

# Pembrokeshire Coast National Park Authority Cumulative Impact of Wind Turbines on Landscape and Visual Amenity

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Supplementary Planning Guidance to the Local Development Plan **1** for the  
Pembrokeshire Coast National Park

Adopted 11<sup>th</sup> December 2013

**Interim Supplementary Planning Guidance Local Development Plan 2 –NPA  
September 2020**

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### Abbreviations used in text

CLVIA Cumulative Landscape and Visual Impact Assessment

EIA Environmental impact assessment

GLVIA Guidelines for landscape and visual impact assessment

GIS Geographic information system

km Kilometres

LVIA Landscape and visual impact assessment

m metres

ZTV Zone of Theoretical Visibility

Cover photos:

Left- turbine in National Park-Richard James, Pembrokeshire Coast National Park Authority.

Middle- turbines near Herbrandston, Pembrokeshire.

Right- Alltwalis windfarm, Carmarthenshire.

# **A**

**INTRODUCTION**

**ISSUES**

**OBJECTIVES**

**CONTEXT**

# 1. Introduction and scope of guidance

- 1.1. The Pembrokeshire Coast National Park Authority adopted the Pembrokeshire Coast National Park Local Development Plan (September 2010). This supplementary planning provided more detailed guidance on the way in which the Local Development Plan policy (in particular, Policy 33 Renewable and Low Carbon Energy) was applied. Paragraph 6.5.4, of Planning Policy Wales (Edition 10, December 2018) advises that local planning authorities need to consider both landward and seaward pressures and the impacts of these pressures. The impacts associated with such activities can be widespread and overlap between sea and coastline. They may relate to inappropriate land use, pressure for services and facilities, and impacts on existing businesses and employment as well as the natural and historic character of the coastline and seascape where there is extensive inter-visibility between land and sea along the coastline.
  
- 1.2. While only the policies in the development plan have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise), Supplementary Planning Guidance may be taken into account as a material planning consideration. In making decisions on matters that come before it, the Welsh Government and the Planning Inspectorate will give substantial weight to approved supplementary planning guidance which derives out of and has been prepared consistent with the approach set out in national policy on the preparation of Local Development Plans. Put simply the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:
  - Whether the proposal meets the requirements of policies within the Development Plan; and
  - Weigh up all the other planning considerations to see whether they outweigh the conclusion of the Development Plan.
  
- 1.3. This document was originally prepared by three local planning authorities (Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Carmarthenshire County Council). The National Park Authority published the original document as draft Supplementary Planning Guidance and subjected it to consultation. The guidance was adopted as Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan, by the National Park Authority, on the 11<sup>th</sup> December 2013. A report of consultations detailing how the guidance was consulted for Local Development Plan 1 upon is available to view on the Authority's website. This guidance has been rolled over to be effective for development management purposes for the Pembrokeshire Coast National Park Local Development Plan 2 from the date of Plan adoption. -
  
- 1.4. The document focuses on cumulative impact issues and should be read in

conjunction with other national and Local Development Plan policies in particular Policy 33 Renewable and Low Carbon Energy (see 1.19 and **Appendix A**) and guidance on landscape, seascape and visual impact assessment (LVIA). The Authority has also produced guidance on the siting of wind turbines within its Renewable Energy Supplementary Planning Guidance, which should be used in conjunction with this guidance.

- 1.5. It is structured so that the background context and objectives are set out in **Part A** (Sections 1-**5**) and **Appendix A**- Section **9** and the step by step guide, tools and checklists set out in **Part B** (Sections**6-8**).

#### **Environmental Impact Assessment requirements in relation to cumulative effects**

- 1.6. Cumulative impact assessment is set within the framework of Environmental Impact Assessment (EIA). This is an evidence-based procedure which sets out the likely significant effects of a proposed development on the environment so they can be taken into account in the planning process. The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999<sup>1</sup>, consolidate previous regulations and set out the current requirements for meeting European Directive 85/337/EEC.

- 1.7. EIA may be required for development falling under Schedule 2 of the Regulations. The threshold for wind turbine developments is more than 2 turbines or where the hub height of any turbine or any other structure exceeds 15 metres (Regulation 2(1)).

- 1.8. For development proposals which meet or exceed these criteria or threshold, or located within a sensitive area (as understood in the Regulations), the local planning authority will provide a 'screening opinion', where requested, based on whether the development may give rise to significant environmental effects. Schedule 3 selection criteria for screening Schedule 2 developments states that:

*'The characteristics of development must be considered having regard, in particular, to-*

*a) the size of development*

*b) the cumulation with other development*

*.....'*

- 1.9. If a proposed development requires an Environmental Impact Assessment, then Schedule 4, Part 1 of the EIA Regulations states that:

*'a description of the likely significant effects of the Development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects of the development.....'(4)*

- 1.10. Circular 02/99, which provides guidance on the Regulations, states:

*'in judging.... the effects of a development....local planning authorities*

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<sup>1</sup> SI No. 0293

*should always have regard to the possible cumulative effects with any existing or approved development'* (paragraph 46).

#### **Definition of cumulative impact**

- 1.11. For the purposes of this guidance the following definition of cumulative impacts, first used by Scottish Natural Heritage (SNH)<sup>2</sup>, applies:  
*'the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together.'* (paragraph 7)
- 1.12. An assessment of *both* combined and additional effects will be required from the developer where a cumulative landscape and visual impact assessment (CLVIA) is considered necessary. The reason for this is that the Local Planning Authorities consider that the landscapes and seascapes of Pembrokeshire and Carmarthenshire have a range of thresholds of acceptable change for wind energy development beyond which further development would be inappropriate in landscape and visual terms. The developer is therefore required to provide sufficient information to enable the Local Planning Authorities to decide if this threshold has been reached in a given area.
- 1.13. Factors that contribute to the cumulative impact of wind turbine development on landscape and visual amenity include:
  - The distance between individual wind turbine developments
  - The distance and area over which they are intervisible
  - The overall character of landscape and its sensitivity to wind turbine development
  - The siting and design of wind turbines and wind farms themselves
  - The way in which landscape is experienced.

