the Landscape SPG.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6193.P8	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Need to include consideration of certain listed impacts and Public RoW in para 9.1

Item Question Representation Text

1 Details

9.1 Impacts on communities and individual dwellings must include consideration of area of visibility (ZTV requirement); cumulative impact; the disturbing element of movement for wind turbines and the impact of any required transmission / storage infrastructure. The impact on visitors to the area and tourist accommodation should also be factored in here.

We strongly endorse the inclusion of impacts on tourism, recreation and public access and the inclusion of bridleways. Suggested change: Public Rights of Way are included in terms for the avoidance of doubt.

6193.P9	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Protection of heritage assets from transmission infrastructure and in para 9.1.4

Item Question Representation Text

1 Details

Suggested change: inclusion of Conservation Areas under Historic Environment. It is often transmission infrastructure that has the greatest impact on heritage assets and their setting and this should be specifically mentioned, in addition to inclusion at 9.1.4.

6193.P10	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	S	W	M	
----------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Supports LCSA in addition to LVIA in para 9.2

Item Question Representation Text

1 Details

9.2 We welcome the requirement for an LSCA in addition to an LVIA and agree they provide assessment against different parameters

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

6193.P11	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks inclusion for views both into and out of proposed dev to align with Landscape SPG in para9.3.2

Item Question Representation Text

1 Details

9.3.2 In order to align with the Landscape SPG this paragraph should clearly state views and panoramas both into and out of the proposed development.

6193.P12	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	S	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Supports inclusion of cumulative assessment requirement in para 9.4.3

Item Question Representation Text

1 Details

9.4.3 We welcome both the requirement for cumulative assessment and this clarification on inclusion.

6193.P13	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks sentence in para 9.5.3 to be given greater prominence with its own numbered para

Item Question Representation Text

1 Details

9.5.3 The sentence under Table 3 regarding other legislation and Regulations is of sufficient importance to be given its own separate numbered paragraph for clarity.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6193.P14	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 9.6 wholly insufficient as it ignores important impacts

Item Question Representation Text

1 Details

9.6 Is wholly insufficient. As stated above transmission and grid infrastructure has the potential to have as much, and on occasion greater, impact than the energy generator itself and often over a greater area. It would avoid all doubt if the criteria to be considered were expanded and set out clearly as at 9.1. The impact on communities, tourists, residential amenity and PRoWs for example has been completely omitted.

6193.P15	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Concerns over decommissioning wording in para 9.10.1 and seeks change to para 9.1

Item Question Representation Text

1 Details

9.10.1 Needs to include removal of Grid and transmission infrastructure following decommissioning of generation plant with sufficient de-commissioning bond to cover all costs.

If concrete bases for infrastructure and turbines in wind developments are not to be removed then their permanent impacts on hydrology and ecology of upland areas must be a prime consideration in the planning application process. Unlike the turbines themselves where visual and landscape amenity may, eventually, be restored, the bases and their environmental impact are a permanent feature.

Proposed change: this is included at 9.1 as a subsection 'impact of any permanent infrastructure on the ecology and hydrology of the area.'

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

6193.P16	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Concerns over transparency re financial considerations and their influence on decision making in para9.12.2

Item Question Representation Text

1 Details

9.12.2 Financial considerations such as community benefits must not , as stated, impact on the decision making process.

Proposed change: It would be more transparent if this was strengthened by stating that potential community benefits or other monetary gains must not be alluded to in any planning application but may form part of Planning Obligations determined after conditional planning consent has been granted to ensure they form no part of the decision making process. Any application should be decided on its own merits and acceptability alone.

6193.P17	Montgomeryshire Committee (Campaign for the Protec			21/02/2019	<input type="checkbox"/>	E	O	W	M	
-----------------	--	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Need to state that para9.11 will be kept under review to comply with any new legislation

Item Question Representation Text

1 Details

? 9.11 This section may need to be kept under review in the eventuality of legislation on lighting of the now considerably higher wind turbines. For example, in most of Europe this is obligatory for turbines over a certain height with considerable landscape, visual and dark skies impact. Such legislation would inevitably affect decision making on proposals.

Suggested change: clearly state that this section will be kept under review in line with any new legislation on lighting requirements for windfarms.

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6323.P1	Innogy Renewables UK Ltd			20/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Overall focus of the SPG

Item Question Representation Text

1 Details

Paragraph 1.0.4 states that at a "local level, this SPG largely focuses on solar photovoltaic energy generation (solar PV)..."
 As an overall comment, Innogy would like to highlight that this seems contradictory to a number of later statements within the SPG document, which draw upon national planning guidance including Planning Policy Wales and Technical Advice Note 8 (TAN8). A number of examples of such statements are provided below. Furthermore, the SPG should provide more consideration to onshore wind due to the fact that a number of Strategic Search Areas lie within the Council's administrative area.
 •Paragraph 4.3.3 states "It is stressed that development of all forms of renewable and low carbon energy should be facilitated by Local Planning Authorities (LPAs) which should seek to ensure that their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved."
 •Paragraph 4.3.9 states that "TAN8 acknowledges that onshore wind power offers the greatest potential for achieving identified targets..."

