

Representations Received to the Draft SPG: Wind and Solar Energy

Representation No. RE01 from Martina Dunne, Pembrokeshire Coast National Park Authority

Reference	Summary of Respondent's Response:	Officer Response:
RE01.01	The respondent seeks a reference to needing to consider impacts on the special qualities of neighbouring National Parks (Brecon Beacons and Pembrokeshire Coast) where landscapes are referred to in the document. Current references are to 'any locally designated or valued landscape'.	<p>Agreed, where reference is made to Section 5.5.2 Section A: Valued Landscapes and Cultural Heritage Assets – reword to read (new text underlined):</p> <p>“Detailed and specific analysis will be required, in order to fully appreciate the nature of the development, the site and its surroundings and the likely effects on any locally designated or valued landscapes, including their essential setting, where appropriate. <u>The impact on the special qualities of the two neighbouring National Parks, Brecon Beacons and Pembrokeshire Coast will be considered.</u>”</p>

Representation No. RE02 from Sharon Luke, Natural Resources Wales

Reference	Summary of Respondent's Response:	Officer Response:
RE02.01	The respondent welcomes the SPG and supporting Studies.	Comments noted.
RE02.02	<p>Paragraph 4.5.1 should now refer to the 2017 Regulations rather than 2010.</p> <p>This section could benefit from wider explanation, i.e. if there is an adverse effect, the proposal will need to be changed or it may be refused. The respondent advises that the implications, if it is deemed that there may be adverse effects on a European sites integrity, are made clear.</p>	<p>Agree in part, change reference in paragraph 4.5.1 and 4.5.2 to the Conservation of Habitats and Species Regulations 2017.</p> <p>In terms of the section benefitting from wider explanation, the process isn't as simple as just refusing if adverse effects are identified and cannot be mitigated. A project can proceed if it meets several tests in the legislation including there are no alternatives, they meet imperative reasons of overriding public interest and compensatory measures are provided. Add the following to the end of paragraph 4.5.1:</p> <p>Where adverse effects on site integrity are identified and cannot be mitigated, any proposal will be refused unless it can be demonstrated that there are no alternatives, the scheme is required for imperative reasons of overriding public interest and compensatory measures can be provided.</p>

Reference	Summary of Respondent's Response:	Officer Response:
RE02.03	Paragraph 4.5.2 should include that Appropriate Assessments should be assessed in view of the Natura 2000 site's conservation objectives.	Agree, add the following to the end of paragraph 4.5.2: Appropriate Assessments should be assessed in view of the Natura 2000 site's conservation objectives.
RE02.04	Section 4.10, Ecological Considerations: Renewable energy schemes, like any development, should be carefully sited to avoid and minimise ecological impacts. This means not just on designated sites, but also to minimise effects on notified features of designated sites which are mobile species at risk from the type of renewable energy development concerned (e.g. turbines near bird sites or designated bat roosts). Consideration is also required for other potential impacts outside the protected sites for example if a proposal is hydrologically linked or near a site (e.g. solar panels near a Special Protection Area where the bird features may mistake the panels for water).	Agree, add the following text to paragraph 4.10.1: Renewable Energy schemes must avoid and minimise ecological impacts, this includes considering off site impacts including those associated with grid connection, hydrological connectivity and highway access and consideration of mobile species (such as birds and bats).
RE02.05	Paragraph 4.10.4 - Depending on the ecological interest, a specialist survey may be required in certain cases.	Agree. Paragraph 4.10.4 to be amended to read: Where habitats and species are noted of high ecological interest, specialist surveys may be required in certain cases.
RE02.06	Consideration should be given to habitat and ecological connectivity so that sites and species do not become isolated. We should now be looking at landscape scale habitats with connectivity for sustainability.	Agree. Add the following text to paragraph 4.10.4: Consideration should be given to habitat and ecological connectivity to prevent the isolation of sites and species and ecosystem resilience.
RE02.07	4.10.8 Ecological surveys – the respondent agrees with the statement 'It is preferable that planning permissions will not be conditioned depending upon survey results'. There is clear case law to support that surveys should inform the determination of planning applications, and that surveys should not be conditioned.	Noted, although a change is suggested to remove "it is preferable that", as case law is very clear, ecological considerations are a material consideration and all ecological survey work must be presented to inform an application.
RE02.08	Paragraph 4.11.4 - Proposals for ecological compensation: It would only be applicable for NRW to be involved in consultation/discussions if designated	Add text to paragraph 4.11.4 so that it reads as follows (additional text is underlined):

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	sites, European Protected Species or Wildlife and Countryside Act species are implicated. LPA Ecologist should otherwise lead on discussions and negotiation.	If a compensation approach will be likely utilised for a development, early discussion is encouraged with the LPA ecologist and if applicable, Natural Resources Wales (<u>if designated sites, European Protected Species or Wildlife and Countryside Act species are implicated, NRW should be involved in the consultation and/or discussion</u>).
RE02.09	Paragraph 4.11.5 - Circumstances may arise where refusal may be the only option if the damage is unavoidable or where it may only proceed if there is an overriding public interest.	Agree. Add the following to the end of the paragraph: Compensation in relation to Natura 2000 features will only be considered if there are no alternatives to the proposed scheme and the scheme meets the requirement of being of imperative overriding public interest.
RE02.10	Paragraph 5.2.3 - This should state 25MW not 5MW.	Disagree. Paragraph 2.13 of TAN 8 states that “...Assembly Government would support local planning authorities in introducing local policies in their development plans that restrict almost all wind energy developments, larger than 5MW, to within SSAs and urban/industrial brownfield sites. It is acceptable in such circumstances that planning permission for developments over 5MW outside SSAs and urban/industrial brownfield sites may be refused.”
RE02.11	Section 5.5 Landscape and Visual Impacts - A. Factors relating to site content - Valued Landscape and Cultural Heritage Assets: The respondent recommends this includes reference to landscapes included in the register of Landscapes of Historic Interest in Wales. B Factors relating to siting - Settlements and Urban Landscapes: Whilst the respondent understands the views about siting near to buildings or structures, there could also be conflicts with other advice on visual amenity in relation to buildings and settlements.	A. Agree, add reference to landscapes included in the register of Landscapes of Historic Interest in Wales in section 5.5. B. Comments noted, no change required.
RE02.12	The respondent notes that ecological considerations may be a factor relating to the siting of turbines. Woodland edge, trees and hedgerows may attract foraging	Disagree, these are ecological considerations. Para 3.4.3 deals with all the other adopted planning policies which must be taken into