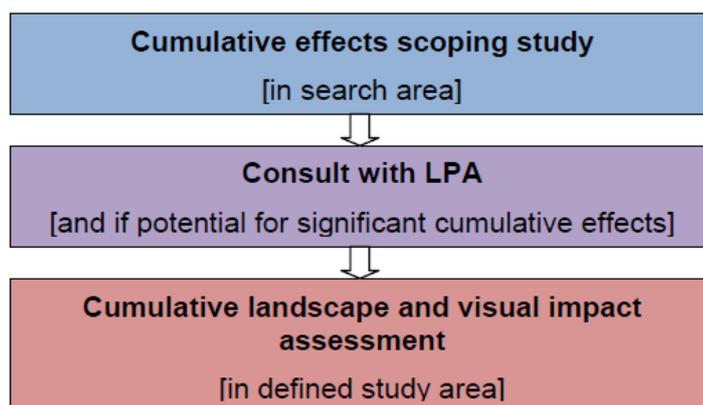
#### **When will a cumulative assessment will be needed?**

- 1.14. Cumulative scoping assessments should be carried out where the proposed wind turbine development may be seen in conjunction with other wind turbine developments. These developments will include existing, under construction and consented wind turbines and those 'in planning' i.e. at planning application stage.
- 1.15. Detailed cumulative impact assessments are only required where it is considered that the proposal could result in *significant* cumulative impact which could affect the eventual planning decision. The scale and complexity of assessments should be proportionate to the impacts (Scottish Natural Heritage cumulative guidance<sup>2</sup> paragraph 56).
- 1.16. These requirements are summarised in **Figure 1** and set out in more detail in **Figure 5**.

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<sup>2</sup> 'Assessing the Cumulative Impact of Onshore Wind Energy Developments', Scottish Natural Heritage, March 2012

**Figure 1 Outline of process**



- 1.17. Whilst the threshold for requiring EIA is turbines above 15m high to hub (as defined in 1.5) this does not mean that cumulative effects involving turbines at or below 15m to hub will not occur. In respect of this size of turbine, cumulative effects will need to be addressed in documents supporting the planning application taking note of the principles and objectives in this SPG. They should also be taken into account where they are located in the search or study area in a CLVIA for a larger wind turbine development. In both cases, the level of detail should be proportionate. More detail of what information would be required can be found in **Table 4**.

#### **Functional objectives of the guidance**

- 1.18. The guidelines are intended to:
- Set out the emerging cumulative impact issues in Pembrokeshire and Carmarthenshire (**Section 2**).
  - Set out clear objectives to accommodate onshore wind energy avoiding significant cumulative impact (**Section 2**).
  - Set out guidelines as to what information and assessment is required for wind turbine developments of different sizes (**Sections 3-8**).
  - Work within planning policy and complement existing guidance (**Appendix A**).
  - Reflect good CLVIA practice (**Appendix B and C**).

#### **Planning Context**

- 1.19. The current planning context relating to onshore wind energy is set out in **Appendix A**. This may change over time and it is recommended that Local Planning Authorities websites are checked and officers are contacted to ensure that up to date policies and guidance are noted. The policies must be fully taken into account in locating, designing and assessing wind energy developments and this guidance is intended to complement and support these policies in respect of cumulative impacts.
- 1.20. There are a number of relevant general policies but key policies (for Pembrokeshire Coast National Park include:

- Planning Policy Wales Edition 5 [10 December 2018](#) (PPW)
- Technical Advice Note (TAN) 8: Planning Policy for Renewable Energy.
- Pembrokeshire Coast National Park Local Development Plan 2 (LDP) Policies especially Policy 8 Special Qualities, Policy [14 Conservation of the Pembrokeshire Coast National Park](#) and Policy 33 [Renewable and Low Carbon Energy](#), Renewable Energy [Interim SPG for LDP 2](#) and Landscape Character [Interim SPG for LDP 2 and Seascape Interim Supplementary Planning Guidance](#).

### **Consulting Local Planning Authorities**

- 1.21. Discussions between prospective developers and relevant Local Planning Authorities is encouraged at the pre-application and pre-validation stage. There may be a need to consult more than one authority where the scoping search area crosses borders. This guidance will provide the framework for those discussions on cumulative landscape, seascape and visual issues.
- 1.22. It is accepted that many experienced cumulative impact assessors will follow their own methods which will be refined and improved over time and so this guidance is not intended to be prescriptive in all respects. However, it does express the concerns of the Local Planning Authorities and will be used as a yardstick with which planning officers will judge the adequacy and conclusions of CLVIAs. Any major deviation should be justified by the relevant consultant.

## **2. Assessing cumulative impacts- issues and objectives**

### **Landscape overview**

- 2.1. Pembrokeshire and Carmarthenshire display a wide range of landscape and seascape character types. The area forms the exposed south western peninsula of Wales with a long and varied coastline with superb seascapes, some with long views to islands and to the Gower. The land mass is penetrated by two major water bodies- Milford Haven and the Daugleddau to the west and the Tywi and Taf valleys with their confluence and estuary running into Carmarthen Bay to the east. The Teifi valley defines the northern boundaries of the counties running into Cardigan Bay. Inland there are a number of prominent hills- the Preselis to the west, Black Mountain to the east and the south western tip of the Cambrians to the north east. Between the hills and coast there are a range of mainly tranquil pastoral rural landscapes on lower hills and plateau incised with smaller valleys.
- 2.2. The settlement pattern is mainly dispersed and rural. There are numerous historical settlements and features such as castles, forts and religious sites. The main settlements are linked by a few A roads linking the ports, ferries, energy complexes and tourist destinations to the west with Swansea, Cardiff and London. These routes are used by residents, commercial and tourist/visitor traffic. Power lines run from major users and providers such as from Pembroke Power Station on Milford Haven east along a route set back from the south coast.