6323.P2	Innogy Renewables UK Ltd			20/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	--------------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Out of date information about support mechanisms

Item Question Representation Text

1 Details

Paragraph 4.1.4 gives out of date information about the support mechanisms available for renewable technologies and should be amended as follows:
 'The UK Government provides financial support for renewable energy generation through the Renewables Obligation and Feed in Tariff schemes. The Contracts for Difference (CfD) scheme is [insert; now] the government's main mechanism for supporting low-carbon electricity generation.
 CfDs incentivise investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high. [struckthrough; In Wales], [insert; T]he 'Renewables Obligation' places an obligation on electricity suppliers to generate a certain portion of electricity from renewable sources and is regulated by the 'Office for Gas and Electricity Markets' (Ofgem). [insert; The Renewables Obligation scheme closed to all new generating capacity on 31st March 2017.] [struckthrough; Eligible renewable technologies include wind energy; hydro-power; tidal and tidal stream energy; wave energy; photovoltaics; geothermal; all biomass material; landfill gas; sewage gas; and co-firing of biomass with fossil fuel.]

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6323.P3	Innogy Renewables UK Ltd			20/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Correction required to terminology

Item Question Representation Text

1 Details

Paragraph 9.8.1 advises that "...electrical [struckthrough; cabling] [insert; connections] should wherever possible be underground or carried [insert; predominantly] on wooden poles." This statement should be amended as highlighted as cables are by default underground in the terminology of network operators.

6323.P4	Innogy Renewables UK Ltd			20/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	--------------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Obligations regarding decommissioning

Item Question Representation Text

1 Details

Paragraph 9.10.1 provides onerous obligations on developers in relation to decommissioning. To remove all infrastructure, including tracks, and restoring the site to its condition 25 years earlier may not be practical, sensible or realistic, depending upon the changes that have taken place at the site in the intervening years (access tracks may, for example, be utilised for other purposes and guidance on site restoration may have changed significantly). It is suggested that this paragraph be amended to include a statement such as 'notwithstanding this aspiration, decommissioning will take place based on the actual environmental impacts and current best practice prevailing at the time'.

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6323.P5	Innogy Renewables UK Ltd			20/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Planning obligations and community benefits

Item Question Representation Text

1 Details

Paragraph 9.12.1 states that "Planning Policy Wales supports commercial developers of renewable energy schemes working together with community based organisation. Where a proposal is acceptable in land use terms and consent is being granted, the Council may wish to engage in negotiations to secure community benefits through planning obligations."

Planning obligations should only be sought where they are necessary; relevant to planning; directly related to the proposed development; fairly and reasonably related in scale and kind to the proposed development; and reasonable in all other respects (Welsh Office Circular 13/97). Annex B of TAN8 draws a clear distinction between benefits that enable a development to proceed (e.g. highway improvements, habitat management and mitigation) and benefits that are outside the planning process (e.g. community benefit funds). The former would meet the tests of Circular 13/97 however the latter would not, and the Council should not engage in negotiations on voluntary contributions which are outside the planning process.

This paragraph speaks positively about community involvement in projects, which may, for example, take the form of shared ownership. In accordance with paragraph 5.916, bullet point 3 of PPW10, the net economic benefits of shared ownership are a material consideration that planning authorities should take into account. It would therefore be welcome to see Powys County Council take a supportive approach to proposals featuring shared ownership within this SPG.

Paragraph 9.12.2 states that "Community benefits in the form of financial contributions must not impact on the decision making process (PPW 10 – para 5.9.22), however, where appropriate, developers may be in a position to provide benefits to help alleviate any negative consequences and to ensure the community benefits from the development." In some cases, a financial contribution may meet the tests of Circular 13/97, e.g. payments to overcome adverse impacts on television or radar, or a financial obligation related to decommissioning and site restoration.

Both the title of Section 9.12 (Community benefits and ownership) and the wording of paragraphs 9.12.1 and 9.12.2 should be reworded to draw a distinction between a) benefits directly related to the development proposed (be that financial or otherwise) that make a development acceptable (i.e. ones that meet the tests of Circular 13/97); and benefits which are not (i.e. ones that fail to meet the tests of Circular 13/97). It would be clearer if this section was separated into three distinct elements (1. Mitigation (financial or in kind); 2. Community Benefit Funds, and 3. Shared Ownership) as it is impossible to address them coherently under one heading.

