

Nant Mithil Energy Park Ltd is situated some 9 km east of the settlement of Llandrindod Wells. As a County Councillor for North Ward, Llandrindod Wells this is my considered **objection**.

Future Wales: The National Plan 2040 (2021) is the Welsh Government's National Development Framework and is the highest tier of the development plan in Wales. All developments of national significance must be determined in accordance with Future Wales, having primacy in the planning policy hierarchy.

It is accepted that development plans lie at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise, but it is essential that plans which are in place are kept up to date in order to deliver the vision, in this case for renewable energy generation. A plan that is out of date and undeliverable cannot be afforded the same weight in planning decision making. It cannot have primacy.

Future Wales, although only adopted in 2021 if, like other development plans it were to be reviewed every 5 years, would be due for renewal from 2026. But where a plan is clearly not delivering against its targets a review should be triggered earlier. In this case the sections of the plan which will be relied upon by the applicants are now so significantly out of date and undeliverable they render the plan unsound.

The Planning Statement accompanying this application summarises the key components of Future Wales well in so much as it relates to this development, stressing that the location of renewable energy is of such significance that national ambitions are unlikely to be achieved without a supportive framework of national planning policies which have a focus on **delivering** a de-carbonised and resilient Wales through the energy we **generate**.

The planning statement claims that this development is compatible with the **outcomes** set out and sought by Future Wales, suggesting it would contribute to Outcome 2 (creating vibrant rural places), Outcome 3 (sustainable growth) and the Outcome 11 (building a more resilient and equitable low carbon economy). The backdrop to this application is indeed rural, the landscape is acknowledged to be breathtaking, the proposals, however, dull this beauty and detract from the vibrancy of the community,

and diminish the vitality of the tourism sector poised precariously upon on Radnorshire's foundational economies. The development may bring immediate economic impact, in terms of itinerant construction jobs, but there is no evidence of sustainable jobs, skills development or legacy benefit for future generations. The development will export the energy generated, subject to network connection, with no realistic opportunity for local benefit to residents or indigenous businesses. Surely it is inequitable to generate the energy here and to export it whilst residents are unable to make additional demands for green electricity to power their houses and homes due the 11KV network being at capacity already. This isn't trickledown economics, this isn't investment designed to facilitate anyone in Powys, a quarter of the land mass of Wales, to transition to a low Carbon economy, this is about export plain and simple.

To be clear not only does this development not deliver the outcomes cited it does the exact opposite. The development stands in striking contrast to the good intent; it is bad delivery. As it stands the applicants have provided no evidence as to how Powys will be stronger and more resilient because of a large-scale energy export company building upon the Radnor Forest. It's rather like having a new motorway through Powys intended to help support community connectivity and cohesion, but there being no access ramps in the county.

Policies 17 and 18 of Future Wales set out requirements in respect of renewable energy and are central to the determination of this and other DNS applications. The Government's strong support for the principle of developing renewable projects of all sizes is clearly set out. The applicant understandably cites reference in the policy that decision-makers must give significant weight to Wales' commitment to deliver its target to **generate 70% of consumed electricity** by renewable means by 2030. Nevertheless, decision makers must also consider:

- A. whether the renewable electricity proposed will actually be generated before 2030 as stated, and
- B. whether it will have been transmitted to a point of consumption.

The proposal is to generate 198MW with the site connected to the national grid for export by stepping up from 33KV to 132 KV at an on-site transformer. Sister company Green Gen Cymru then proposes to export the electricity to South Wales and the rest of the network via the Towy Usk project. A separate DNS planning application is proposed for this project, but without it or a consented alternative there is not purpose served in generating power that cannot be consumed. Even if both consenting regimes are not to be aligned it is unacceptable in planning terms to permit projects to generate electricity

unless there is a realistic prospect of it being consumed. Policy 17 ONLY provides a positive policy context to support developments where BOTH generation and consumption are weighed in the balance.

The Planning Statement understandably refers to the presumption in favour of large-scale wind energy development in Pre-Assessed Areas for Wind Energy set out in Policy 17 on the basis that the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. This premise is fundamentally flawed and policy 17 cannot be relied on for two reasons. The first being that only part of the site falls within the Pre-Assessed Area, but more importantly because the work upon which the pre-assessed areas was based (undertaken by Arups) is outdated, based on modelling from 2017. It is not safe to say that the Radnor Forest can acceptably accommodate a large-scale energy development consisting of 220m high turbines in the same way that it may have been concluded it could accommodate 65m high turbines. The presumption is flawed and cannot be relied upon to weigh in favour of any and all large-scale energy developments. This flaw is not acknowledged by the applicants, but should be given weight by decision makers.