### **Designations**

- 2.3. There are a number of designated landscapes which need to be considered. Within the area, Pembrokeshire Coast National Park along with the Heritage Coast covers the most spectacular coastlines and their related hinterland, the distinctive Preseli Hills and the ria of the Daugleddau. Outside the area to the east, there is the Brecon Beacons National Park massif and, to the south east across the Loughor estuary, the Gower Area of Outstanding Natural Beauty.
- 2.4. There are a number of registered Landscapes of Historic Interest including the Milford Haven waterway, St David's Peninsula and Ramsey Island, Tywi valley, Taf and Tywi estuary, Skomer Island, and Black Mountain and Mynydd Myddfai which are in the outstanding category and the Lower Teifi valley, Drefach and Felindre, Newport and Carningli, Pen Caer (Strumble Head), Stackpole Warren and Manorbier which are in the special category.
- 2.5. In Carmarthenshire there are a series of Special Landscape Areas (SLAs) which include: Tywi Valley, Mynydd Llanllwni, Cothi Valley, Mynydd Pencarreg, North-eastern Uplands, The Carmarthen Bay Coastal Area, Cych Valley, Teifi Valley, Inland cliffs, Afon Morlais Valley, Afon Lliedi Valley, V-shaped valley north of Pwll, Loughor Valley, Coastal plain (east) and the Coastal plain (salt marsh, sand dunes, beach and mudflats).

### **Generic wind turbine scale**

- 2.6. Figures 2 and 3 illustrate turbine sizes in relation to other features.

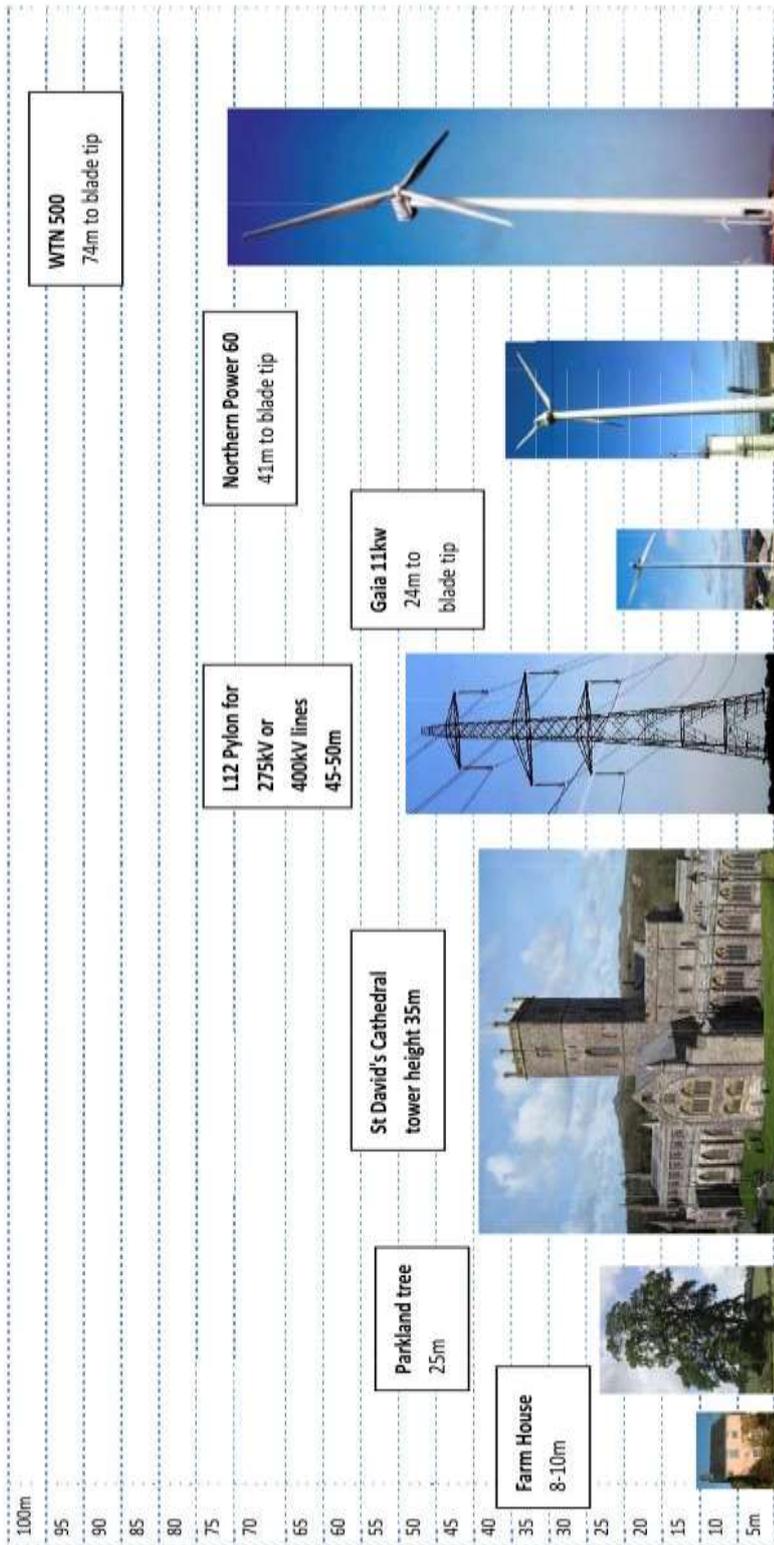
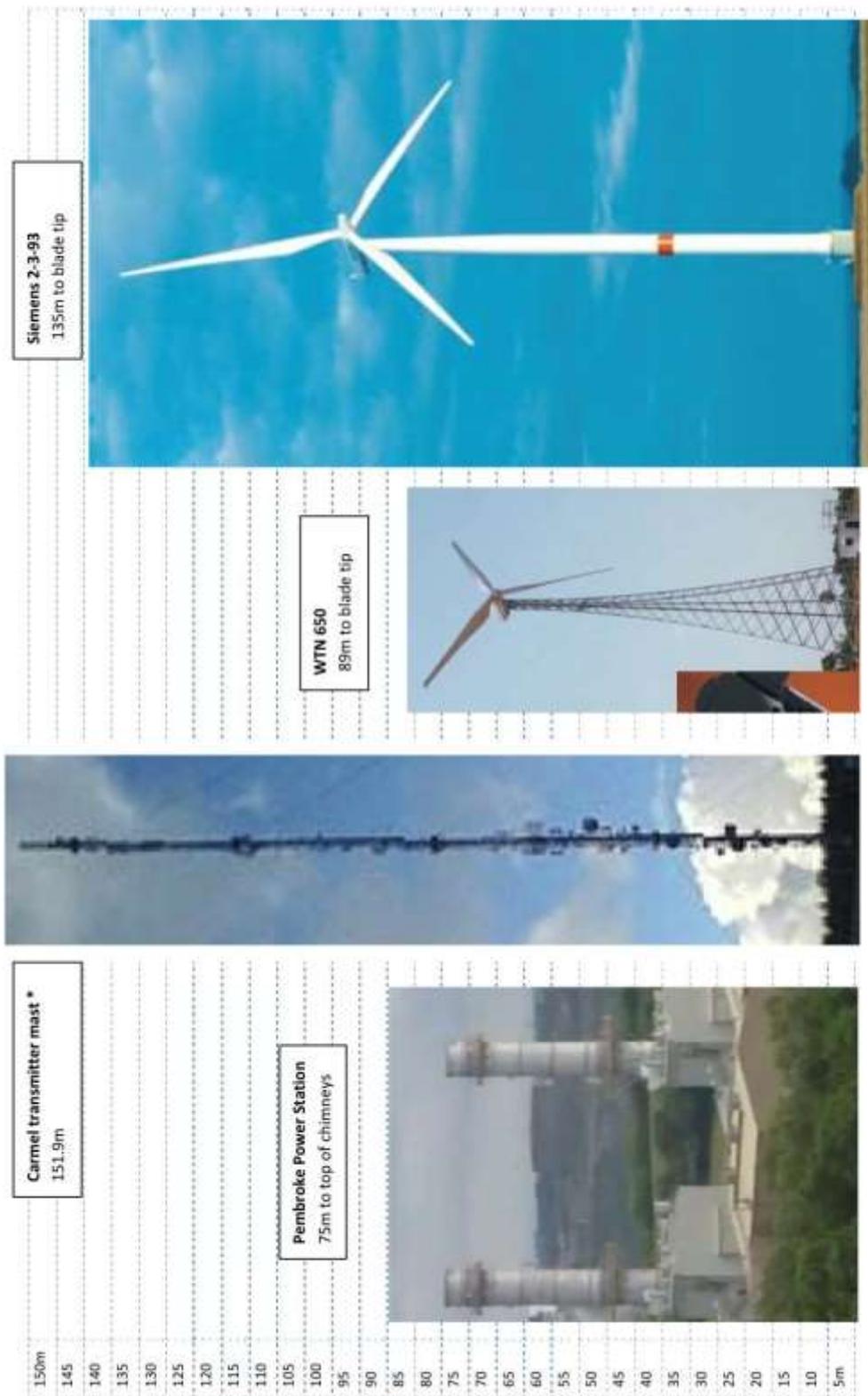