6395.P1	Canal and River Trust			04/02/2019	<input type="checkbox"/>	E	C	W	M	
---------	-----------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: No Comment

Item Question Representation Text

1 Details

Thank you for your consultation in relation to the draft Landscape and Renewable Energy SPGs. Glandŵr Cymru, the Canal & River Trust in Wales, (the Trust) have reviewed these documents and have no comments to make on the draft documents.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6445.P1	Harris, Mr George			10/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Objection to Llandegley Rhos LSA

Item Question *Representation Text*

1 Details

My objection relates to The Solar PV Farm Search Areas identified in the Powys LDP.(pg.50)

Specifically, with regards to the proposed Llandegley Rhos location. Acknowledging that PCC amended the ambitious Wind Farm proposals in the original LDP, this decision was taken prior to the disastrous outcome that is now The Hendy Wind Farm project.

In view of this outcome that Llandegley Rhos is already being desecrated, this proposal of further development should be removed from the local search area for solar development.: -

It is an area of beauty in danger of becoming an industrial landscape. It includes an area of ancient common land, there are graziers that have rights. Notwithstanding the impact the impact on wildlife

PLEASE REMOVE LLANDEGLE Y RHOS FROM THIS LIST. ENOUGH IS ENOUGH.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6513.P1	Keal, Jenny			17/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Objection to Llandegley Rhos LSA

Item Question Representation Text

1 Details

Page 52 of Powys Local Development Plan – Renewable Energy SPG Consultation Draft January 2019

I would like to object strongly to the designation of land near Llandegley Rhos as suitable for large scale solar panel developments.

This is a an area of very high value landscape and fragile ecology, with many species vulnerable to industrial style solar parks, including a large starling roost, nesting curlews and several species of raptor.

There are several scheduled monuments in the area which would be degraded by the presence of industrial solar panels.

Part of the outlined area is Llandegley Rhos, Common Land used by local graziers and the public and as such should be exempt from industrial development. This land was given in Perpetuity in 1885 to the people and cannot be developed.

During the FFC's of the LDP consultation process this area was specifically excluded from the LSA's for renewable energy projects and it is hard to believe that it is now under threat after so many people worked hard to protect it.

This is an area well used by ramblers, bird watchers, cyclists, and tourists and as such is an important asset to the local tourist businesses. It MUST not be degraded further.

6591.P1	Horsburgh, Peter			14/01/2019	<input type="checkbox"/>	E	X		N	
---------	------------------	--	--	------------	--------------------------	---	---	--	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: NDM mentions Renewable Energy

Item Question Representation Text

1 Details

Thanks you for this – but with Leslie Griffiths riding rough-shod over all county, local and expert opinions and judgements concerning, for example, the Henty windfarm approval, why should we waste our time (and you, yours) with this sort of stuff?

If all local opinions, representations and legal niceties are going to be ignored, why bother?

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6724.P1	Open Spaces Society (East Powys Local Correspondence)			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opinions expressed towards individual LSAs (in favour and against).

Item Question Representation Text

1 Details

Solar energy panels on common land and across or near rights of way - Llandegley

LSA SO: LLANDEGLE Y RHOS

We object to the inclusion of Llandegley Rhos as an area for solar panels. These must not go onto the Common Land taking away the rights of the graziers and the public to enjoy, or on the enclosed lands which have rights for the public. The area is an important wildlife habitat with many species of birds including ground nesting ones, and other mammals and invertebrates in and around its many little streams and pools.

There are public rights of way across the area in many directions, including some which are on the Enclosure Awards and are going to be subject shortly to claims to be included on the Definitive Map.

6746.P4	Parc Cenedlaethol Eryri / Snowdonia National Park			22/02/2019	<input type="checkbox"/>	E	C	W	M	
----------------	---	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: recognition that the effect any RE development (such as wind turbines) would have on the NP would be included within the Landscape SPG

Item Question Representation Text

1 Details

Comments on the Supplementary Planning Guidance – Renewable Energy

Although there doesn't appear to be a direct reference to the National Park in the document, or the effect that a development such as wind turbines would have on its setting and/or scenery in or outside of the Park, we accept that this would come under the Landscape SPG which would note the need to protect and consider the effects on the Park when assessing developments.

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6758.P1	Dale, Azra			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opinions expressed towards individual LSAs (in favour and against).