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	and commuting bats; locating small scale turbines close to them may be problematic. The respondent advises that the document includes reference to the Natural England guidance technical information note (TIN) 051: Bats and Onshore Wind Turbines Interim Guidance (March 2014) which includes guidance on siting turbines in relation to areas used by bats.	account when reaching a planning decision – including EQ4: Biodiversity.
RE02.13	Paragraph 5.6.2 – the respondent recommends removing the statement that the assessment of impact on visual amenity can be a subjective one. There is a recognised technical methodology for assessing visual impact, Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3, as referenced in section 5.6.3.	Agree, delete paragraph 5.6.2.
RE02.14	Paragraph 5.6.3 – the respondent notes and supports the statement that applications shall be accompanied by an appropriate LVIA.	Noted.
RE02.15	Paragraph 5.11.2 - Bats – the respondent advises that all planning applications not only require a bat survey, but where bats may be impacted by the proposals, detailed proposals of all the mitigation and post-construction monitoring that will be put in place.	Agree. Insert a new paragraph: 5.11.3a Where bats may be impacted by the proposals, detailed proposals of all the mitigation and post-construction monitoring that will be put in place will be required.
RE02.16	<p>Paragraph 5.11.3 - Bat assessments - Whilst the respondent notes the reference to the 2nd Edition of the Bat Conservation Trust Survey Guidelines in respect of wind developments, guidance in 3rd Edition (2016) may also be relevant for undertaking bat activity transects, emergence/re-entry surveys, and roost assessments.</p> <p>As indicated above, the respondent would not advocate an approach to permitting the construction of a turbine by curtailing its operation until surveys can be completed. This could leave the developer with a permission that they cannot then fully implement.</p>	<p>Add the following to paragraph 5.11.3: Guidance contained in 3rd Edition (2016) may also be relevant for undertaking bat activity transects, emergence/re-entry surveys, and roost assessments.</p> <p>We do not advocate this curtailment approach until at least some survey work has been undertaken which appears to confirm bat risk is low. It does not leave the applicant with a consent they cannot implement only a turbine that is up and operational and can be curtailed in the bat season if necessary. The Council's</p>

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	<p>Reference to manual and static surveys should include surveys at the turbine location and nearby habitat boundaries (e.g. hedgerows, trees, woodlands).</p>	<p>ecologist is satisfied with this approach, which is also detailed in our Nature Conservation SPG.</p> <p>Add the following text (underlined) to the third bullet point under Bat Assessments:</p> <ul style="list-style-type: none"> Both manual (transects) and static surveys are required. Static surveys should be for 5 consecutive day's duration <u>and should be at the turbine location and nearby habitat boundaries, for example, hedgerows, trees, woodlands.</u>
RE02.17	<p>Paragraph 5.11.4 - Birds – the respondent recommends that a data search is also carried out via the local records centre and/or the local bird recorder or bird group is contacted. At times due to data restrictions (Schedule 1 birds, egg collecting etc) it is not that obvious on the desk study where vulnerable bird species are located and therefore contacting the local bird recorder could be helpful.</p>	<p>Agree, add the following to the second sentence in paragraph 5.11.4:</p> <p>The Study should include a data search via the local records centre and/or the local bird recorder or bird group. At times, due to data restrictions, it is not that obvious on the desk study where vulnerable bird species are located and therefore contacting the local bird recorder could be helpful.</p>
RE02.18	<p>Section 5.12 - Historic Environment and Archaeological Settings – the respondent recommends that reference is made to the need for an ASIDOHL2 assessment for EIA development for Registered historic landscapes.</p>	<p>Agreed. Add the following sentence to the end of paragraph 5.12.3:</p> <p>There may be a need for an Assessment of the Significance of Development on Historic Landscape (ASIDOHL2) for EIA developments for Registered historic landscapes.</p>
RE02.19	<p>Paragraph 6.4.2 - Visual impact and design – It should be clarified if this is only referring to the design of the building or more general e.g. views from the street scene, specific viewpoint, views from the surrounding urban area/landscape. There are situations where roof mounted panels can have adverse visual impact and be out of character with the locality.</p>	<p>The intention of the paragraph is to cover both individual buildings and the general street scene. It is proposed to amend the first paragraph to read (with the underlined text being added):</p> <p>The panels should be well incorporated and blend into the overall design <u>of the individual building and general street scene.</u></p>
RE02.20	<p>Paragraph 6.4.2 - Landscape considerations - This could also include hedgerows and be re-titled 'trees and hedgerows'. The respondent recommends that this is clarified to indicate that trees and hedgerows should not be removed to accommodate roof mounted panels/roof</p>	<p>Agreed. Title to be changed to "Trees and Hedgerows".</p> <p>Add the following sentence to the paragraph:</p> <p>Trees and hedgerows should not be removed to accommodate roof mounted panels and</p>

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	mounted panels should be sited away from existing trees and hedges which may cause shading.	should be sited away from existing trees and hedges which may cause shading.
RE02.21	Paragraph 6.7.1 – A. Factors relating to design – the respondent questions the use of statements such as “The most appropriate sites for ground mounted solar arrays are those which are south facing and are on flat areas or on lower slopes of lowland landscapes”. This is simplistic and only relates to one of the criteria (landform). We recommend referring to the range of criteria used to assess sensitivity and perhaps summarising the findings of the mapping for wind and solar, with reference to the figures in the relevant studies. Some flat or lower lowland slopes may be surrounded by adjacent high ground, overlooked and arrays may have a high visual impact.	<p>Agree in part, amend paragraph 6.7.1 as below to address this comment:</p> <p>“The most appropriate sites for ground mounted solar arrays are <u>likely</u> to be those which are south facing and are on flat areas or on lower slopes of lowland landscapes”</p> <p>These are site specific issues and better addressed during the planning application process.</p>
RE02.22	Paragraph 6.7.2 – B. Factors relating to site content - Valued Landscapes and Cultural Heritage Assets – the respondent recommends the addition of a reference to landscapes included in the Register of Landscapes of Historic Interest in Wales.	Agree, reference to landscapes included in the Register of Landscapes of Historic Interest in Wales to be made the end of the section on Valued Landscape and Cultural Heritage Assets.
RE02.23	Paragraph 6.7.2 – C. Factors relating to siting - Settlements and urban landscapes – the respondent is uncomfortable with the statement that “In sparsely settled rural landscapes, solar PV development should be located near to existing buildings or structures.” This is not necessarily the case and depends upon the character of the buildings and their settings. It would not be desirable in remote agricultural settings with historic farmsteads for example.	Disagree, this is a matter for consideration in respect of each individual planning application. If, for example, a field scale solar PV array were being considered in the context of a Listed Building, then we would anticipate that this would be fully taken into account at the detailed stage. It would be unwise to pre-judge this matter and apply an unwarranted restriction in all cases.
RE02.24	Paragraph 6.8.2 – the respondent recommends omitting the statement that the assessment of impact on visual amenity can be a subjective one. Please refer to our comments on section 5.6.2 above.	Agree. Delete paragraph 6.8.2

