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## Powys Local Development Plan (LDP) 2011-2026

### Further Focussed Changes Representation Form, October 2016

It is recommended that representations are made on this standard form. More copies are available at Powys Council offices and at local libraries where the Schedule of Further Focussed Changes is available for public inspection or online at [www.powys.gov.uk](http://www.powys.gov.uk) (Planning Policy/LDP pages).

Please complete Sections 1 and 2 of this standard form; it only needs to be done once. For Section 3 you will need to use a **separate** form for each representation on each Further Focussed Change that you wish to make and attach it to sections 1 and 2.

Send your completed form to:

**Powys LDP Team**  
**Planning Policy**  
**Powys County Council**  
**The Gwalia,**  
**Llandrindod Wells,**  
**LD1 6AA**

or via email to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk)

Representations must be received by **5.00 pm, Monday 21<sup>st</sup> November 2016**.

Representations at this stage must **only relate to the Further Focussed Changes**. Representations should not propose further changes to the Deposit LDP 2015 or the Focussed Changes January 2016; any such representations will be disregarded as they should have been made during the earlier stages of the Plan preparation. Duly made representations will be forwarded to the Planning Inspectorate for consideration by the Inspector appointed to examine the soundness of the Plan.

### Group Representations

Where there are groups who share a common view on how they wish to see the LDP changed, it would be very helpful for the group to send a single representation which represents that view. (Repeating the same points numerous times will not add weight to the case being made). Groups should indicate how many people they represent and how the representation has been authorised. The group's representative should be clearly identified.

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Please note that information provided in Sections 2, 3 and 4 will be made publicly available. Personal information, as provided in Section 1, will be treated confidentially.

**Section 1: Personal Information** (This will not be publicly available)

	Your Details	Agents Details (if applicable)
<b>Name:</b>	1. Peter Seaman, Chair Brecon & Radnor Branch 2. Christine Hugh-Jones 3. Jill Kibble 4. Margaret Tregear 5. Wendy Toomey	
<b>Tel:</b>	01874 676225	
<b>Fax:</b>		
<b>Email:</b>	Peter.seaman@btinternet.com	
<b>Signature:</b>	<i>Pete Seaman</i>	
<b>Date:</b>	21 <sup>st</sup> November 2016	

**Privacy Statement**

Personal Data will be processed in accordance with the Data Protection Act 1988. We will only use the information for the purpose of the LDP process.

By submitting a representation, the following personal information may be placed in the public domain including publication on the Powys County Council website: Your name, organisation / company, address, and your representation.

All personal telephone numbers and email addresses will be treated as confidential.

Powys County Council accepts the following responsibilities for personal information recorded:

1. The information will only be used for the agreed reason and will be looked after securely.
2. The information will only be kept for as long as needed or to comply with statutory requirements and will then be securely destroyed.
3. If the information has to be shared with other agencies initial consent will be gathered at this point and explicit (signed) consent will be obtained by the service / department concerned as soon as possible. Unless we are obliged by law to disclose the information.

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Detailed guidance can be found on our webpages – search Freedom of Information - or from the Information Management Team.

## Section 2: Contact Details

	Your Details	Your Agent's Details (if applicable)
<b>Name:</b>	1. Peter Seaman, Chair Brecon & Radnor Branch  2. Christine Hugh-Jones  3. Jill Kibble  4. Margaret Tregear  5. Wendy Toomey	
<b>Organisation/Company:</b>	The Montgomery, and Brecon & Radnor Branches of the Campaign for the Protection of Rural Wales	
<b>Address:</b>	c/o Brynhyfryd, Scethrog, Brecon, Powys	
<b>Postcode:</b>	LD3 7EQ	

From this point onwards please use a separate representation form for each Further Focussed Change you wish to make a comment on. All representations made will be available for the public to view.