Item Question Representation Text

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

1 Details

Adopted Powys Local Development Plan 2011-2026
 Draft Supplementary Planning Guidance (SPG) Consultation
 SECTION 2: Comments and suggested changes on the draft Renewable Energy SPG as follows:
 After reviewing the information about Powys County Council's requirements to fulfil renewable energy targets in accordance with UK, Welsh Government and it's own policies I must say that I do not agree with the policies themselves which in my opinion are based upon false science created to support a narrative which well serves corporate interests locally, nationally and internationally. This policy can be tracked back to the Earth Summit held in Rio de Janeiro in 1992 at the behest of Canadian billionaire Maurice Strong when the Agenda for the 21st Century also known as Agenda 21, was officially launched. I am not a "climate change denier", a term the green lobby likes to use. In my opinion the only constant in all forms of life is change. What we are seeing and experiencing here now is yet another cycle within cycles of shifting conditions on earth. In fact, many scientists have been commenting for years that we are overdue for a "mini ice age". A number of truly independent scientists that are not financed by corporate interests who have a huge vested interests in perpetuating the global warming scare promulgated by Al Gore, are predicting a solar minimum by 2020. It is of note that the climate alarmists parroting the global warming narrative had to change their official terminology to "climate change". I love this land and this earth and seek to protect and preserve it. Littering the landscape here, there and everywhere with wind turbines and solar arrays nor electric vehicles is not the answer. Solar and wind power are intermittent and unreliable sources of energy which require back-up power systems. As such they have a complex relationship with the power grid and can in fact create more problems than energy. As a result the situation arises whereby wind turbine developers are given constraint payments, to not operate. These constraint payments are tacked onto our ever increasing electric bills as tariffs which we residents pay for. These back-up power sources necessarily involve electricity produced from coal and gas, along with on-site diesel generators for both wind turbines and solar arrays. In fact, according to research, turbine and solar 'farm' operators are able to make even more profit from the subsidies paid for operating diesel generators which necessarily require fuel storage tanks on-site. These are some of the many reasons why wind and solar are not a viable source of "renewable energy" nor are they clean nor green. Even Bill Gates agrees that unreliable wind, solar and batteries are not the answer. <https://www.youtube.com/watch?v=9xe3BWPsBTU>
 The fact is that the mining in China of rare earth minerals "essential to advanced technology, from smartphones to GPS receivers, but also to wind farms and, above all, electric cars" produces highly toxic waste which causes massive environmental damage and fatal diseases including cancer and leukemia. <https://www.theguardian.com/environment/2012/aug/07/china-rare-earth-village-pollution>
 The push for renewable energy in my opinion, and many others, is not about saving the planet nor is it in the best interests of humanity, myriad species and this earth. It's all about money, power and control.
 Upon reviewing the Draft Supplementary Planning Guidance (SPG) Consultation I noticed that Llandegley Rhos is now included in the Local Search Areas (LSA) as identified in Section 7.3.3, Table 1 on page 13 of the Renewable Energy Consultation Document. The description for Llandegley Rhos as a potential LSA for solar arrays is described as a

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

landscape of medium sensitivity in the Appendix 1 chart at page 50 of the SPG document. I strongly object to the inclusion of Llandegley Rhos in particular in Powys' Local Search Areas for Solar PV 'Farms'. This is particularly so given what has and continues to occur with the abomination that is Hendy Wind Farm wherein Powys CC, with the Welsh Government's support has by all appearances and actions enabled the developers to construct an 110 meter (360ft 10.7 inches with Blade diameter of 82 meters (269ft 0.35 inches), identified as Turbine 5 on Llandegley Rhos in breach of all pre-commencement planning conditions. This has required the use, alteration and interference with Llandegley Rhos Common land without the necessary permissions in place. Powys CC has also allowed the Hendy WF developer to hastily construct, without even bothering to submit plans nor applying for planning permission from Powys CC or the Highways department, what is in my opinion an illegal entrance to gain wider access to the track on Llandegley Rhos Common from the A44 trunk road. In doing so, they have cut down trees and ripped out a hedgerow in an area where there is most likely to be protected species including but not limited to Otters, Great Crested Newts and water voles. No environmental studies were done. As such I consider the Hendy Wind Farm an unlawful development.

And

The outstanding natural beauty of Powys along with the ancient history it has preserved and protected for centuries make it one of the most highly favoured tourist destinations in the world. Tourism along with farming are the primary source of revenue for the majority of Powys residents. As such, the livelihoods and lives of a high percentage of the resident population will be changed for the worst if renewable energy developments, are allowed to proceed without upholding and enforcing the safeguards which Powys CC purports to have in place. Again, I must mention the current reality of how Powys CC does not follow it's own guidance as exemplified by the myriad infractions which in my opinion and many others, have been committed by Hendy WF without any enforcement of planning rules and regulations by Powys CC. This situation sets a dangerous precedent which cannot be allowed to happen again. It can be shown with substantive evidence that the Hendy WF development on Llandegley Rhos and Common has already had a detrimental impact upon the following:

- Farming • Tourism • Noise
- Health • Wildlife • Traffic
- Environment • Water • Bats, birds, bees etc.
- Infrastructure • Quality of Life • Property blight
- Irreplaceable Archeology & historic landscapes

The common land, stunning landscapes, hydrology, protected and endangered species, schedule monuments and ancient relics, possibly yet unknown in Powys must be protected and preserved for future generations, rather than desecrated and destroyed, raped and pillaged as has been the case at Hendy WF and many other areas without any proper enforcement of planning rules and regulations. From my observations and research it is apparent that Powys CC has allowed the wishes of City of London and other wealthy developers to supersede those of it's residents and protection of this ancient sacred land, with all that it holds and nourishes. This situation must not be enabled to continue by Powys CC, the Welsh and UK Governments.