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RE02.25	<p>Paragraph 6.12.1 – the respondent notes the recommendation that applicants avoid habitat land and that the most suitable land for solar panels is intensively managed agricultural land. In identifying suitable sites for renewable energy developments, proposals should also seek to avoid significant impacts on protected species.</p> <p>The respondent also wants us to be aware that even intensively farmed land can and will be used for certain species, particularly if it is located near other habitat such as a river, lake or wetland e.g. many of the improved grassland farmland fields near the Afon Tywi are used by Bewick and Whooper Swans and Greylag or White fronted geese over the winter period.</p>	<p>Add the following to the end of paragraph 6.12.1:</p> <p>Proposals should not be located on sites which would create significant impacts on protected species.</p>
RE02.26	<p>Paragraph 6.13.1 – the respondent recommends including reference to the need for an ASIDOHL2 assessment for Environmental Impact Assessment (EIA) development for Registered historic landscapes.</p>	<p>Add the following to the end of paragraph 6.13.2:</p> <p>There may be a need for an Assessment of the Significance of Development on Historic Landscape (ASIDOHL2) for EIA developments for Registered historic landscapes.</p>
RE02.27	<p>Application Checklist - Applications should not only include surveys, but full details of proposed mitigation for any designated sites, European Protected Species or Wildlife and Countryside Act species that may be impacted, together with proposals for post-construction monitoring.</p>	<p>Agree, add the following to the checklist, under surveys for Solar and Wind Turbine Developments:</p> <ul style="list-style-type: none"> ✓ Details of proposed mitigation for any designated sites, European Protected Species or Wildlife and Countryside Act species that may be impacted, together with proposals for post-construction monitoring.
Carmarthenshire Wind Turbine Development Landscape Sensitivity and Capacity Study		
RE02.28	<p>Table 1 Typologies</p> <p>We note that it is stated that 'any group of 6 or more turbines will belong in the 'very large' typology irrespective of turbine height. We are of the view that 6 micro or small turbines (less than 25/50m) would not belong in the 'very large' category, however it is unlikely that this size of turbine would occur in groups of 6 or more, except cumulatively. There remains a considerable difference in scale</p>	<p>Disagree, the methodology for the Landscape Sensitivity and Capacity Study is to be in accordance with the widely used Heads of the Valleys Study as it was consistent with current best practice and allowing for ease of cross reference with other studies in Local Authority areas across South Wales.</p> <p>Furthermore, this change to the methodology would require a complete revision of the whole study.</p>

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	<p>between 6 medium turbines up to 80m and 6 turbines of over 109m, potentially up to 145m, as at Brechfa. We understand that this statement has come from the Heads of the Valleys study, however, we consider that a typology based on height, with a range of scales and an indication that increasing numbers may push the scale into the next size category, would better capture the difference in scales.</p>	
RE02.29	<p>The respondent notes that the LANDMAP Cultural aspect area layer has not been used due to the insufficient level of detail. Please note that the LANDMAP Cultural layer is being updated (from 2019) and may provide more detailed information in future.</p>	<p>Comments noted, however, the consultants opinion, is that such an approach will not change any of the assessments made in the study; Cultural Landscape Aspect Areas tend to cover very large geographical areas; e.g. a <i>single Aspect Area</i> - CRMRTCL061 (Rural Carmarthenshire) - extends across much of the study area; therefore the Cultural Landscape Aspect data has limited value in being used to highlight differences between the 80 areas identified by the study to assess capacity and sensitivity.</p>
RE02.30	<p>Table 4 Historic Value - Please note that Registered Parks and Gardens are now a statutory designation under Welsh Government historic environment legislation (also relevant to section 3.6).</p>	<p>The consultants understand that the change has occurred as a consequence of the Historic Environment (Wales) Act 2016 coming into force, resulting in a now statutory register for historic parks and gardens</p> <p>Their review of the Cadw website revealed the following text: <i>'The Welsh Ministers will have to compile and maintain a comprehensive register of parks and gardens of historic interest in Wales. It will help owners, local planning authorities and others to look after the sites in an informed way. Provision still to be commenced.'</i></p> <p>Reference is also needed to TAN 24, May 2017: <i>The Historic Environment</i> with regard to registered historic landscapes. The consultants are unsure of the current status of the compilation of the new statutory register and its implications for planning policy and development management, and suggest contacting Cadw.</p>
Carmarthenshire Solar PV Development Landscape Sensitivity and Capacity Study		
RE02.31	<p>The respondent notes that LANDMAP Visual and Sensory aspect areas have effectively been used as a basis for the</p>	<p>Comments noted.</p>

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	landscape units in the absence of county-wide landscape character areas. We note that the methodology generally follows that of the Heads of the Valleys Wind Turbine Development Landscape Sensitivity and Capacity Study and is informed by SNH guidance, GLVIA3 and LANDMAP Guidance Note 3.	
RE02.32	The respondent notes that the LANDMAP Cultural aspect area layer has not been used due to the insufficient level of detail. Please note that the LANDMAP Cultural layer is being updated (from 2019) and may provide more detailed information in future.	Refer to the response to RE02.29 above.

Representation No. RE03 from Caroline Hill

Reference	Summary of Respondent's Response:	Officer Response:
RE03.01	<p>The respondent seeks one additional safeguard in response to a recent case heard in the High Court, where the claimant was taking action in support of a Carmarthenshire County Council refusal of a wind farm scheme. The wind farm developer had deliberately gained permission for a smaller scheme and then quickly used a Variation in Condition application to significantly increase the size of the scheme. The Council's refusal was successfully appealed by the developer, because it was only the difference in the size of the consented scheme and the proposed scheme which was considered – NOT the overall impact. The respondent believes that this made a mockery of the Council's refusal and its policies and that this incremental approach to circumventing size limits is now being widely recommended as a tactic to developers.</p> <p>The respondent is suggesting that the SPG should make it clear that developers should not expect to be able to incrementally increase the size of their</p>	<p>The remit of SPGs, as set out in Planning Policy Wales, Edition 9, is that they are a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances.</p> <p>The respondent's requests exceeds the purpose of SPGs and requires a change in the procedures of planning applications, which would have to be enacted at a national level.</p>