Policy 17 also highlights the promise made by the Welsh Government to work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure. In simpler language it requires that new strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities and promises the active involvement of the Government in ensuring the timely and efficient upgrades to both transmission lines and local distribution networks to **benefit local communities**. It is hugely frustrating that there is little or no evidence that the Government is working on behalf of local communities to ensure that people's homes and places of work will benefit from local network improvements to make the transition to a low carbon energy future. Indeed NESO, the National Energy System Operator, is only now launching its consultation on a whole system approach and is not due to report back until next summer, which further demonstrates the disconnect in not accepting a pause in applications requested by Powys Council and allowing all pipeline applications to be assessed together. The Cabinet Secretary's response to the Chair of Powys Council (2025) in respect of grid infrastructure, that "where an energy generating station is proposed it would be a commercial decision whether or not to implement any consent ahead of a grid connection being available to enable the generating station to become operational", is completely add odds with the intended strategic approach set out in Future Wales. This

clearly states that the pre-assessed areas would be used to inform strategic discussions around the grid to enable an integrated approach to energy planning to come forward. That it has not, and that we are now faced with numerous disassociated planning applications in the DNS pipeline, further undermines the credibility of Future Wales as a strategic planning approach to be relied upon.

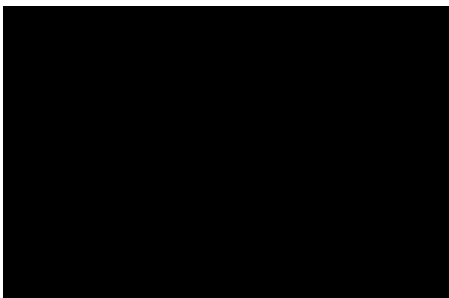
Since Future Wales was adopted, there is no evidence that new grid infrastructure has been planned and coordinated by the Government to support large scale energy projects in Mid-Wales to ensure that they also benefit from a fair and just, equitable transition to a low carbon future. This application is tied to a private project to simply export energy from Powys with the Government not actively facilitating its commitment. Consenting projects, such as this, is not the same as actively working towards a sustainable energy outcome that would deliver energy generated by renewable means actually being consumed before 2030. The Welsh Government published Energy Generation in Wales in 2023 setting out the energy generation capacity in Wales and analyses how it has changed over time. It states that renewable electricity capacity installed has been plateauing, only increasing by 11 per cent over the last five years. This decline in deployment is multi-faceted, but for Powys, which is a net energy exporter contributing 13% of renewable energy generated in Wales, the problem can be attributed to grid and network capacity problems. The recently approved Garn Fach energy park (2024), for instance has, I understand, presently has no access to a grid upgrade until 20250. That means no generation and no consumption. It does not deliver on the commitment. Consenting more capacity to generate is absolutely not the same as installed capacity supplying actual homes and business with power. Accelerating planning decisions for more wind farms will not, as suggested by the First Minister, grow the Welsh economy it will just stockpile more permissions, which is an illusion. Permissions by themselves do not contribute to the Welsh Government's renewable energy targets and as such deliverability must be given greater weight in the planning balance when chasing targets.

Given that I have shown that policy 17 does not apply to this development and cannot be relied upon to provide a presumption in favour, Policy 18 requires the applicant and decision maker to demonstrate that the proposal does not have an unacceptable adverse impact on the surrounding landscape. Much will be made by others about this landscape and its ability to accommodate a development of this magnitude without unacceptable harm, but I do counter the applicant's assumption that the landscape character of a flat-topped wide-open expanse can assimilate 30 turbines of up to 220m without unacceptable harm. This landscape, described overall as breathtaking consists of gentle, smooth rounded, undulating hills with steep sides that actually have very little

depth away from the visible ridges making it unsuitable to accommodate towers of this magnitude. This gentle, intimate landscape simply doesn't have the carrying capacity for towers of this height. A look across to the static Hendy turbines, half the size of those proposed makes the case readily. Residents from nearby properties and communities feel themselves to be adversely affected by both noise and visual disturbance which are overbearing for some in proximity and will make their cases by way of formal objection.

The proposal has the potential to generate 198MW of energy, enough to power the equivalent of between 130,000 and 193,000 homes, over twice as many households as we currently have in the whole of Powys. The Mid Wales Energy Strategy 2025 confirms that Powys is already a net exporter of renewable energy with falling consumption outpacing growing supply. The Region aims to achieve a net zero carbon energy system that delivers social and economic benefits by 2050. In delivering a just transition to decarbonised energy the intention is to support green job growth, affordable energy and increased community and public sector green assets. The Region's vision recognises the need to overcome grid constraints while making sure that the energy transition takes place alongside adaptation, particularly in relation to retrofitting our aged housing stock, and is compatible with the protection and restoration of natural habitats. The Energy Strategy, which must also be a material planning consideration, seeks a green energy future grown from the bottom up and serving communities first where the benefits are understood and shared.

In conclusion, the development fails when tested against the aspirations, intended outcomes and policies of Future Wales, which is itself dated and flawed and cannot be relied upon by decision makers. There is unacceptable harm to a sensitive landscape and no discernible sustainable energy benefit to local communities, or the residents in Llandrindod Wells who should not have to sit back and watch yet another redundant energy park get built and not generate any power or watch like bystanders as the power leave the county to be consumed elsewhere with no lasting economic legacy.



Councillor Jake Berriman