

From: [Will Duff Gordon](#)
To: [NDE](#)
Subject: NDF Consultation Response
Date: 13 November 2019 18:38:13
Attachments: [Ireland Moor Objection to PCC LDP.pdf](#)

Dear Sir/Madam

Please find attached a response to the proposed National Development Framework.

Kind Regards

Will

Will Duff Gordon
Chair of Powys Moorland Partnership and largest shareholder in of Ireland Moor
Conservation Ltd



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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:	William Duff Gordon	
Tel:	[REDACTED]	
Fax:		
Email:	[REDACTED]	
Signature:	[REDACTED]	
Date:	21 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.*

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

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Section 2: Contact Details

	Your Details	Your Agent's Details (if applicable)
Name:	William Duff Gordon	
Organisation/Company:	Ireland Moor Conservation Ltd	
Address:	<div style="background-color: black; width: 150px; height: 40px;"></div> <div style="background-color: black; width: 100px; height: 20px;"></div>	
Postcode:		

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?

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 79

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

Section 3c: Your Comments and Suggested Changes

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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** ☒ support ☐ comment ☐ ? (Please tick)

Please use the space below to set out your representation:

I am the largest shareholder in the company I formed, with my brothers, to own and manage Ireland Moor (6845 acres) which is SSSI common land that stretches from Glascwm in the north to Aberedw in the South. I also manage another 2400 acres of moorland belong to my Father to the north of this. Much of this area of just under 10,000 acres is specified as being suitable for Wind and Solar systems and we are therefore important consultees as regards these proposals.

I did not buy the Ireland Moor with the plan to put up a wind or solar farm. It's not part of the strategic plan over the next 3-5 years that we have put in place in partnership with the Welsh Governments Sustainable Management scheme.

Whereas wind farms divide communities, reduce the recreational value of the land and provide little energy my vision is the exact opposite. We will be investing in improving the Natural Capital value of these moorlands (as land that stores carbon and stores/cleans water), collaborating with local communities and boosting local tourism through the establishment of SSSI land that is thriving in biodiversity. We employ 4 people full time to manage the moorland and bring people into the area for sporting recreation. This is long term rural job creation that fits into the existing rural life whereby it's a win win for the environment, the local economy and local communities.

I believe that my vision for the Powys uplands is more in line with the values promoted by the recent Future Well-Being of Generations Act (Wales) than is the creation of onshore wind or solar farms. The act calls for:

- Prosperous Wales
- Resilient Wales
- Healthier Wales
- More equal Wales
- Wales of cohesive communities
- Wales of vibrant culture & thriving language
- Globally responsible Wales

I would encourage the council to place its LDP plans up against these criteria to realise how many more of these items are achieve through long term and careful stewardship of the natural environment versus costly and intrusive wind or solar farms that divide communities, inefficiently produce energy and disrupt the landscape.

Powys can play its part in mitigating climate change through peatland restoration schemes such that we are doing and by offering unspoilt landscapes for people from the cities to escape to. If Powys Council presses ahead with its plans to cover large areas of its uplands in turbines people like us will be less motivated to manage the land to improve the carbon storage (wild fire risk will increase with massive carbon being lost to the atmosphere) and increase the biodiversity for which the land is of national importance (SSSI) while at the same time fewer tourists will come to

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the county. In other words, the suggested LDP is a lose, lose for the county and its environment.

I would also like to make the following, more structured points.

This is to register my very strong formal objections to the proposals being put forward by Powys County Council within the LDP under the nomenclature of "Further Focussed Changes: An Addendum to the Powys Local Development Plan Deposit Draft 2011-2016 (October 2016)"

In other words to expand the Local Search areas where applications for Windfarm and Solar Farm developments will be considered outside of the already enshrined Strategic Search Areas. These to be considered by Welsh Government rather than by Local Government with a presumed consent?

I wish to register my concerns and objections to the way and the methodology within which the process has been carried out, the timescales involved and the difficulties put in the way of those very committed and strong feeling individuals who wish to object and save Breconshire and Radnorshire from this potentially massive despoliation.

My objections should be considered as covering the following issues and concerns:-

1. Impact on the landscape, which of course is wider than just a visual one, though the despoliation of such a huge area, with added visual impact extending far beyond that area into England and other areas of Wales, these monstrosities can be seen for miles outside of their locations. Powys has a very wide and diverse landscape of natural beauty rich in history, archaeology and ancient sites of extreme and outstanding appeal which would be detrimentally impacted upon.
2. The wildlife, flora and fauna, studies have indicated that birds such as the falcons, Red Kite and Goshawks, Buzzards and other local and migratory birds and protected species are killed by these massive blades. Habitats would be emptied through disturbance. Bats are also proven to be killed in large numbers; it seems strange that a Planning Department which puts every obstacle in the way of ancient building restoration and development with particular concern for Bats should support the erection of Wind Turbines.
3. Impact on Businesses and the local economy this is far ranging and covers a multitude of facets from Farming, the historic legacy of upland and hill farming in Breconshire and Radnorshire dates back thousands of years, with historic hill rights for graziers, through to the Tourism Industry a huge part of the local economy by which the outstanding natural beauty and landscape is a significant driver and also encompasses the peripheral businesses that are dependent upon them brought about in the main because of the landscape, the topography, the beauty and accessibility, all of which would be extremely effected by the erection of turbines and panels.