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	<p>development by use of a quick succession of Variation in Condition applications.</p> <p>The respondent believes that it should be possible to state in the SPG that following consent for an application, there should be a considerable period of time before any Variation would be considered that increases the size of the major constituent parts of the development.</p>	
RE03.02	<p>The respondent seeks an additional paragraph to section 4.3. Pre-application consultation, which Ceredigion County Council have in their Renewable Energy SPG:</p> <p>4.3.2 A meaningful assessment of alternative means of producing renewable energy on the proposed site should be provided.</p>	<p>Agree in part. Insert a new section in 4.12:</p> <p>4.12 Choice of Site and Technology</p> <p>4.12.1 Applicants will be expected to justify the choice of site and the choice of renewable energy generation. The applicant will be required to demonstrate that the chosen technology is the most appropriate for the site. Different renewable energy technologies have different impacts, therefore applicants will be required to demonstrate that they are progressing with the technology that is the most efficient with the least impacts on the site.</p>
RE03.03	<p>The respondent seeks an additional paragraph to section 4.3. Pre-application consultation:</p> <p>4.3.3 It should also be shown why the chosen site is the most appropriate option.</p>	<p>See response above to RE03.02.</p>
RE03.04	<p>The respondent seeks an amendment to paragraph 4.6.1, so that it reads as follows, as set out in paragraph 12.10.1 of Planning Policy Wales, (the additional text being requested is underlined, and deleted text is marked as strikethrough):</p> <p>4.6.1 Some small-scale installations may not require new overhead connections to the electricity grid network and in the majority of cases, connection to the grid will not be a planning consideration. <u>However, the grid connection is an intrinsic part of the development and should be considered alongside the turbine(s) in accordance with PPW which states that grid connection issues should</u></p>	<p>Disagree. A full connection proposal can't be assessed as part of the planning application as there is a separate consenting process for such applications. However, it is suggested to re-word paragraph 4.6 as follows: (with the underlined text being added):</p> <p>4.6.1 Some small-scale installations may not require new overhead connections to the electricity grid network, <u>and in the majority of cases, connection to the grid will not be a planning consideration. However, where an application will be connecting to the grid, details should include consideration of the location and alignment of a connection.</u></p>

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	<p><u>be taken into account when determining a renewable energy development.</u></p>	
RE03.05	<p>The respondent seeks the insertion of the following additional text to paragraph 4.6.2, in accordance with the Carmarthenshire LDP:</p> <p>Ancillary structures should be carefully and sensitively sited and designed, and limited to locations where proposals would not have a significant cumulative effect. They should be sympathetic to the characteristics of the local landform, contours and existing landscape features.</p>	<p>Disagree. It is considered that the advice given in 4.6.2, along with newly published advice in PPW Edition 10, is sufficient to guide grid connection works.</p> <p>It is not clear what the respondent considers to be "ancillary structures". If this relates to substations and cabinets, then this is covered in more detail in Section 5.5. A new grid connection cannot be seen as an ancillary structure. This section deals with grid connection issues only.</p>
RE03.06	<p>The respondent seeks an additional paragraph to section 4.6. Grid Connection, as cited in a Report to the Welsh Government July 2010:</p> <p>4.6.3 The route of the grid connection (whether above or below ground) should be shown in the application. Ecological, landscape and visual impacts can be caused by ancillary infrastructure, and this includes grid connections.</p>	<p>Disagree. It is considered that the advice given in 4.6.1 & 4.6.2 is sufficient to guide grid connection works. It is not known what report the respondent is referring to.</p>
RE03.07	<p>The respondent seeks an amendment to paragraph 4.7.2 so that it reads as follows (the additional text being requested is underlined and deleted text is marked as strikethrough):</p> <p>4.7.2 For the purposes of this guidance, Community Energy can be defined as an energy scheme which is led by, or meets the needs of <u>residents within</u> the local community. <u>The community is defined as the residents within the area immediately adjacent to the proposed site, and those potentially adversely impacted by it.</u> The community must have ownership of the development, either in full or shared <u>majority part</u>, whilst maintaining full control over it. As a result of a number of positive case studies and the local benefits involved in such schemes, community energy projects will be given support and encouragement by the Council.</p>	<p>Disagree. There is no need for the SPG to provide a definition of community, which would potentially limit the implementation of the guidance.</p> <p>Guidance provided by the Welsh Government in terms of the ownership of community schemes does not specify that they should be owned as a majority part. The guidance in PPW (Edition 10) supports "projects which are developed by communities or benefit the host community or Wales as a whole" (para. 4.145). PPW continues: "The Welsh Government supports the principle of commercial developers working together with community based organisations to take forward projects on a shared ownership basis"(paragraph 4.147).</p>

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RE03.08	<p>The respondent seeks an amendment to paragraph 4.7.3 so that it reads as follows (the additional text being requested is underlined):</p> <p>4.7.3 ... Shared ownership could involve a <u>guaranteed</u> share in the overall generated income from a scheme or part or full ownership of the scheme...</p>	Disagree, see above response RE03.07.
RE03.09	<p>The respondent seeks an additional paragraph to section 4.7. Community Energy:</p> <p>4.7.5 As a matter of course, the public should be advised that the Local Authority does not scrutinise the financial data or the scheme's predicted productivity or income, and such schemes usually carry financial risks and are not financially regulated.</p>	Disagree. This is not a planning matter.
RE03.10	<p>The respondent seeks an additional paragraph to section 4.8. Community Benefits:</p> <p>4.8.3 Financial contributions by developers may be secured by planning condition or Section 106 agreements where they relate to the size of the development and offer material and mitigating benefits in the impacted locality e.g. through highway or wildlife habitat improvements.</p>	Disagree. Paragraph 4.8.1 covers what can be sought by contributions, as set out in Planning Policy Wales Edition 10 (paragraph 3.5.5).
RE03.11	<p>The respondent seeks an additional paragraph to section 4.8. Community Benefits:</p> <p>4.8.4 Community benefit funds offered by developers, usually on an annual basis and per megawatt of installed capacity, are voluntary and cannot be enforced.</p>	<p>Agree. Add a new paragraph as follows:</p> <p>4.8.3 Community benefit funds offered by developers, usually on an annual basis and per megawatt of installed capacity, are voluntary and cannot be enforced.</p>
RE03.12	The respondent seeks an additional paragraph to section 4.8. Community Benefits:	<p>Agree, add the text to the end of paragraph 4.8.3, as follows:</p> <p>"... Therefore, such voluntary contributions do not enable permission to be granted for a</p>

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	<p>4.8.5 Therefore, such voluntary contributions do not enable permission to be granted for a proposal that would otherwise be unacceptable in planning terms. The absence or presence of voluntary financial contributions is not an issue which will be considered, or given weight to, in the determination of the planning application.</p>	<p>proposal that would otherwise be unacceptable in planning terms. The absence, or presence of voluntary financial contributions is not an issue which will be considered, or given weight to, in the determination of the planning application."</p>
RE03.13	<p>The respondent seeks an amendment to paragraph 4.10 so that it reads as follows (the additional text being requested is underlined):</p> <p>4.10 Ecological Considerations:</p> <ul style="list-style-type: none"> Renewable Energy schemes should not be located on ecologically important sites (including Sites of Special Scientific Interest, Ramsar Sites, Special Protection Areas and Special Areas of Conservation). <u>It should be recognised that developments some distance away from designated sites can impact upon them due to watercourse connectivity, habitat connectivity for mobile species and environmental sustainability.</u> 	<p>Agree in part. See comment RE02.04.</p>
RE03.14	<p>The respondent seeks an amendment to paragraph 4.10.3 so that it reads as follows (the additional text being requested is underlined):</p> <p>4.10.3 A Preliminary Ecological Appraisal.... determining protected species interest. <u>Species/habitat surveys should cover the delivery route(s) and the site, including not only the turbine position(s) but also all ancillary development, access tracks, construction compounds, drainage measures, and areas impacted by road widening or overrun. Additionally, cumulative impacts with other developments in the area should be assessed.</u></p>	<p>Agree, add the following to the end of paragraph 4.10.3:</p> <p>Species/habitat surveys should cover the delivery route(s) and the site, including not only the turbine position(s) but also all ancillary development, access tracks, construction compounds, drainage measures, and areas impacted by road widening or overrun. Additionally, cumulative impacts with other developments in the area should be assessed.</p>