I worked for many years in litigation. So-called legally binding agreements like the

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
renewable energy ones are made. They can also be amended and/or broken, dissolved.										

6758.P2	Dale, Azra			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks amendment to para 6.1.5.

Item Question Representation Text

1 Details

Given this history I do not trust Powys CC to fulfil their mandate and take measures to properly protect and preserve Llandegley Rhos and Common. This is particularly so when at 6.1.5 of the SPG I note it is stated that: "Developers should always seek to involve the Council at the outset of any development proposals." I strongly feel that this should be revised to state that "Developers are required to involve the Council at the outset of any development proposals in a transparent manner, with we resident taxpayers knowledge and easy access to information." Having said this, my faith and trust in Powys CC has been severely tainted by it's handling of the Hendy WF matter, which is ongoing.

6758.P3	Dale, Azra			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Seeks amendment on page 7 re Strategic Resources.

Item Question Representation Text

1 Details

I appreciate the inclusion of the Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets at page 7 of the SPG. In my opinion there should be a caveat included to ensure enforcement of safeguarding measures. This is particularly so given that these safeguarding guidelines have not been nor are being followed in relation to the Hendy WF development on Llandegley Rhos and Common.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6758.P4	Dale, Azra			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Amendment to para 9.1.2 re enforcement of items listed

Item Question Representation Text

1 Details

Section 9.1.2 of the Powys LDP SPG outlines and lists a number of important "considerations" for areas involving potential renewable energy proposals and developments. Given the sensitive nature of many areas of Powys, including Llandegley Rhos and Common I feel strongly that there should be a caveat requiring enforcement of all of the items listed.

6827.P1 Martin, Caroline and Jamie

24/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opposed to wind turbines and solar in Powys landscape.

Item Question Representation Text

1 Details

We are against industrialisation of Landscape in Powys by Wind Turbines and Solar unless they are placed in already unarguably already Industrialised zones.Since Powys has few such places we think this will not occur.
 Powys has great Landscape value and Powys CC should do all it can to preserve it from dictat by Politicians and Developers. These misguided and greedy people should educate themselves and not be allowed by their ignorance to spoil this land.
 When they do so they spoil the Landscape and the Ecology. They destroy not only beauty but habitat of plant, bird and animal life.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6847.P1	Njord Wind Developments Ltd, Bryn Blaen Windfarm Lt	Framptons		22/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG does not provide adequate guidance to developers, lacks information on how prejudice is determined, and will hinder development, so is inconsistent with guidance & policy

