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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 (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

Representations must be received by **5.00 pm, Monday 21st 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)
Name:	1. Peter Seaman, Chair Brecon & Radnor Branch 2. Christine Hugh-Jones 3. Jill Kibble 4. Margaret Tregear 5. Wendy Toomey	
Tel:	01874 676225	
Fax:		
Email:	Peter.seaman@btinternet.com	
Signature:	<i>Pete Seaman</i>	
Date:	21 st 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)
Name:	1. Peter Seaman, Chair Brecon & Radnor Branch 2. Christine Hugh-Jones 3. Jill Kibble 4. Margaret Tregear 5. Wendy Toomey	
Organisation/Company:	The Montgomery, and Brecon & Radnor Branches of the Campaign for the Protection of Rural Wales	
Address:	c/o Brynhyfryd, Scethrog, Brecon, Powys	
Postcode:	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

FFC

96,99,101,102,104,105,106,107,109,110,111,112,113,117,120,130,140,147,148,149,150,151,152,160,166

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

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:

This response relates to FFCs 96, 99, 101, 102, 104, 105, 106, 107, 109, 110, 111, 112, 113, 117, 120, 130, 140, 147, 148, 149, 150, 151, 152, 160, 166

Full critique of the mapping process carried out by AECOM in August 2016, and on which the maps to which these FFCs relate are based, is contained within our response to FFC79.

All comments within response to FFC79 regarding the AECOM mapping apply equally to the ‘Proposals and inset maps, document number 45’ and must be read as relating to each of the Proposals maps FFCs listed above.

We would like to add here that we consider the presentation of these maps to be extremely unhelpful in

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informing the public of the scale and location of change to the county which can be expected to follow from implementation of the proposed policy RE1 and introduction of LSAs for the following reasons:

1. It is impossible to get an overall impression of the impact of new policy on the county, and the extent of land which is intended to lie with LSAs because each map shows an illogically and unsystematically chopped up little bit of the county and does not easily relate to maps before and after.
2. Strategic search areas are not shown on the maps thus underrepresenting the true extent of land to be devoted to energy generation in the county and materially misrepresenting the land use changes/designations which already have force within the county.
3. The complete extent of each LSA is never presented on one map – for several of the large solar search areas responders have to consult 3 separate maps to see the complete LSA and even then the picture is far from clear.
4. There is no explanation within the maps of what LSAs actually are and their likely impact on Powys residents.
5. There is no naming or numbering of LSAs to enable responders to refer to particular LSAs or to be sure that they have actually found all the proposed LSAs on the maps.
6. The maps present too much information, i.e. too many blocks of colour, for the LSA information to be easily distinguished.
7. Web document ‘Proposals and inset maps, document number 45’ does not even open at all for those who do not have a fast enough broadband speed. *(I have not ever been able to open this document from the web in a month of repeated attempts and have access to it only courtesy of a kind friend.)*

Policy RE1 is a hugely important policy which will change the county for ever. Inset maps of this chopped up, limited focus, type are appropriate for response purposes where the policy depicted on the maps is local in scale. This chopped about form of information is entirely unsuited to the depiction of a scattered but county wide policy. A transparent and meaningful consultation process would have set out clearly what and where LSAs are, complete with mapping of existing SSAs to give the whole picture. Some referencing system for the maps would also be required.

Instead we have a muddled and unhelpful set of map documents from which it’s hard to see what is proposed in terms of renewable generation, what is already in place is not shown, the maps are not easy to relate to AECOM maps or even to one another, and just to confuse things further the only document which contains a referencing system (Renewable Energy Topic Paper) refers to and names a different number of LSAs within the county, so adding significant further confusion rather than clarifying the situation.

It is also not reasonable to expect members of the public to make 25 separate responses to object to one

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policy, which ought instead to be depicted in a small set of coherent and informative maps.

We don't understand why AECOM maps, which are so much easier for people to use, which give a clearer idea of the whole picture and which can be expanded to give detailed locational information, have not been included in the LDP FFC documents, and believe they should have been included and would better inform not only the public but any policy decisions which might arise from policy RE1.

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

Please see response to FFC79.

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.

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ii) I want to speak at a hearing session.

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 .

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 10th October – Monday 21st November 2016**) will be forwarded to the appointed Inspector.