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RE03.15	<p>The respondent seeks an amendment to paragraph 4.10.2 so that it reads as follows (the additional text being requested is underlined):</p> <p>4.11.2 Any mitigation measures proposed should reflect recent survey work and demonstrate a clear understanding of the site, <u>and access route(s) and their</u> ecological considerations.</p>	<p>Agree, amend paragraph 4.10.2 so that it reads as follows:</p> <p>4.11.2 Any mitigation measures proposed should reflect recent survey work and demonstrate a clear understanding of the site, and access route(s) and their ecological considerations.</p>
RE03.16	<p>The respondent seeks an additional paragraph to section 5.3 Wind Turbine Development outside Strategic Search Areas:</p> <p>5.3.2 Very large turbines (>109m) are unsuitable outside SSAs.</p>	<p>Disagree. This is not in line with current advice from the Welsh Government. Paragraph 5.2.3 sets out current advice from the WG as to the size of the turbines permitted outside SSAs.</p>
RE03.17	<p>The respondent seeks an additional paragraph to section 5.3 Wind Turbine Development outside Strategic Search Areas (the respondent cites TAN 8, paragraph 2.13, Heads of the Valleys guidance, Landscape Capacity and Sensitivity Study):</p> <p>5.3.3 Most areas outside SSAs should remain free of large wind power schemes. The large typology is defined as a turbine greater than 80m to tip height, or any group of more than four turbines no matter how small. Schemes outside the SSAs should have suitable separation distances between them. Wind turbines should not be spread across the whole county.</p>	<p>Agree in part.</p> <p>A new section has been added to section 5.1.2 setting out the turbine typology taken from the Wind Turbine Development Landscape Sensitivity and Capacity Study.</p> <p>A new paragraph has been added – 5.3.2 stating that areas outside SSAs should remain free of large wind power schemes (Large scale schemes being defined as being over 25MW), in line with guidance set out in TAN 8 paras 2.2 & 2.13.</p> <p>The Carmarthenshire Wind Turbine Development Landscape Sensitivity and Capacity Study provides a landscape character assessment for different areas of the County, and sets out what type of turbine development would be appropriate in these areas. It is considered that this approach meets the requirements of paragraph 2.13 of TAN 8 which seeks a balance which will not result in a severe restriction of wind turbine development.</p>
RE03.18	<p>The respondent seeks an additional paragraph to section 5.3 Wind Turbine Development outside Strategic Search Areas:</p>	<p>Disagree. Advice on the types of development requiring an EIA screening opinion is contained in section 4.4.</p>

Reference	Summary of Respondent's Response:	Officer Response:
	5.3.4 Little can be done to mitigate the impact of larger turbines. It is likely, therefore, that even a single turbine will require an EIA screening assessment.	
RE03.19	<p>The respondent seeks an additional paragraph to section 5.3 Wind Turbine Development outside Strategic Search Areas:</p> <p>5.3.5 In judging the need for an EIA, the application should be considered in combination with other developments to determine the potential cumulative effects.</p>	Disagree. Advice on the types of development requiring an EIA screening opinion is contained in section 4.4.
RE03.20	<p>The respondent seeks an additional paragraph to section 5.3 Wind Turbine Development outside Strategic Search Areas:</p> <p>5.3.6 If an EIA is required, it should include ancillary development and associated infrastructure including substations, grid connections and access routes.</p>	Disagree. Advice on the types of development requiring an EIA screening opinion is contained in section 4.4.
RE03.21	Paragraph 5.4.1 – the respondent notes that this section rightly describes wind turbines as large man-made elements. But they are not only “substantial vertical structures; the “moving blades” draw the eye and move over a large area. The scale of the visual impact is increased not only as the height increases, but as the rotor size increases. This is especially relevant to acknowledge in the SPG now that developers are increasingly choosing to deploy turbines with “oversized” rotors. The respondent believes that this needs to be explicitly stated in the SPG, particularly in light of recent protestations by one wind developer that the circle described by turbine blades is somehow of no visual consequence.	Disagree. The consultants who prepared the Study comment that the validity of this comment is limited and does not demonstrate that the author fully understands the difference between size and speed of rotor and its capacity to draw the eye when moving. Although smaller turbine rotors have a smaller blade-swept area, they turn more rapidly when compared to large rotors. When both types are seen together, the smaller turbine rotor movement is more visually arresting. Such factors are a matter for consideration at the level of the individual planning application and are too detailed for incorporation into this SPG.
RE03.22	The respondent comments about paragraph 5.5.2 – Section B - Focal Features/Settlements and Urban	The consultants comment as follows: SNH guidance on small turbines states that “ <i>It is important for small scale turbines to relate well</i>

Reference	Summary of Respondent's Response:	Officer Response:
	<p>Landscapes - The phrases "a turbine sited next to an isolated farm could draw attention to its presence" and "In sparsely settled rural landscapes, turbines should be located near to existing buildings" seem to contradict one another. Policy hitherto has suggested that, where a development is associated with farm diversification, it should be positioned close to the farmstead. The respondent believes that the phrase which does make sense is "Turbines should be located in the least visually prominent location." This is consistent with, for example, avoiding skylines.</p>	<p><i>to and compliment the scale of nearby buildings</i>" [Siting and designing wind farms in the landscape, SNH, August 2017, Annex 1, p. 44]</p> <p>The consultants do not consider these statements to be contradictory as they describe deferent scenarios, and consider that the following text can be added by way of clarification:</p> <p><i>'Turbines should be sited in the most appropriate location when viewed from a variety of viewpoints whilst being able to harvest a viable wind resource, which often means elevated and exposed locations'.</i></p>
RE03.23	<p>The respondent seeks an amendment to paragraph 5.5.2 so that it reads as follows (the additional text being requested is underlined) in accordance with the Carmarthenshire LDP:</p> <p>C Turbine Size and Scale - Small scale turbines.... such as buildings, trees or hedges. <u>Small turbines are required to be located near and closely related to existing buildings or structure of a similar nature. Turbines which are out of character with the area, in terms of their size or design, being over-dominant in the area, will be refused.</u></p>	See Comments for RE03.22, above.
RE03.24	<p>The respondent seeks an amendment to paragraph 5.5.2 so that it reads as follows (the additional text being requested is underlined, and deleted text is marked as strikethrough):</p> <p>C Turbine Layout - Although there may be scope.... the same angle of view. In all cases, turbine layout should respect the underlying landform and, where possible, groups of turbines should be located at very similar elevations.</p> <p>The respondent also comments that in a group of two or more turbines, the turbines need to be positioned so that the distance between them is 3-10 rotor diameters, as indicated in TAN 8.</p>	<p>The consultants comment as follows: No change required – the deletion of the phrase '<i>where possible</i>' will unduly restrict design. The following guidance is noted in respect of landform:</p> <p><i>"It is very difficult to design a wind farm upon a variable landform, such as undulating, rugged moorland or hills, without presenting a confusing image. This is because the wind turbines will be seen from different directions, at varying elevations and spacing, and against varying backdrops. To avoid this effect, it is generally preferable for wind turbines to be grouped on the most level part of a site so the development appears more cohesive, rather than as a poorly related group of turbines."</i></p> <p>[Siting and designing wind farms in the landscape, SNH, August 2017; Section 3.24]</p>

