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Assembly Member for
Brecon and Radnorshire

Cllr Avril York
Portfolio Holder for Regeneration and Planning
Powys County Council
County Hall
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Cynulliad National
Cenedlaethol Assembly for
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Dear Cllr York

I write with regard to the **Further Focussed Changes and proposed changes to the Local Development Plan, including the proposed inclusion of local search areas for wind and solar energy, and the revised policy (Policy RE1) in relation to renewable energy.**

I have serious concerns about the inclusion of these sites, the methodology used to identify these sites and also the lack of time that residents have had to respond to the draft changes.

1. Methodology

It is clear that the 'Local Search Areas' have been produced without any consideration of local material planning factors, such as landscape quality, accessibility, connectivity potential to the grid, land ownership, etc. At the very least, land carrying official protective designations, such as SSSIs, SACs, Special Landscape Areas, etc. should have been excluded. I am aware of at least one area that contains an SSSI, which indicates that the high-level analysis has not been as robust as it should have been. I am aware of one area that has been included that is owned by the National Trust (NT) and the NT does not allow large-scale wind farm development on its property.

It is obvious that the areas identified need to be refined and need to take into account the information available from Natural Resources Wales on LANDMAP on landscape characteristics, qualities and influences.

I suspect that the draft LSAs will bear little or no resemblance to the final versions that will appear in the LDP. However, the inclusion of vast swathes of unsuitable land in the current draft LDP has caused deep concern and anxiety within local communities. What's more, it does little to reassure communities that Powys County Council has the competence to find renewable energy solutions that best fit individual communities.

2. Alternative Sources of Renewable Energy

I am concerned that about the apparent inconsistency, that the above methodology has exposed, in the consideration of the various types of renewable energy generation that are to be used to achieve Powys' 'contribution'. Why hasn't more been done to identify the potential for hydro-power generation? The stunning Powys landscape includes several very considerable heads of water that could be harnessed to provide significant, efficient green energy.

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I do not believe that the reason of grid connectivity infrastructure constraints, applied to hydro-power consideration, should be used as an excuse not to harness this energy source; these constraints apply equally to wind turbines and solar panels placed on barren landscape with little or no industrialisation. Powys could be a pioneer of hydro power given the incredible natural resources at its disposal. Residents could have an Authority that was leading the way in using efficient ways to harness renewable energy, an Authority to be proud of, rather than one that they feel they need to fight against constantly.

I would add here that more consideration also needs to be given to micro and community-based energy generation and the part that this could potentially play in the 599MW REA contribution. We have some very successful community micro energy schemes in Powys, such as Talybont Hydro Energy Scheme, which could be used as examples for other communities to establish their own schemes.

3. Lack of public accountability

The proposed changes have caused much public concern across communities in Powys. Many constituents feel that the consultation period for these major changes to the LDP has been unreasonably short, meaning that residents have not had enough time to evaluate and respond to the changes.

It is clear to me that due to the time constraints being placed on the Council, major and very far-reaching changes are being introduced with insufficient time for the Council to properly consult with the residents and communities of Powys.

In conclusion, I believe that we need to maximise contributions from heat, hydro and biomass instead of relying solely on wind to meet our renewable energy targets in Powys. I believe that the identification of 'Local Search Areas' has been rushed and the areas need to be refined to take account of land ownership, material planning factors, LANDMAP information and the responses from local communities.

Thank you for your consideration of the above points.

Yours sincerely



Kirsty Williams AM