Figure 2: Turbine types and size comparison - small to medium sized turbines



**Figure 3: Turbine types and size comparison - medium large sized turbines**

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## Existing wind turbine development in the area

- 2.7. Wind turbine development has been established in a number of locations with the majority in Carmarthenshire.
- 2.8. In Pembrokeshire, from one 60m high turbine consented in 2002 adjacent to Milford Haven, there are now a number of turbines of a similar size located along the waterway with a number of smaller turbines. There are a few relatively isolated turbines of between 50 and 80m dotted elsewhere about the two counties and numerous smaller single or pairs of turbines between 15-50m to blade tip.

### Issues

- 2.9. Where a number of small and medium sized turbines are proposed in rural parts of the area they may have limited landscape and visual effects on their own but together they may start to have significant cumulative effects on landscape character as well as on visual amenity, particularly in sensitive areas such as the National Park.



Photo 1: More turbines particularly at a larger scale may significantly change landscape character (R.James, PCNPA)

- 2.10. The incremental increase of turbines between and close to the Milford Haven large scale refineries, oil and gas storage and settlements with associated chimney stacks and pylons is potentially leading to a cluttered landscape/seascape of vertical elements.



Photo 2: Some areas appear to have reached capacity with awkward juxtapositions of turbines and clutter with other vertical elements and different size turbines.

- 2.11. Applications for smaller scale wind energy developments are being received close to the Brechfa Forest strategic search area and other large

windfarms which together may have significant cumulative effects on landscape character as well as on visual amenity outside the strategic search area (as at December 2013).