Reference	Summary of Respondent's Response:	Officer Response:
	<p>The design iteration process undertaken by the applicant to mitigate the visual impacts must be shown clearly in the planning application to explain why the proposed positioning and grouping is considered to be the most suitable. Alternative layouts should be explored in relation to the most sensitive viewpoints.</p>	<p>These are matters for individual cases and consideration in relation to local landform characteristics, key viewpoints, and other site-specific factors.</p> <p>TAN 8 states that '<i>Wind turbines need to be positioned so that the distance between them are around 3-10 rotor diameters.</i>' [Annex C, Section 2.8, p.35]</p>
RE03.25	<p>The respondent seeks an amendment to paragraph 5.5.2 so that it reads as follows (the additional text being requested is underlined):</p> <p>C. Micro-siting - Relocation of one or more... at the construction stage. It is important to ensure that micro-siting considerations may not only affect wind turbine locations <u>and separation</u>, but also the horizontal.... of any wind turbine proposal.</p> <p>The red edge of the site location plan and the representation of the potential swept area(s) <u>should include any allowance being requested by the developer for micro-siting. This will help to ensure that minimum requirements for separation from other turbines, residential properties and vegetation (such as hedgelines), as well as topple distances, will not be compromised by the use of micro-siting allowances.</u></p> <p><u>A consistent and accurate grid reference should be used for the position of each turbine and the site plan should be of a scale to allow the positioning to be checked within a very small tolerance (as with building plans).</u></p> <p><u>If, after an application has been submitted and validated, a developer wishes to alter the positioning of any element of the development beyond the micro-siting allowance requested, this would be considered a substantial alteration and would require a new planning application.</u></p>	<p>The consultants comment as follows: We regard the insertion of the word '<i>separation</i>' as an unnecessary addition which is not informative in qualifying the statement – achieving the optimum separation distance is part of the proper consideration of the siting and location of turbines.</p> <p>Agree to add the text contained in the third paragraph beginning "The red edge..."</p> <p>In the fourth paragraph, the consultants do not consider that all of the additional details being asked for are required, and suggest that, for consistency, the phrase '<i>within a very small tolerance</i>' needs to be deleted and the phrase '<i>within the limits established by the permitted micro-siting tolerance</i>' should be inserted.</p> <p>The final sentence of the fourth paragraph appears to remove the option of an application to vary an existing application - this is a judgement that has to be made on a case by case basis at the application validation stage.</p>

Reference	Summary of Respondent's Response:	Officer Response:
RE03.26	<p>The respondent seeks an amendment to paragraph 5.5.2 so that it reads as follows (the additional text being requested is underlined):</p> <p>C Ancillary Infrastructure - Landscape and visual impacts of any ancillary development, <u>the cumulative effects</u> and visual conflicts between turbines and ancillary structures should be minimised.....</p>	<p>The consultants comment as follows: We suggest the following amendment: delete all text from 'the cumulative effects..' onwards and insert the following text: <u>"...the cumulative landscape and visual effects arising from the combination of turbines and ancillary structures should be minimised..."</u></p>
RE03.27	<p>The respondent seeks an addition to paragraph 5.6.4 to include the following text:</p> <p>5.6.4 Photomontages should be provided in addition to wirelines and should show the associated infrastructure, not just the turbines ie. any associated buildings, masts, tracks, vegetation removal and above ground grid connections.</p>	<p>Disagree, the consultants comment that whilst support is given to the provision by the applicant of supporting photomontages and wireframe diagrams in some circumstances, this is a matter for the planning officer to determine during the early stages of the planning application process, which is consistent with paragraph 5.6.4, as drafted.</p>
RE03.28	<p>The respondent seeks an amendment to paragraph 5.10.1 so that it reads as follows (the additional text being requested is underlined):</p> <p>5.10.1 Turbines produce mechanical noise..... all planning applications are expected to be accompanied by a <u>site specific</u> Noise Assessment.</p> <p>The respondent explains that the phrase "site specific" is recommended because, on occasion, applicants have submitted assessments from "similar" sites or used wind data collected at sites some distance away, and this is simply not accurate enough.</p>	<p>Agree. The addition of the term "site specific" is used in appendix A which provides further guidance, therefore making it consistent.</p>
RE03.29	<p>The respondent seeks an amendment to paragraph 5.10.2 as they believe an appropriate distance" is far too vague to have any real meaning. Noise can be greater at a lower level (downhill) than on the same level, and at several rotor-diameters distance rather than close to the turbine. The respondent suggests that</p>	<p>Disagree. Paragraph 5.10.2 requires that all turbines are required to accord with ETSU-R-97.</p> <p>Guidance contained within Appendix A refers to cumulative noise assessments.</p> <p>Noise conditions are applied to applications and each are tailored depending on the conclusions</p>