Item Question Representation Text

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

1 Details

1. The purpose of this Supplementary Planning Guidance is stated as being to 'provide practical information for officers, landowners, and the public involved in proposals for renewable energy' (2.0.1). A particular concern is the issue raised in Policy RE1 concerning prejudice to the purpose of the SSA in respect of windfarm development.
2. Policy RE1 Renewable Energy states:
 - '1. Within or close to the Strategic Search Areas (SSAs), proposals for wind energy greater than 25MW will be permitted subject to criteria 3 to 5; all other proposals for renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the SSA. (emphasis added)
 2. Within the Local Search Areas (LSAs), proposals for solar PV between 5 – 50MW will be permitted subject to criteria 3 to 5; all other proposals for renewable and low carbon energy will only be permitted where they can demonstrate they would not prejudice the purpose of the LSA.'
3. The SPG provides no practical information as to how 'prejudice' is to be assessed within the development management process.
4. The SPG places reliance upon the Welsh Government Ministerial Letter issued in 2011 as setting 'maximum appropriate figures for each SSA' (7.2.2 – 7.2.3). It is not clear from the SPG whether the approach of PCC is that any provision above the capacity figures identified in TAN8 is to be regarded as being objectionable as a matter of planning principle.
5. The 'indicative capacity targets for SSAs' (TAN8 Table 1) were based upon a typical turbine generation of 2Mw. Technological advancement over almost two decades (since the early stages of the research undertaken towards the preparation of TAN8) has now resulted in the provision of turbines of significantly greater output.
6. The SPG is inappropriate and inconsistent with PPW10 December 2018. Paragraph 5.9.1 states: 'Planning authorities should facilitate all forms of renewable and low carbon energy development. In doing so, planning authorities should seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.' (emphasis added)
7. The application of indicative capacities to the SSAs from TAN8 as a policy threshold for acceptability of any further windfarm development is inconsistent with PPW, and a proper application of the technical guidance within TAN8.
8. Properly read in accordance with the language used, the Welsh Government letter of July 2011 confirms the Welsh Government remains committed to achieving the potential for onshore wind energy development in the SSAs. The letter records that this potential was estimated in the Low Carbon Revolution Energy policy statement, and based on the maximum capacities assessed by independent consultants Garrad Hassan in the preparation of TAN8.
9. The Minister was not expressing the opinion of the Welsh Government that any windfarm development in excess of the capacities identified in TAN8 would necessarily be objectionable as a matter of national planning policy.
10. In re-writing national planning policy for energy in PPW 10, paragraph 5.9.8 states: 'Planning authorities should support and guide renewable and low carbon energy development to ensure their area's potential is maximised.'
11. With national planning policy (issued after the adoption of the Powys Local Plan) urging that a local authority area's potential is maximised, an exceedance of the inductive capacities identified in TAN8 cannot in itself be treated as being prejudicial to the purpose of the SSAs. The SPG should helpfully make this principle clear for all participants and in so doing would provide practical information.
12. The SPG provides no practical information as to how 'developers, landowners and the public' may understand the intended approach of the LPA in considering whether a particular proposal prejudices the purpose of the SSA. It is acknowledged that windfarms of greater than 25Mw are to be encouraged within the SSAs. This is a policy of concentration and not confinement to the SSAs. No practical information is provided in the SPG as to how a proposal for less than 25Mw within an SSA will be considered for the potential harm of prejudice to the purpose of the SSA.
13. Policy RE1 places an evidential burden upon an applicant to prove a negative. The SPG could usefully have assisted developers and landowners in setting out an approach that will be applied to enable the LPA to determine whether prejudice to the purpose of the SSA would arise from an individual proposal which is to be treated on its individual merits. The Criteria for Determining Renewable Energy Schemes (Section 9) is entirely silent on requiring any form of assessment of potential prejudice to the SSAs.
14. The primary purpose of the SSAs is to concentrate largescale windfarms (>25Mw), with an implicit acceptance of that there will be significant change in landscape character from wind turbine

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
-------------------	-------------	-------	--------------	-------------	-------	--------	------	------	--------	-----------------

development. Wind turbine developments of less than 25Mw will also give rise to some localised significant landscape effects. It is clearly not feasible for an applicant of a windfarm proposal to design and assess the environmental effects of other potential windfarm development across the SSA, and if a potentially acceptable scheme is identified, to then consider whether the particular proposal which the applicant wishes to bring forward might prejudice a potential >25Mw proposal - which is hypothetical in its existence.

15. Such an approach runs the risk of preventing smaller scale windfarm developments coming forward – in an area where significant landscape change is accepted – on the basis that a larger scheme may come forward in another location. As an applicant for an individual windfarm is unlikely to have access to other parcels of land, the analysis of the potential for a large >25Mw windfarm to be provided elsewhere within the SSA will invariably be less than robust. Furthermore, the potential costs in analysing the potential acceptability of large-scale windfarm development elsewhere within the SSA would be a serious disincentive to new windfarms of a lesser scale being brought forward.

16. In the absence of practical information on how to approach the issue of 'prejudice' the SPG does not 'support and guide' renewable energy development. Rather the policy has the potential to frustrate windfarm development of less than 25Mw on the basis a developer is not provided with any form of guidance as to how to demonstrate no prejudice would be caused to the purpose of the SSA.

6847.P2	Njord Wind Developments Ltd, Bryn Blaen Windfarm Lt	Framptons		22/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	---	-----------	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Use of the words 'should be' in para 7.2.4 does not properly reflect the wording of Policy RE1 or the intention of national policy.

Item Question	Representation Text
---------------	---------------------

1	Details
---	---------

17. Paragraph 7.2.4.

18. The first sentence states:

'Criterion 1 sets out the Council's policy requirement that large windfarms... should be located within or close to the SSA.' (emphasis added)

19. The use of the words 'should be' does not properly reflect the wording of Policy RE1 which provides support in principle for wind energy within SSAs (subject to Criteria 3 to 5). Policy RE1 does not preclude windfarm development in excess of 25Mw outside SSAs (and is therefore consistent with national planning policy PPW8 / TAN8).

20. Policy RE1 does not convey an objection in principle to large-scale windfarm development outside SSAs. The words 'should be located' imply such a policy limitation, and these words should be replaced with the words 'will be permitted subject to criteria 3 to 5'. This alteration would be consistent with the wording of Policy RE1, and in turn be consistent with national planning policy.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6871.P1	Martin, Mr Richard			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opposed to implementation of search areas.