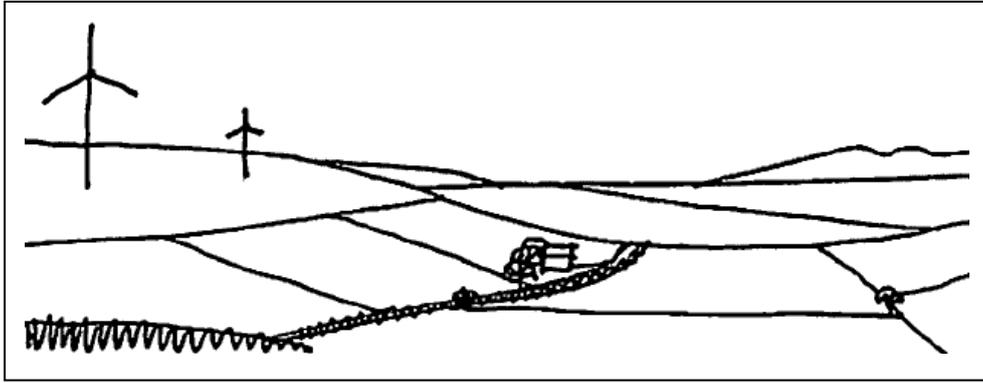
Photo 3: More turbines around the settlement may cumulatively affect its residents' amenity

- 2.12. Some wind turbine developments and applications are located close to power lines. There is potential for 'cumulative' effects with the pylons.

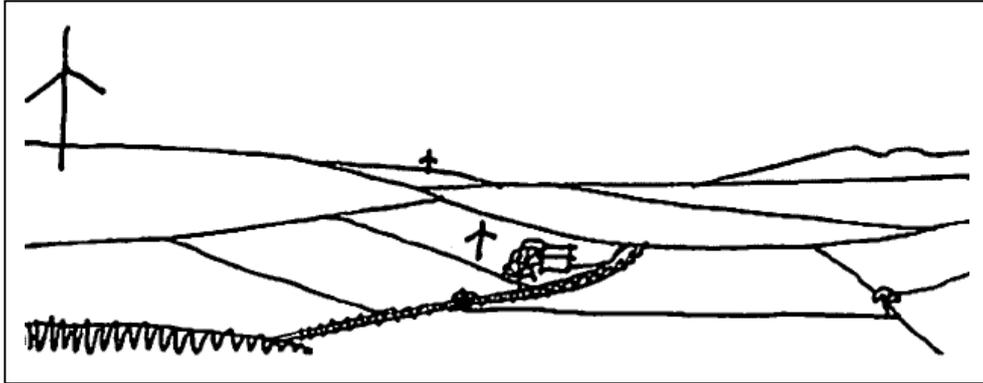


Photo 4: Turbines closer to the background pylons may cumulatively affect landscape character (R.James, PCNPA)

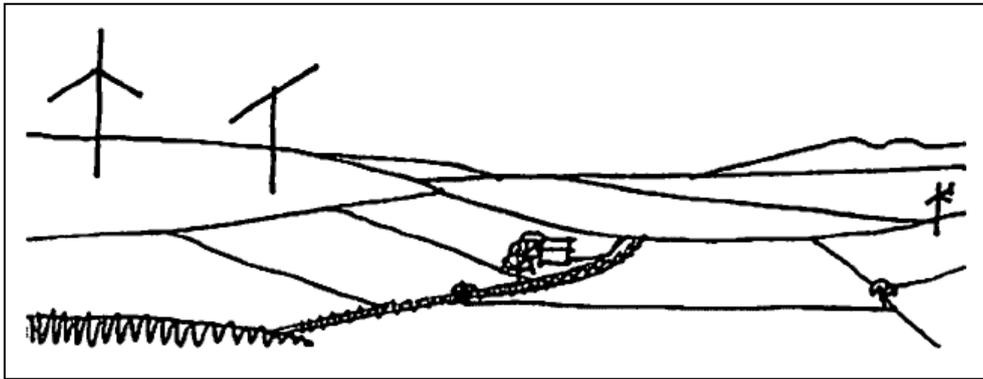
- 2.13. The great variety of turbines sizes, design or their layout close to each other has the potential to cause visual conflict, confusion and/or complexity as already noted above. The following diagrams further illustrate *some* of the potential issues.



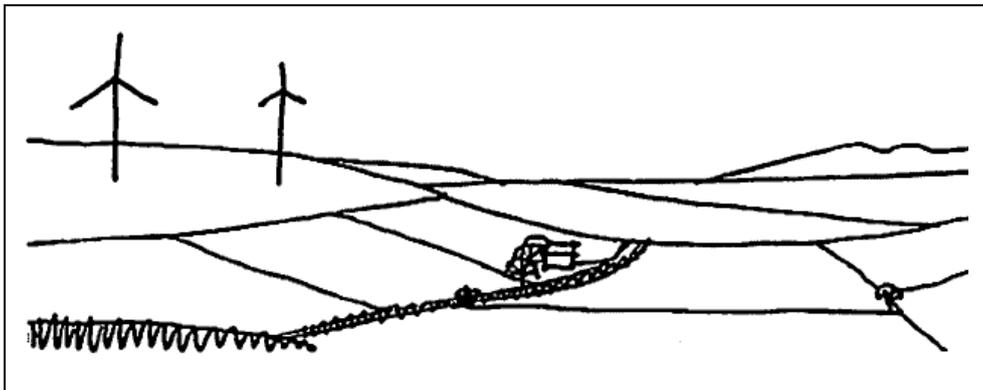
Sketch 1: Difference in turbine sizes can be visually confusing in some situations- the small turbine appears to distort perspective by being closer



Sketch 2: Difference in turbine sizes can make sense in other situations e.g. the close relationship of the smaller turbine with a dwelling and the larger turbine in open country away from settlement



Sketch 3: Different turbine designs can lead to visual conflict/uncoordinated movement of blades



Sketch 4: Different turbine designs/blade lengths can lead to visual conflict and uncoordinated movement of blades i.e. faster blade rotation speeds for smaller blades

2.14. In order to address these issues a number of objectives have been drawn

up, while providing a positive framework for onshore wind energy.