Reference	Summary of Respondent's Response:	Officer Response:
	<p>at the very least, a planning condition should be attached where a turbine is within the distance cited for potential shadow flicker to require a noise assessment to be carried out when the turbine becomes operational, to prove that it is operating within ETSU noise limits.</p> <p>The amended text should read as follows (the additional text being requested is underlined):</p> <p><u>Full site-specific background noise studies should be submitted with the application, and these should exclude the effects of existing turbines. Cumulative turbine noise calculations should also be provided where there are other proposed, consented or operational turbines in the area, not just for the properties nearest to the application site but also for those properties most likely to be cumulatively affected.</u></p>	<p>of the noise report. The noise conditions are sufficient for enforcement, making the request for a further noise assessment unnecessary.</p>
RE03.30	<p>The respondent seeks an additional bullet point to the summary box in section 5.10:</p> <ul style="list-style-type: none"> • Planning conditions will require that, when there is any likelihood that noise conditions cannot be met or are not being complied with, the costs for an independent noise assessment will be met by the developer. 	<p>Disagree, the applied noise condition(s) indicate that the cost of survey rests with the developer.</p>
RE03.31	<p>The respondent seeks an amendment to paragraph 5.11.2 so that it reads as follows (the additional text being requested is underlined), in order to reflect the latest studies published by the University of Exeter:</p> <p>5.11.2 Bats and their roosts..... Surveys will also identify what time of the year the bats are utilising the site as activity changes throughout the year. <u>This is particularly important for those species identified as high risk or, where large turbines are proposed, are high-flying</u></p>	<p>Disagree. There is no need to differentiate between large and small turbines here. A full assessment of the impacts on bats will be required, whether they are low or high flyers.</p>

Reference	Summary of Respondent's Response:	Officer Response:
	<u>species</u> , which will exploit open habitats.....	
RE03.32	<p>The respondent seeks an additional bullet point to the summary box about Bat Assessments in section 5.11:</p> <ul style="list-style-type: none"> • Where site boundaries are close to the development, the survey work should extend beyond the boundary. 	<p>Agree in part, the following addition has been made to the bullet point:</p> <p>“...and should be at the turbine location and nearby habitat boundaries, for example, hedgerows, trees, woodlands.”</p>
RE03.33	<p>The respondent seeks the addition of two bullet points to paragraph 5.11.5, which are in line with Ceredigion guidance and Scottish National Heritage bird guidance:</p> <ul style="list-style-type: none"> • A breeding bird survey and a winter bird survey should be provided as a minimum. • Where protected species are identified, mitigation should be provided to avoid any displacement. 	<p>Disagree, NRW have been consulted and have approved our approach as detailed. This advice is also reflected in the adopted Nature Conservation SPG.</p>
RE03.34	<p>The respondent seeks an amendment to paragraph 5.13.4 so that it reads as follows (the additional text being requested is underlined):</p> <p>5.13.4 Turbines also...Turbines should be sited away from radio and microwave signal corridors and should not impact upon <u>emergency service communication links</u>, domestic TV, radio reception, and <u>mobile telephone</u> or mobile, <u>satellite or community wi-fi</u> broadband. Where interference cannot be avoided, mitigation measures will be required <u>to be put in place</u> by the developer.</p>	<p>Agree, suggested changes to be incorporated in to paragraph 5.13.4.</p>
RE03.35	<p>The respondent seeks the addition of a paragraph:</p> <p>5.13.5 A Residential Amenities Assessment should be carried out for every residential or holiday property within 10 times tip height. A wider study area of 1 to 2km will be more appropriate for large and very large turbines (over 65m in height).</p>	<p>Disagree, Residential Amenity Assessments have been carried out on a small number of occasions. They are not required on the majority of cases as the LVIA will assess such impacts.</p>

Reference	Summary of Respondent's Response:	Officer Response:
RE03.36	<p>The respondent seeks the addition of a paragraph:</p> <p>5.13.6 An RAA is additional to the assessment of visual impact on residential amenity that should be included in the LVIA.</p>	<p>Disagree, Residential Amenity Assessments have been carried out on a small number of occasions. They are not required on the majority of cases as the LVIA will assess such impacts.</p>
RE03.37	<p>The respondent seeks the addition of a paragraph, following an analysis of appeal decisions quoted in the Gwynedd SPG.:</p> <p>5.13.7 Important factors include the bulk and width of the structure(s) as well as height and proximity, and the proportion of the outlook from the property and outside seating areas which would be occupied by the development, and whether turbines would be visible on more than one side of a property.</p>	<p>Disagree, however, it is acknowledged that there should be a bit more guidance on residential amenity. The following should be added to paragraph 5.13.1 –</p> <p>“Careful consideration should be given when siting turbines to their relationship with nearby residential properties, in order to prevent an unacceptable overbearing impact on the residential amenity of these dwellings.”</p>
RE03.38	<p>The respondent seeks an amendment to paragraph 5.14.1 so that it reads as follows (the additional text being requested is underlined and deleted text is marked as strikethrough):</p> <p>5.14.1 Turbines should be located an appropriate distance from roads, railways, buildings, <u>power lines</u>, <u>BT lines</u> and public <u>footpaths and</u> open spaces. The appropriate distance otherwise known as the “topple distance” which is calculated as being the height of the turbine <u>or, in the case of power lines, a distance in accordance with the Electricity Council Standards for overhead line clearances.</u></p>	<p>Agree in part, add reference to overhead lines (power and telecommunication), and public footpaths. Also include the addition of the following text: “ In the case of overhead power lines, separation distances should accord with the Electricity Council Standard 44-8.”</p>
RE03.39	<p>The respondent seeks the addition of a paragraph, as stated in the Carmarthenshire LDP:</p> <p>5.14.3 Existing bridleways and footpaths shall be safeguarded with no permanent loss to the length or quality of trails by any re-routing necessary to avoid the topple distance.</p>	<p>Agree in part. A new paragraph to be added to reflect that information set out in the LDP:</p> <p>5.15.3 In siting turbines, existing bridleways, cycle ways and footpaths shall be safeguarded with no permanent loss to the length and quality of trails or paths. Temporary and appropriate re-routing of public rights of way during construction will be required.</p>

Reference	Summary of Respondent's Response:	Officer Response:
RE03.40	<p>The respondent seeks an amendment to the bullet point in the summary box for Public Accessibility/Rights of Way Considerations, so that it reads as follows (the additional text being requested is underlined):</p> <ul style="list-style-type: none"> • Consideration should be given to the amenity, health and safety of all users of the right of way. Turbine blades should not over sail public rights of way. <u>Regard should also be given to positioning in order to safeguard pedestrians, riders and passing traffic from injury due to ice throw or catastrophic equipment failure eg. detachment of moving blade(s).</u> 	<p>Disagree, TAN 8 – Annex C para 2.34 states that ice build-up is unlikely to present problems on the majority of sites in Wales. Furthermore, there is no known evidence of separation distances which overcome ice throw.</p>
RE03.41	<p>The respondent seeks an amendment to paragraph 5.16.1 so that it reads as follows (the additional text being requested is underlined):</p> <p>5.16.1 Some turbines will be located.... Applications are expected to be accompanied with a Traffic Management Plan, <u>providing an assessment of the impact on traffic volumes from construction vehicle numbers. The environmental impact of all proposed physical works and operation along the extent of the abnormal load and construction transport routes will be considered as part of the environmental assessment of the development.</u></p>	<p>Agree, add the following to the end of paragraph 5.16.1:</p> <p>Applications are expected to be accompanied with a Traffic Management Plan, <u>providing an assessment of the impact on traffic volumes from construction vehicle numbers. The environmental impact of all proposed physical works and operation along the extent of the abnormal load and construction transport routes will be considered as part of the environmental assessment of the development.</u></p>
RE03.42	<p>The respondent seeks an amendment to the Highway Considerations summary box as follows:</p> <ul style="list-style-type: none"> • The developer will be required ... with the delivery of the turbine. <u>Owners of third party land which might be oversailed should be notified as part of the community engagement so that they have an early opportunity to respond.</u> 	<p>Agree in part, add the following text to the end of the first bullet in summary box:</p> <p>“Third party land may also be over-sailed by construction materials. In these instances the developer should contact relevant landowners when planning delivery routes.”</p>