Item Question Representation Text

1 Details

1. If I remember correctly, following much consultation and public hearings the LDP identified a total of 280 acres of LSAs for solar development. This has now been amended to 92.2 square kilometres, with apparently no further public hearings to discuss the matter!! Please explain how that can be justified.
2. PCC and WG should be looking at brown field sites for solar development, by which I mean roofs; industrial, domestic and farm roofs. There is no need whatever to use priceless wild land, and to contemplate this needless action is utterly irresponsible.
3. The implementation of search areas is a faulty concept, because it is bound to risk planning blight on properties in or near them. This is exactly what happened due to the wind power LSAs originally planned; a house sale near my own home fell through because the property was surrounded by a wind LSA, and it remained unsold for a further year. I am sure that this was not the only example.

6936.P1 Gibson-Watt, Marcia and Robin

22/01/2019 E O W M

Additional material submitted

Council Officer: AH

Document:Renewable Energy SPG

Summary: Objection to Llandegley Rhos LSA

Item Question Representation Text

1 Details

[Representation is in the form of an incomplete Newspaper cutting (Daily Telegraph 15/01/2019) regarding the colour of offshore windturbines in Kent]

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6967.P1	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	S	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Overall support for the SPG

Item Question Representation Text

1 Details

Overall we very much welcome this SPG. It provides us confidence that appropriate renewable energy technologies will have a suitable planning policy framework within Powys going forwards. However, we have a number of observations which have been set out below.

6967.P2	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	-------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: SPG should better recognise the potential benefits to economic regeneration and resilience arising from RE

Item Question Representation Text

1 Details

1.0.3: The rationale for supporting and encouraging renewable energy references the need to combat climate change and reduce our reliance on fossil fuels, However, we believe it is also worth referencing from the outset their potential for both economic regeneration and economic resilience. The local economic benefits derived through renewable energy should not be understated or undersold, with numerous studies* showing the positive local economic benefits that can accrue for these technologies in Wales. Much of this evidence also shows that additional economic benefits accrue when the system is of a community or cooperative ownership model. See also, 9.1.2

*The Economic and Social Impact of Small and Community Hydro in Wales (Jones et al)
<http://www.regenwales.org/upload/pdf/071015091201Impact%20of%20Small%20and%20Community%20Hydro%20in%20Wales.pdf>

*Energy and Development in the Periphery: A regional perspective on small hydropower perspectives (Jones et al, 2016).
<https://journals.sagepub.com/doi/abs/10.1177/0263774X16662029>

*The Economic Impact of Energy Transition in Wales, Institute of Welsh Affairs, (Jones, 2018). <https://www.iwa.wales/wp-content/uploads/2018/09/EconomicImpactofEnergyTransition-2.pdf>

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6967.P3	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Ministerial ambition (from Sept 2017 Statement) for local (or community) ownership should be recognised and referenced throughout the SPG

Item Question Representation Text

1 Details

4.2.5. Whilst it's very useful that you have mentioned the Ministers statement from Sept 2017 we feel that it would be appropriate to also reference the ministers ambition from the same statement that all renewable energy schemes from 2020 should have at least an element of local ownership and that this important statement should run throughout the entirety of the SPG. We acknowledge that the term local ownership is rather opaque (cynically, one can imagine a large corporation merely registering a company locally to tick the box), and would therefore recommend that clarity is sought from the Welsh Government on how this statement should be applied to the planning process and would also suggest that a less opaque term, such as community ownership, would be preferable. This would also go towards the Ministers other statement from Sept 2017 which looks for 1GW of renewable energy to be locally owned. We acknowledge that this is referenced within section 9.12.4, but feel that it is of such significant merit that it is given greater prominence throughout the entire SPG.

6967.P4	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	
----------------	-------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: More info on agricultural and forestry PDRights to be included in Appendix 3 as stated in para 8.1.1

Item Question Representation Text

1 Details

8.1.1. Non-Domestic Permitted Development Rights. The document references the fact that certain permitted development rights extend to agricultural and forestry land, and then references Appendix 3 for further information, however, these are not made mention of within the Appendix. The correct reference should be "The Town and Country Planning (General Permitted Development) (Amendment) (Wales) (No.2) Order 2012" which sets out the criteria for permitted development rights on hydropower turbine houses and boiler houses etc.

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
6967.P5	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: para 9.6 could include more info and guidance on when and where PP is required for grid connection

Item Question Representation Text

1 Details

9.6 Grid connection. We welcome the clarity given in this section, but would suggest that it would be beneficial to state that systems (even very small ones) that don't connect through a residential property will require planning permission for the grid connection works. This would therefore set out clearly the requirements of people looking to develop a renewable energy system.