### Key Objectives

2.15. The key objectives are:

- To maintain the integrity and quality of landscape character within the National Park
  - that is no significant adverse change to its special qualities and sensitive characteristics from cumulative wind turbine development. The threshold for acceptable change in these areas is likely to be low.
- In other landscapes outside the strategic search area, to maintain the landscape character
  - that is no significant adverse change in landscape character from cumulative wind turbine development. Significant change here is taken to mean where wind turbines become either the dominant or a key characteristic of a landscape, depending on its sensitivity which shall be defined by the assessment.
- Within the strategic search area, to accept landscape change
  - that is significant change in the landscape character from wind turbine development.
- To avoid development which, in combination, creates the experience of a settlement<sup>3</sup> being in a wind turbine landscape
  - such as being surrounded by wind turbines on two or more sides.
- To avoid development cumulatively creating significant adverse effects on sensitive receptors
  - such as residents, users of recreational/tourism features such as the Wales/Pembrokeshire Coast Path and heritage features.
- To avoid turbines of markedly different designs or scales being located or viewed in juxtaposition with each other.
- To avoid significant adverse effects when viewed in conjunction with other types of development.

**The National Park Authority's Supplementary Planning Guidance on Renewable Energy also provides landscape area specific guidance regarding the siting of turbines.**

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<sup>3</sup> To be read as a settlement in general terms, not as specifically defined in the Development Plans.

## Assessing cumulative landscape impacts

### The landscape resource and LANDMAP

- 2.16. The underpinning landscape information for both Pembrokeshire and Carmarthenshire is LANDMAP. LANDMAP is structured into five aspects- the Geological Landscape, Landscape Habitats, Visual & Sensory, Historic Landscape and Cultural Landscape. The Countryside Council for Wales (now Natural Resource Wales) states that as LANDMAP is the formally adopted methodology for landscape assessment in Wales all landscape work and assessments of the effects arising from a proposals impact on the landscape in Wales should include LANDMAP. [Natural Resources Wales](#) Guidance Note 3 defines how wind energy developments should take LANDMAP into consideration in relation to wind energy LVIAs.
- 2.17. **In Pembrokeshire Coast National Park**, a landscape character assessment has been undertaken based on LANDMAP bringing the aspect areas together in a series of 28 landscape character areas . Sensitivity to wind turbine development has been attributed to these areas by a further study. Both studies are SPG. This information should be used as the landscape baseline within the National Park for studies which include the National Park in their study area.
- 2.18. **Outside the National Park**, LANDMAP can be used as the landscape baseline to derive landscape character areas or similar units, and to attribute sensitivity to each of these areas. Landscape character assessment guidance<sup>4</sup> indicates how to undertake this process and draft, unpublished guidance indicates the relationship between landscape character assessment and LANDMAP. LANDMAP information for each aspect area includes value but this is not the same as sensitivity although it may inform a judgement on this. The Guidelines for Landscape and Visual Impact Assessment<sup>5</sup> (GLVIA) indicate that sensitivity is derived from combining the susceptibility of the receptor to the *type* and scale of *development* combined with the value of the receptor. Value can be derived from LANDMAP and other sources e.g. designations. Landscape character assessment and/or sensitivity studies undertaken by Pembrokeshire County Council or Carmarthenshire County Council in due course should be used as part of the landscape baseline.
- 2.19. The most sensitive landscapes in broad terms are likely to be designated areas such as the National Parks, Area of Outstanding Natural Beauty and their environs, Registered Historic Landscapes and Special Landscape Areas. However, there will be a variation in sensitivity within these designated areas and outside. Certain landscape patterns and features can be susceptible to wind turbine development, such as prominent or complex skylines and settings of historic features. It should be noted that planning policy in Pembrokeshire is not reliant on Special Landscape Areas, but this does not mean that the landscape is less locally valued or

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<sup>4</sup> Landscape Character Assessment, Guidance for England and Scotland, Swanwick, Carys and LUC, Scottish Natural Heritage with the Countryside Agency, 2002.

<sup>5</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and Institute of Environmental Management & Assessment (IEMA), 2013.

sensitive. Overall, it is accepted as a principle that some areas will be able to accommodate more wind turbine development than others.

### **Types of cumulative landscape effect**

- 2.20. Two types of cumulative landscape effects can occur. The first are the direct effects on the physical fabric of the landscape i.e. where a number of different turbine developments, including road modifications, track access and ancillary development, remove or damage a series of landscape components such as trees, hedgerows or hedgebanks. The second effect is on landscape character, where two or more developments introduce new features into a landscape. The effect may be to change the landscape character to the extent that it becomes a different landscape character type.
- 2.21. A combined cumulative landscape effect is a measure of whether the proposed development combined with other wind turbine developments significantly change the character of a landscape. The effective baseline for this is the receiving landscape without turbines. As such, this differs from the assessment of the individual effects of the proposed development which takes on board existing development as part of the baseline. An additional cumulative landscape effect is a measure of how much the proposal contributes to that overall effect. This is most helpful when defined against the existing and approved turbine developments, excluding other proposals. In some cases, other developments in planning may have more potential cumulative effects and this may be mentioned in the cumulative assessment.
- 2.22. A further tool for use in defining combined landscape effects is an examination of the current landscape character of the area with regard to existing turbines and how this may change with the addition of the proposal. The status of landscape character areas in respect of wind turbine development with the possibly preferred status is described below in **Table 1** and illustrated in **Figure 4**:

**Table 1 Landscape types with regard to wind turbine development-descriptions**

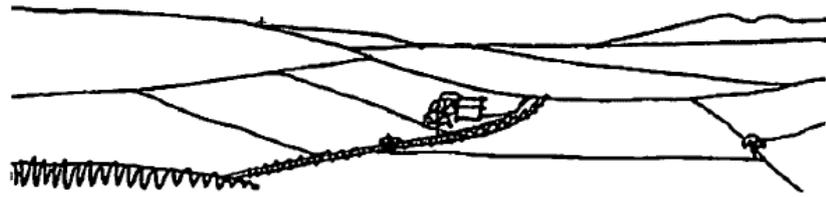
	Landscape type/status	Description/Comments	Location within study area
1	Landscape character area with no wind turbines	No turbines within an area and not visible except at a distance where they are very small or inconspicuous.	This would be the status and objective in sensitive parts of the study area including parts of the National Park, coast and possibly Special Landscape Areas.
2	Landscape character area with occasional wind turbines in it and/or intervisible in another landscape character area/s	Turbines are visible but are not at a scale, number, spacing or extent that makes them a defining/key characteristic. Turbines might be seen occasionally at close quarters but more often within background views.	This is the 'maximum' status for the Pembrokeshire Coast National Park and most of the landscapes of the study area. The Renewable Energy SPG is useful in defining what may be appropriate levels of development in the National Park.
3	Landscape character area with wind turbines	Turbines are located and visible and are at a scale and/or a spacing that makes them <i>one</i> of the defining/key characteristics. Turbines might be seen in the foreground, mid-ground or background. However, there would be other key characteristics which would be strong and there would be sufficient separation between turbines for views without turbines and other characteristics remaining dominant in these parts of the area.	This description may be acceptable for some areas with lower sensitivity but may be above an acceptable threshold for many landscape character areas.
4	Wind turbine landscape	Turbines are frequent and may include extensive wind farms and are the dominant, defining characteristic but there is separation between groups of turbines. However within these areas wind turbines are likely to be visible.	This is highly likely to occur in the Strategic Search Area as approved schemes are implemented.
5	Windfarm	Landscape fully developed as a wind farm with no clear separation between groups of turbines.	Windfarm locations e.g. Alltwalis

2.23. If in combination with other turbines, a proposed turbine or wind farm changes the landscape from one category above to another then there may be a significant *combined* cumulative *landscape* effect. The significance depends on whether the landscape can accommodate wind turbine development or not in terms of its characteristics and sensitivity.

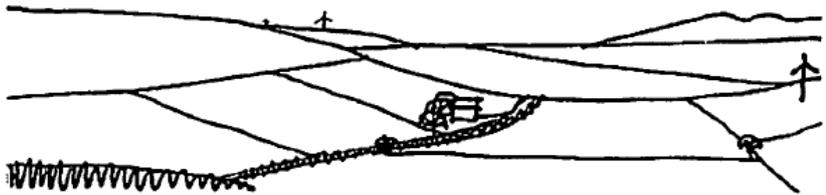
# Figure 4 Landscape types with regard to wind turbine development

(note these are diagrammatic examples only)

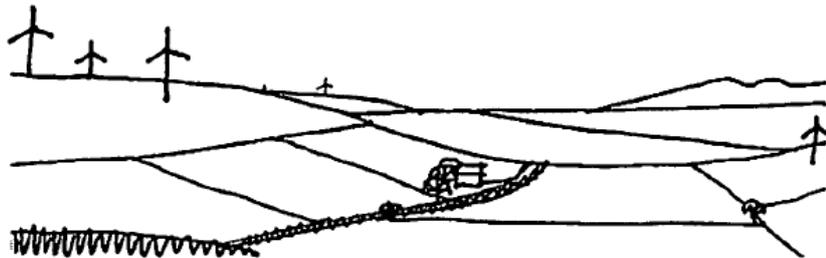
1 Landscape character area with no wind turbines



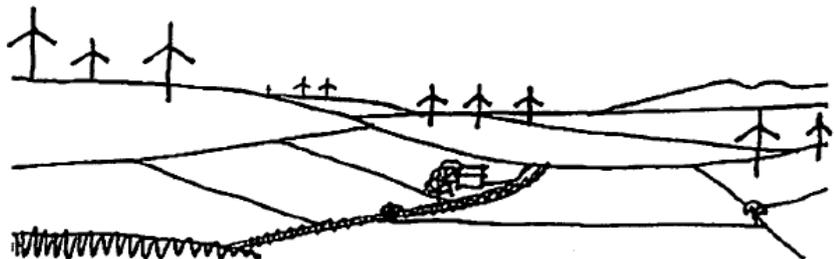
2 Landscape character area with occasional wind turbines in it and/or intervisible in another landscape character area/s



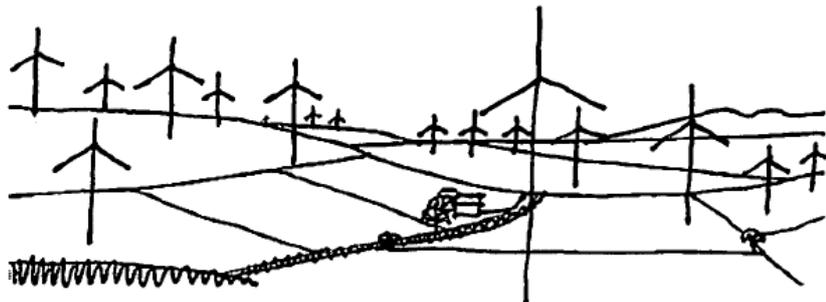
3 Landscape character area with wind turbines



4 Wind turbine landscape



5 Windfarm



## Description and assessment of effects

- 2.24. The description and assessment of the effects should be separated into direct, physical effects and landscape character effects. Both should be divided into combined and additional effects. For larger developments and/or those in or near sensitive areas the level of detail required is likely to be higher than for small-scale developments. There may be a need for addressing the effects of different scenarios either separating existing and consented turbines from proposed turbines or examining effects of a proposal combined with different groups of turbines. A commentary on whether the proposed development would change the status of the landscape type in which it lies would be helpful. The effects can be described by use of tables and/or text depending on the size and complexity of the assessment.
- 2.25. When proposals are located in or near designated landscape areas the cumulative effects on the individual special qualities of those areas should be assessed, with overall conclusions. In the case of Pembrokeshire Coast National Park these are well-defined (see **Appendix A, 9.8**). In other areas, the special qualities may need to be defined as part of the landscape assessment process.