Reference	Summary of Respondent's Response:	Officer Response:
RE03.43	<p>The respondent seeks three additional bullet points to the Highway Considerations summary box as follows:</p> <ul style="list-style-type: none"> • There should be provision made for emergency vehicle access at all times. • The weights of cranes and turbine parts (including transporters) should be declared as well as the overall dimensions. • In line with WAG recommendations, a full Transport Management Plan should be agreed BEFORE planning permission is considered. 	<p>In terms of the first bullet point, disagree, if it is an abnormal load there will be a procedure in place that they would have to notify the police.</p> <p>Agree to the second bullet point to be inserted into the summary box.</p> <p>The third bullet point, agree in part. It is not considered appropriate to have the Plan agreed before a decision as details of the TMP could change once a contractor is on board. Add the following bullet point into the summary box:</p> <ul style="list-style-type: none"> • Early preparation and consideration should be given to a Transport Management Plan.
RE03.44	<p>The respondent seeks the addition of a paragraph to section 5.18:</p> <p>5.18.2 The applicant's environmental impact assessment or environmental statement should take into account the quantity of material to be removed, the transport impacts, and how the material will be disposed of and the consequent environmental impact.</p>	<p>This is not the correct place in the SPG for such information – section 4.4 deals with EIA.</p>
RE03.45	<p>The respondent seeks the addition of a paragraph to section 5.18:</p> <p>5.18.3 Decommissioning costs as well as methods should be submitted, so that an appropriate bond can be secured by the local authority.</p>	<p>Agree in part, such information would be placed in a legal agreement, however, it is suggested to add the following to section 5.18:</p> <p>5.18.2 The Decommissioning Plan should factor in the cost of the decommissioning operation, and consideration be given to entering into a planning obligation to secure site reinstatement.</p>
RE03.46	<p>The respondent seeks the addition of the following to the application checklist on page 23:</p> <ul style="list-style-type: none"> ✓ Applicants should expect to have to meet an acceptable standard in the information they supply to support their application. ✓ They should follow standard guidelines and methodology. ✓ There should be an expectation that if false, misleading or sub-standard information is supplied, the application will be rejected. 	<p>Disagree - if an application is not of a sufficient standard or does not include the information required to determine the application, then it will be invalid and will not be registered until such time as the information is submitted.</p>

Reference	Summary of Respondent's Response:	Officer Response:
	<p>✓ The full suite of required information should be supplied at the time of the application being validated so that it is available for, and can be subject to, the period of public consultation.</p> <p>The respondent also requests the following to be added to the section "Other Items that may be Required":</p> <ul style="list-style-type: none"> • Tourism impact assessment • Electro-magnetic interference – Aviation and Communications (Mobile Telephone and Broadband) • Grid connection route • Community consultation 	<p>Agree to the addition of "Details of Grid Connection" to the list, in addition to "Pre-Application Consultation (if applicable), which will cover details of community consultation. The other requests are matters that will be considered as part of the determination of the application, they do not require specific mentioning in this section.</p>

Representation No. RE04 from the Coal Authority

Reference	Summary of Respondent's Response:	Officer Response:
RE04.01	The respondent has no specific comments to make.	n/a

Representation No. RE05 from Miss Caroline Evans, Brechfa Forest Energy Action Group

Reference	Summary of Respondent's Response:	Officer Response:
RE05.01	The respondent comments that the draft SPG reads well, as did the previous LDP, but is disappointed that the LDP's provisions were regularly ignored resulting in inappropriately sited large and small wind turbines.	The LDP is still in place, this document provides supplementary guidance to support the LDP policies.
RE05.02	Reference is made to section 5.5.2 - B - Factors relating to siting - the impact on the skyline is acknowledged and stated as undesirable, just as it was in the last LDP, but it didn't stop the Council giving permission for Blaengwen and Mynydd y Betws wind turbine developments and the minister giving permission for Brechfa Forest West, all on skylines and making a major impact on the landscape.	The respondent is not seeking a change to the SPG.

Reference	Summary of Respondent's Response:	Officer Response:
RE05.03	The respondent notes that this document also refers to the undesirability of the destruction of woodlands for wind turbine developments and references Brechfa Forest West site for woodland mega-removal.	The respondent is not seeking a change to the SPG.
RE05.04	The respondent notes that section 5.10 makes reference to Noise, as does the LDP but there are continual noise problems from several wind turbine sites are evidence that the LDP's policies did not work and will not work.	The respondent is not seeking a change to the SPG.
RE05.05	The respondent is concerned that the SPG will be ignored in decision making and by developers.	The respondent is not seeking a change to the SPG. The SPG will be a material consideration in the determination of planning applications.

Representation No. RE06 from Mr Simon Ford

Reference	Summary of Respondent's Response:	Officer Response:
RE06.01	The respondent comments that the part of the website inviting comments on the SPG failed to provide a link to the SPG.	The respondent is not seeking a change to the SPG. The SPG could be found on the Planning pages, however, this is noted for future consultations.

Further Changes required to the SPG

- Update paragraph 5.2.4 – Brechfa Forest West is now operational and should be reflected in the text.
- 4.10 Ecological Considerations – As it is a material planning consideration, the second bullet point to be changed by deleting the word “should” and replacing it with “must” so that it reads as follows: “Ecological benefits and appropriate mitigation must be considered as part of the application.”
- 4.10.1 – Amend the first sentence to include reference to habitats as well as species, so that it reads as follows: “The development of renewable energy schemes has the potential to harm habitats and species. Developers will be expected to maximise the ecological potential of the site, whilst ensuring that there is no demonstrable harm to statutorily protected habitats and species,
- 4.10.1 – typographical amendment to that the end of first sentence replacing “or the Environment Act 2016 to “on the Environment Act”.
- 4.10.3 – Update the document referred to as the 2013 Guidelines to 2017.
- 4.10.5 – Add the following documents:
 - CIEEM (2017) [Guidelines for Preliminary Ecological Appraisal, 2nd edition](#). Chartered Institute of Ecology and Environmental Management, Winchester.

Report to Community Scrutiny

- CIEEM (2018) [Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine](#). Chartered Institute of Ecology and Environmental Management, Winchester.