Businesses such as :-

Horse riding, Pony trekking, Mountain Biking, Walkers, Hikers, Ramblers, Bird watchers, Paragliders, Microliters, Parascenders, Balloonists, Shooting and Shooting syndicates, Grouse moor investors, Farmers, Graziers, Welsh Mountain Pony owners, Pubs, Inns, Hotels, Holiday lets, Bed and Breakfasts, Caravan and camp sites Shops dependant on tourism and on the businesses that are reliant upon the land in question.

For very obvious reason all of the above would be extremely affected by the ability to use the hills and uplands as they do now.

Some points regarding on the above,

- Bryngwyn riding center would be negatively impacted with the erection of turbines

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and panels as horses and tourists/locals would not want to ride or see the landscape covered in industrial electricity pylons, turbines etc

- Fforest Fields Caravan and camping site near Builth Wells have just been awarded The Best camp site in Wales out of 862 entrants for the AA campsite of 2017, established for 26 years with the associated investment hard work and commitment to succeed, if the Aberedw Hill was to be covered with turbines and Solar panels what do you think would happen to that business and its dependants?
 - On Llandiello Hill is one of the few managed grouse moors in Mid Wales, , thousands of £'s, man hours and commitment has been invested over a large number of years to bring it into a viable business proposition
Shooting syndicates and businesses have also invested time and money into their chosen field not only for themselves but also as commercial enterprises bringing money into the Brecon and Radnor economy
All the above have Owners , employees, and associated dependants and dependencies who would be extremely effected by the proposals contained , many would not survive at all and have to close down , others would not enjoy the same returns for their hard work and investment .
4. Impact on the Health and wellbeing of the local and not so local population, research has proven that proximity to the turbine causes problems with health and wellbeing from not being able to sleep through to the constant noise effect and shadow flicker of the blades rotation on top of the visual upset experienced by those in sight of the turbines and panels. There are those more qualified to expand upon the multiple issues associated with this.
 5. Impact upon house values blighted of those local and those within sight of the turbines and panels, house values are blighted and diminish, potential sales reduce, especially once searches reveal that the potential for a Wind or Solar farm exists, studies have shown that 12% can be wiped off the value, thus effecting not only the economic wellbeing of families and home owners but their mental and personal health.
 6. The local infrastructure, which fits in and complements the landscape and adds to its attraction, is woefully inadequate for the huge type of developments proposed, new roads and bridges would have to be built despoiling the historic and natural landscape. The electricity infrastructure is again not fit for purpose and would require the installation of pylons or underground cable work in order to take the minimal power generated to the national grid "entry point" again totally changing the landscape and its undoubted attraction. The provision and development of this infrastructure would cause a significant carbon footprint impact on the area far in excess of that that the "sustainable provision of energy" would deliver
 7. I challenge the viabilities of wind turbines, it costs more, is heavily subsidised and is artificially inflating household energy bills as extra unit costs are passed on to the consumers because of this. Wind energy is one of the most inefficient sources of energy with very little evidence to show otherwise. Proposing to increase the target for wind generation from some 740 megawatt hours to something over 2.5 million hours seems wholly erroneous, targets driven by Europe, which by the way we are leaving! , and driven down by Welsh Government in their remote ivory towers totally disassociated from the area in question
 8. I would also remind the County Council that it is entrusted with the management and wellbeing of the County in a very real and also spiritual sense and that means the legacy left for our descendants in years to come, will Councillors become retro apologists for what their decisions regarding these proposals bring , will they eventually realise what they are doing to our beautiful hills and uplands, will they look out of their windows , if indeed they

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haven't moved away because of the eyesores that they have bequeathed and want to apologise for the legacy of their decisions in the same way as the Elan Valley water project was apologised for. Though it did create undoubted beauty it took away livelihoods and deprived us of that unspoilt countryside.

9. My concerns also should also reflect that I consider that Wind and solar Local search areas (LSAs) LDP Policy RE1 & associated maps(Further Focussed Changes)

- Undermines local democracy
- Is inconsistent with the Welsh Governments own published advice on the preparation of Local Development Plans
- Is inconsistent with national policy on renewable(on shore wind) energy
- Is inconsistent with recent Welsh Government Legislation
- Is in conflict with the objectives of the LDP and that
- Local impacts have not been considered
- Required environmental assessment procedures have not been properly carried out
- The policy is not adapted to nor reflects local need.

9. The policy is in conflict with TAN 8 of existing national policy.

10 I have read The briefing notes as prepared by the Campaign for the Preservation of Rural Wales CPRW (as no doubt have you) and wholly agree and support their stance on this and their objections so you should consider that I lend my name to their objections and also that Their objections should be considered as part of and in support of mine in all respects

11 For the sake of brevity I have not expanded on the detrimental impact that one could outline as part of the works that would happen as a result of the development on the landscape and the consequences of them on Tourism , the wellbeing issues from noise and visual impact The consequences for our wildlife, the loss of as yet undiscovered historical and archaeological sites, the safety aspect to our population and those that visit us, if they still want too that is and the undoubted effect on the environment, peatlands, water table etc.

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

They should be removed and proper consideration given to the needs and requirements of the people of Powys and its landscape and economy.

☐ 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.

x

ii) I want to speak at a hearing session.

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

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

English

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.