## SECTION 3: Commenting on the Further Focussed Changes:

### 3a. Which document are you commenting on:

Please tick one:

- Schedule of Further Focussed Changes: An Addendum to the Powys Local Development Plan Deposit Draft 2011-2026 (October 2016)
- Sustainability Appraisal Report (October 2016)
- Environmental Report (Strategic Environmental Assessment) (October 2016)
- Habitat Regulations Assessment Screening of Further Focussed Changes (October 2016)

### 3b. Which Further Focussed Change are you commenting on?

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When making a comment or representation, it is important you tell us which Further Focussed Change you are commenting on.

Please remember to use **one form per representation**.

Further Focussed Change Number

**FFC8**

Paragraph Number (Particularly if commenting on the Sustainability Appraisal, Strategic Environmental Assessment or Habitat Regulations Assessment)

LDP Objective 5 ii

### Section 3c: Your Comments and Suggested Changes

**Please set out your comments below using additional sheets as necessary.**

Explain why you object to or support the identified Further Focussed Change. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issue you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that she may raise.

Is your comment an objection X  support  comment  ? (Please tick)

Please use the space below to set out your representation:

We object to the rewording of LDP Objective 5 ii. We believe that the ‘contribution’ of 600MW – a figure not stated here - which has been identified for renewable energy generation within the county over the next ten years is excessive and based on unsound evidence, and to attempt its delivery will result in certain environmental harms. See response to FFC79.

We believe also that the wording of this objective is inappropriate. Stating that there is an objective to ‘deliver’ rather than, for example ‘endeavour to deliver, in so far as is compatible with other LDP objectives’ implies that delivery of renewable energy **must** happen even where evidence shows the policy and the target and corresponding objective to be incompatible with other LDP objectives. It is also almost a given that easily measurable targets will trump targets which are less easily evidenced and will be pursued at their expense. This incompatibility undermines the soundness of the LDP.

There is no clarity as to what national targets Powys is contributing to, and what % share of those targets Powys is intended to come up with.

It is also the case that the target, not stated here, is not only too high but also imprecise. Why is it stated in MW when depending on the technology applied the outcomes in GWh will differ? Where is the clarity of

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outcome in that? Are there individual targets for each technology? Otherwise it is possible that this objective will lead to a damaging concentration on the easiest and most profitable technologies regardless of suitability or environmental impact.

The objective (with implied target) as worded is unclear, incompatible with other LDP objectives and makes unclear and unspecified reference to national targets. It is therefore unsound.

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Outline what changes are needed to the Further Focussed Change to make the LDP sound:

The target underlying Objective 5 has itself to be clarified in order that a sensible plan objective can be applied to its achievement. When this has taken place the Objective will need to be rephrased along the lines:

“ii. Endeavour to deliver, so far as is compatible with and does not compromise other LDP objectives, the county’s contribution...”

And then set out the contributions according to technology.

I am enclosing further supporting information and material.

#### Section 4: After making your representation

Receipt of your representation will be acknowledged by the LDP team at Powys and it will then be forwarded directly to the Planning Inspector.

Everyone that wants to change the Plan can request to appear before and speak to the Inspector at a ‘hearing session’ during the public Examination. However, you should bear in mind that your “written representations” on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

**a) Do you want your comments to be considered by “written representations” or do you want to speak at a hearing session of the public examination? (Please tick one of the following):**

**i)** I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

**ii)** I want to speak at a hearing session.

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X

**b) If you wish to speak, please explain what you wish to speak to the Inspector about.**

As above

If you wish to speak please tick which language you would like to be heard in:

English   X           Welsh     

**THANK YOU FOR YOUR COMMENTS**

Forms should be returned to: LDP Team, Planning Policy, Powys County Council, The Gwalia, Llandrindod Wells, Powys. LD1 6AA or emailed to [ldp@powys.gov.uk](mailto:ldp@powys.gov.uk) .

The closing date for representations is **5.00pm Monday 21st November 2016**. Representations received after this date will not be accepted.

Representations **on the proposed Further Focussed Changes** submitted during this consultation period (**Monday 10<sup>th</sup> October – Monday 21<sup>st</sup> November 2016**) will be forwarded to the appointed Inspector.