6967.P6	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	-------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Could include info in para 9.9 on policy implications of jointly owned/managed AD plants using poultry waste

Item Question Representation Text

1 Details

9.9 Waste. With the proliferation of chicken farms across Powys it may be appropriate to set out within this section the policy implications of a number of users (eg farmers) working together to form a jointly owned and managed anaerobic digester for their waste. We see this as an area of potential growth within the next LDP period, and specific reference to its policy implications would be useful.

6967.P7	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	
---------	-------------------	--	--	------------	--------------------------	---	---	---	---	--

Council Officer: AH

Document:Renewable Energy SPG

Summary: Suggest removal of 25 year requirement to decommission in para 9.10.1 as this may be unnecessary for schemes (such as Hydro) that are built to last much longer

Item Question Representation Text

1 Details

9.10.1. We would suggest that the inclusion of the 25 year reference for decommissioning be removed, leaving only the reference to the end of a systems operational life. This would remove potential ambiguity for planning officers. We have seen examples (although not in Powys) where hydropower schemes have been given conditions to remove all works 25 yrs after commissioning, which, for a system with an operational life of over 50 yrs, has caused unnecessary paperwork in getting the inappropriate conditions amended. To avoid any potential confusion only one term should be used.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
6967.P8	The Green Valleys			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Para 9.12.1 welcomed but note it presents a good opportunity to underline community ownership / benefit as per Ministers statement (See also Rep P3)

Item Question Representation Text

1 Details

9.12.1. We welcome this statement, but feel it would be useful to include reference to a potential element of community ownership as well as community benefit (which links to the Ministers statement of Sept 2017 referenced earlier and in section 9.12.4).

6967.P9 The Green Valleys

24/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Need for more info on potential role of AD systems and/or district heating systems in the planning process, in delivering RE and waste reduction targets

Item Question Representation Text

1 Details

Siting of Anaerobic Digesters. There is no mention within the document of the role AD systems could play in a well-designed Local Development Plan. We feel that an aspiration for AD and/or district heating systems to be incorporated into the analysis of outline development sites for housing would be very useful in delivering the Welsh Governments renewable energy and waste reduction targets and their inclusion in site analysis would greatly increase their likelihood in coming to fruition.

Consultation Draft Renewable Energy SPG Representations

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

Rep'n/Para/Policy	Representor	Agent	Accession No	Date Lodged	Late?	Source	Type	Mode	Status	Status Modified
7086.P3	Peter Richards & Co Ltd			21/02/2019	<input type="checkbox"/>	E	C	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Recognising the relationship between the SPG and national policy

Item Question Representation Text

1 Details

It is felt that the policies set out by Powys primarily reflect the policies and attitudes set out by National Policy

It is not felt that many changes are required to this policy given they are primarily based on existing policies.

It is felt that the council should be sure to be in line with National Policy as much as possible with renewable energy to ensure that it can be delivered but all Environmental Impacts are adequately covered and mitigated.

It is appreciated that local policies such as typical landscaping will be required to be considered.

7087.P1 Sephton, Mr & Mrs Stephen & Lynne

24/02/2019 E O W M

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opinions expressed towards individual LSAs (in favour and against).

Item Question Representation Text

1 Details

We would like to object in the strongest possible terms to the application for solar farms in the Llangurig area.

The recent non functional build of the wind farm is over industrialisation of the Cambrian Mountains and is now being considered for even more devastation of our beautiful countryside.

1. The destruction of wildlife
2. Would be visible from the Clywedog Dam
3. The destruction of more bog leading to flooding into the River Wye and Severn
4. Devastating effects on tourism
5. Not enough sun in Wales to have a considerable contribution to the grid

Consultation Draft Renewable Energy SPG Representations

by: Representation No

Filtered to show: (all of) Stage=P; Status<>D; Document=Renewable Energy SPG

<i>Rep'n/Para/Policy</i>	<i>Representor</i>	<i>Agent</i>	<i>Accession No</i>	<i>Date Lodged</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>
7088.P1	at request of Representor, Withheld			24/02/2019	<input type="checkbox"/>	E	O	W	M	

Council Officer: AH

Document:Renewable Energy SPG

Summary: Opinions expressed towards individual LSAs (in favour and against).

Item Question Representation Text

1 Details

PAGE 50

LSA SO: LLANDEGLEY RHOS

S21

1.It seems to me that open-season has been declared on the Llandegley Rhos area since Powys County Council's almost unanimous rejection of the Hendy Wind Farm and the subsequent planning enquiry which decisively upheld that decision were summarily dismissed by Lesley Griffiths.

2.I object most strongly to this new threat of a solar development further despoiling this area of outstanding natural beauty. Such a development cannot fail to have a detrimental visual impact on the area.

3.If solar development is permitted to go-ahead in areas which will already be blighted by huge turbines, are we to assume that all such developments will be constructed in tandem?

4.Please note that I do not want my name to be published.