



Llywydd/President: Iolo Williams

Cadeirydd Dros Dro/Acting Chairperson: Peter Foulkes [peter.foulkes249@btinternet.com](mailto:peter.foulkes249@btinternet.com)

Gwefan/Websites: [www.cambrian-mountains.co.uk](http://www.cambrian-mountains.co.uk)

**The Objects of the Society, as registered with the Charities Commission.**

- 1. To promote, for the benefit of local communities, and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest and cultural heritage of the Cambrian Mountains.**
- 2. To advance the education of the public in the landscape, natural beauty, biodiversity,**

**19<sup>th</sup> October 2020.**

**To:** Mr Mike Hedges MS, Chair of The Climate Change, Environment and Rural Affairs Committee (CCERA) within Welsh Government.

**Copies to:** Committee members; Janet Finch Saunders MS, Llyr Gruffydd MS, Neil Hamilton MS, Jenny Rathbone MS, Joyce Watson MS, and the Clerk to the Committee – Marc Wyn Jones.

**Concerning scrutiny of the “National Development Framework” (NDF) or “Future Wales – The National Plan 2040”**

Dear Mr Hedges

The Trustees, on behalf of the membership of the Cambrian Mountains Society (CMS), make the following observations/recommendations as to the latest draft of the NDF.

The Society welcomes the proposal that ‘Mid Wales’ be a region in its own right, as recommended in the Society’s response to the first draft delivered to Welsh Government (WG) in October 2019. (Nevertheless, much of the Society’s original representation to the NDF still holds. We therefore attach this, alongside this letter, in today’s email.)

The Society is, however, not so encouraged by what little regard the proposed NDF still pays to the importance of the Nation’s Designated Landscapes - its National Parks (NPs) and Areas of Outstanding Natural Beauty (AONBs) – which collectively cover a significant section of the Welsh landscape. Any Spatial Plan is incomplete without taking into account those areas, which must be protected from inappropriate development.

The Cambrian Mountains, although not yet part of the Welsh family of Designated Landscapes, richly deserve to be so and must benefit from the same protection. The new Working Document provides good evidence for the case for either a Cambrian Mountains AONB or a Cambrian Mountains NP. The table below expands on how the biodiversity and ecosystem services set out in the “Map Showing National Natural Resources” on page 79 of the new Working Document support this case:

National Natural Resources (as mapped on p.79 of the working document)	Cambrian Mountains' contribution
<b>Biodiversity hotspot</b>	Within the Cambrian Mountains area can be found; <ul style="list-style-type: none"> <li>• around Abergwesyn - the founder population of Red Kites,</li> <li>• in the Twyi Forest - a healthy population of Red Squirrels (an endangered species),</li> <li>• and on Pumlumon - the most southerly population in the UK of the arctic/alpine tree 'Dwarf Willow' to name but a few.</li> </ul>
<b>"Carbon"</b>	The Mountains hold large expanses of carbon rich blanket bog, an important carbon sequestration resource.
<b>Ecosystem service hotspot</b>	The map suggests that an 'ecosystem hotspot' (No 5) is found in the Cambrian Mountains but in fact these hills, as a whole, provide a wealth of ecosystem services.
<b>Forestry</b>	The Mountains host large areas of woodland, including examples of the internationally rare ecosystem – 'Atlantic Oak Woodland' as found in for example the Elan valley.
<b>Upland habitat</b>	The Mountains are the second largest area shaded as such on the map, after Snowdonia.
<b>Natural Flood Management</b>	Not only the areas highlighted but further large expanses of these hills work as a massive sponge for rainwater.

Equally important in the case for designation is the quality of the overall landscape. NRW's own description of these hills (reproduced in the box below), taken from their 'visual and sensory' description of the Cambrian Mountains which accompanied the National Landscape Character Map of 2014, amply makes this clear:

*"This extensive, windswept, upland area is notable for its sense of vast emptiness, on either side of gentler landscapes. This is not a mountainous landscape of steep high peaks but more a smooth undulating plateau moulded by glaciation into huge sweeping landforms on a grand scale. Moorland dominates the plateau, interrupted by peaks and knobs including Plynlimon. It offers some of the longest views in Wales - endless vistas, often with small lakes in the foreground. Many areas are only accessible on foot or horseback and at the fringes of the plateau give way to dramatic cliffs, corries and scree slopes. Narrow valleys carve the plateau and its fringes, ranging from small ravines and gorges to U-shaped valleys. Valley sides are clothed in semi-natural woodland or conifer plantations with 'ffridd' pasture on shallower slopes and valley floors.*

