


From: [George, Russell \(Aelod Cynulliad | Assembly Member\)](#)
To: [Correspondence mail - 31](#)
Cc: 

Subject: Response to NDF Consultation - From Russell George AM
Date: 15 November 2019 17:07:08
Attachments: [image001.jpg](#)

Dear Julie

I would like to provide my view in regards to the NDF consultation.

My views below are aligned with the views of Powys County Council's Conservative group.

I have been copied into a number of consultation responses from my constituents. I have read the consultation response from Montgomeryshire Against Pylons (MAP) and the Countryside Protection for Rural Wales (CPRW) I also support the position of both organisations.

My views focus on the Energy section of the NDF Consultation.

I was disappointed by the lack of consideration for Grid Connection and how that will impact the landscape and the various industries in Powys. I feel that the planning policy guidance for decision makers should regard the landscape impact of grid connection as a material consideration. Applications which allow development to connect to existing DNO grid connections (and therefore would be more sympathetic to the landscape) should be given more favourable weight than applications which will require large scale pylons.

The GIS computer generated priority areas which take into account a number of variables in locating suitable renewable development, do not look at industry which could be impacted by the development of wind or solar farms. For example, tourism business and tourism related assets (e.g. national trails). This needs to be given consideration to and factored into planning guidance for decision makers. Further, in Policy 3, it is stated that it is important that the planning system responds to the challenges faced by the rural economy, "facilitating appropriate new development and diversification". Many agricultural businesses have diversified into tourism and this trend is likely to continue. This needs to be given due consideration and consideration given to how energy development will impact the sustainability of such rural areas.

When a DNS application is submitted it must allow for local community engagement / consultation, there must be a clear process and communities must be given ample notice of the application to assess wider implications and impact on the community. Community engagement and consultation should also extend to those communities along any transport routes which will be used during construction phases.

Priority areas have not taken into account National Trails / rights of way routes or any other known unsuitable areas i.e. large areas of peat which may be hugely important to the ecology of an area.

It is unclear whether any consideration has been given to the impact on road networks that link to priority areas. During construction phases of any development, roads will be used to transport large parts to the sites and will cause congestion. This impact needs to be identified and should be factored into planning guidance for decision makers, particularly the impact this could have on the various economic industries in Powys.

On page 56 of the Framework document, when referring to Mid and South West

Wales regions, Welsh Government states that “areas of environmental and landscape importance should inform strategic decisions on locations for growth and new infrastructure”. How then does this align with the statement under Policy 10 which states that “There is [a] ... acceptance of landscape change.”? Welsh Government needs to realise that “landscape importance” is essential to Mid Wales’ economy and sustainability, which as Welsh Government states under policy 3, draws visitors from “around the world”. This wholesale acceptance of “landscape change” is highly incompatible with the sustainability of these rural areas.

On page 37, there is a recognition that design must minimise the visual impact “particularly those in close proximity to built up areas”. I would argue that this point should equally apply to those developments in proximity to less built up areas.

Given the importance of the rural landscape to Mid Wales’ economy and sustainability, approval of large scale energy developments should be balanced with the demand for such energy from the surrounding areas to the development. Planning guidance should direct decision makers to give weight to supply and demand and balance this against the impact of such significant landscape change that large scale energy development would cause.

Kind Regards

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