*It is a simple landscape in which curved and sinuous forms predominate over straight or angular lines and where the perception of colour changes dramatically with the quality of light and through the seasons with heather and gorse adding colourful highlights to the hills. There are panoramic views from high summits over the moorlands and adjacent lowlands, and many low-angle views across summit ridges, where the topography of the intermediate valleys is hidden. The visual effect is one of vast, uninterrupted extents of rolling moorland. Topography moulds the reservoirs into twisting, linear forms. In some places, small fingers of water project from intermediate side valleys whilst steep hillside spurs fall down between them."*

This is even more pertinent today as tourism and recreation play an ever-increasing role in the economy of the Cambrian Mountains as well as its 'necklace' communities such as Rhaeadr, Llanwrtyd and Tregaron. The figures below, taken from a 2020 report for WG's 'Visit Wales'<sup>2</sup>, illustrate the importance of visitors to the economy of the Cambrian Mountains.

- In 2018 Nant yr Arian visitor & mountain biking centre, in the heart of the Cambrians, attracted 111,826 visitors, this comparing favourably with a similar centre, Coed y Brenin, in N. Wales with 137,714 visitors.
- In the same year the Elan Valley visitor Centre, near Rhaeadr attracted 202, 418 visitors.

In summary; WG's own NDF Working Document, WG's 'Visit Wales' Tourist Attraction Report and the National Character Landscape Map constitute clear and compelling evidence that WG should follow through the 1970s proposal and designate the Cambrian Mountains as part of the family of Wales' Protected Landscapes.

Both the Alliance for Welsh Designated Landscapes and the UK's Campaign for National Parks support CMS's campaign for Designated Landscape status for the Cambrian Mountains.

### **Policies 17 & 18 of the Draft Working Document – proposals for renewable and low carbon energy provision.**

CMS trustees are still concerned over the provision of "pre-assessed areas for wind energy" (previously "Energy Priority Areas/EPAs [for wind]"). We are relieved that, according to the Wind Energy and Heat Networks map on page 94 of the draft, no such areas have been allotted to the Cambrian Mountains. We trust this decision reflects WG's understanding of the wealth of Natural Capital these hills hold, and that large-scale wind farms would damage the valuable range of ecosystem services they provide, services that would be severely compromised by the intrusion of concrete, steel, access tracks and borrow pits.

Nevertheless, the wording in Policy 17 (page 95) of the draft the Working Document - "*a presumption in favour of large-scale wind energy developments in these areas*" – is unclear. '*Presumption*' does not mean that sites such as may be found in the Cambrian Mountains will not, in the life of the NDF, be considered suitable for wind farm development. Also, there is no definition of "large-scale", is the threshold 6, 26 or 56 turbines? Does the size of the individual turbines affect this threshold?

Further, policies 17 and 18 should expressly take into account the 'wind farm landscapes' created when multiple single turbines are granted individual permission within an area. The detrimental impact of a lack of coordinated planning policy in this respect is now very visible, for instance, across the hills to the west of Llanidloes, with what appear to be randomly sited turbines dotted across this rolling landscape. Assessing the cumulative impacts of both large-scale wind farms as well individual turbines must be built into the final policies.

**To summarise**, the emerging NDF represents a timely and appropriate context in which to bring the Cambrian Mountains into the Welsh family of Designated Landscapes. The benefits set out in the table and box of the previous page together with the absence in the current draft of "Pre-assessed areas for wind energy" within the Cambrian Mountains support such a conclusion. The evolution of the NDF into a true Spatial Plan must take as much account of the Nation's outstanding landscapes as it does of the built environment.

Yours



Mr. Peter Foulkes, on behalf of the Trustees of the Cambrian Mountains Society/CMS.

Swn yr Afon, Abercegir, Machynlleth, Powys, SY20 8NR. Tel: 01650 511821.

## References

1. <https://cdn.cyfoethnaturiol.cymru/media/682591/nlca21-cambrian-mountains-description.pdf?mode=pad&rnd=131550586240000000>
2. <https://gov.wales/sites/default/files/statistics-and-research/2020-01/visits-to-tourist-attractions-in-wales-2018.pdf>