### 3. Assessing cumulative impacts on visual amenity

#### Types of cumulative impact

- 3.1. There are three main types of cumulative visual effect:
- In combination from one (static) viewpoint i.e. where more than one development can be seen within the observer's arc of vision at the same time.
  - In succession from one (static) viewpoint i.e. where the viewer has to turn to see a number of developments around them.
  - Sequential effects on a journey i.e. where more than one wind turbine development can be seen one after the other over a period of time by an observer moving through the landscape.

#### Types of sensitive visual receptor

- 3.2. The sensitivity of a visual receptor (i.e. a person) will be determined by the activity and expectation of the receptor, the location, context and importance of the viewpoint, and the number of receptors. Examples of sensitive receptors are set out in **Table 2** (note that this is not intended as comprehensive).

**Table 2 Potential sensitive receptors**

<p><b>Static receptors</b></p>	<ul style="list-style-type: none"> <li>• Visitors to viewpoints such as hilltops or headlands or scenic viewpoint accessible by car.</li> <li>• Visitors to heritage features such as castles or forts, parks and gardens or listed buildings.</li> <li>• Receptors located in sensitive areas such as the Pembrokeshire Coast or Brecon Beacons National Parks, Heritage Coast and on open access land.</li> <li>• Residents in dwellings whether on the edge of a settlement or located in open countryside.</li> </ul>
<p><b>Receptors that may undergo sequential effects</b></p>	<ul style="list-style-type: none"> <li>• Users of the Wales/Pembrokeshire Coast Path, other footpaths such as the Landsker promoted trail.</li> <li>• Users of the National Cycle route.</li> <li>• Users of footpaths and bridleways.</li> <li>• Users of scenic routes or roads used by tourists.</li> <li>• Recreational sea users such as leisure sailors.</li> </ul>

- 3.3. The Guidelines for Landscape and Visual Impact Assessment<sup>6</sup> (GLVIA) gives further details on identifying receptors.

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<sup>6</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and Institute of Environmental Management & Assessment (IEMA), 2013.

### **Description and assessment of effects**

- 3.4. The assessment of the cumulative effects should be informed by a series of assessments from representative and/or worst-case viewpoints. These should consider both combined and additional effects. The magnitude of cumulative change will depend on the landscape context in which the development is viewed and the scale, nature, duration and frequency of combined or sequential views. For larger developments and/or those in or near sensitive areas the level of detail required will be higher than for small-scale developments. There may be a need for addressing the effects of different scenarios either separating existing and consented turbines from proposed turbines or examining effects of a proposal combined with different groups of turbines. The effects can be described by use of tables and/or text depending on the size and complexity of the assessment.

## 4. Relationship between Onshore and Offshore developments

- 4.1. Whilst it is recognized that the vast majority of cumulative effects that will occur will be between onshore wind turbine developments, the interaction between onshore and offshore wind turbines should also be addressed where applicable.

### Nature of offshore developments

- 4.2. Offshore windfarms tend to be very large developments some distance offshore.

### Information available

- 4.3. A [national](#) seascape assessment<sup>7</sup> has been undertaken which identifies the key sensitivities of regional seascape units to offshore development. This is available on the Natural Resource Wales website. For each regional seascape unit, land that is intervisible with the sea is mapped, with different levels of intensity. This should be used initially to establish the relationship between the proposed development and the seascape unit. Further work should then establish what cumulative effects there may be on the unit. [The Seascape Character Areas for the Pembrokeshire Coast National Park can be viewed in the Seascapes Supplementary Planning Guidance.](#)

### Approach

- 4.4. Bearing in mind the particular sensitivity of the coastline and seascape and various receptors along it, viewpoints should be selected in representative, sensitive and/or worse case locations. These should be located in all the relevant regional seascape units in the defined study area. Wirelines and/or photomontages should illustrate the wind turbines along with onshore wind turbines. An assessment of the effects should be made from each of these and then used to inform judgements on landscape, seascape and visual cumulative effects.

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<sup>7</sup> [National Seascape Assessment for Wales, NRW Evidence Report No 80, November 2015.](#)

## 5. Cumulative effects with other types of development

- 5.1. Current good practice guidance focuses on the cumulative effects with developments of the same type i.e. wind turbines. However, [Natural Resources Wales](#) Guidance Note 3 states that a CLVIA should describe and assess any significant cumulative effects potentially with other non-energy developments. For example, a dwelling with a large chimney or pylon on one side and a proposed wind turbine on the other may undergo a significant cumulative effect. Similarly the juxtaposition of the two elements may change or dominate the landscape character of the area. In terms of the standard GLVIA method, the chimneys or pylons will form part of the baseline landscape character i.e. a landscape with large modern vertical elements. As such, the introduction of further vertical elements such as wind turbines might be argued to be ‘in character’ with the baseline landscape. This may be the case but needs to be tested against the following questions:
- Does the proposed development ‘fit’ in terms of scale, layout and design so its composition respects the pattern of landscape as well as the other vertical elements, without causing visual conflict or confusion?
  - Does the proposed development in combination with other developments change the character of the landscape to become a key or the dominant characteristic?
  - Would the effects on a visual receptor become significantly adverse with the addition of a wind turbine taking into account the existing effect of the existing development such as the chimney or pylon?
- 5.2. The recommended approach is that the interaction between the proposed development and other types of development should be identified and described with the likely effects on both landscape character and visual receptors defined. Photomontages may be helpful to illustrate this interaction in some cases but it is unlikely to be necessary to use ZTVs.

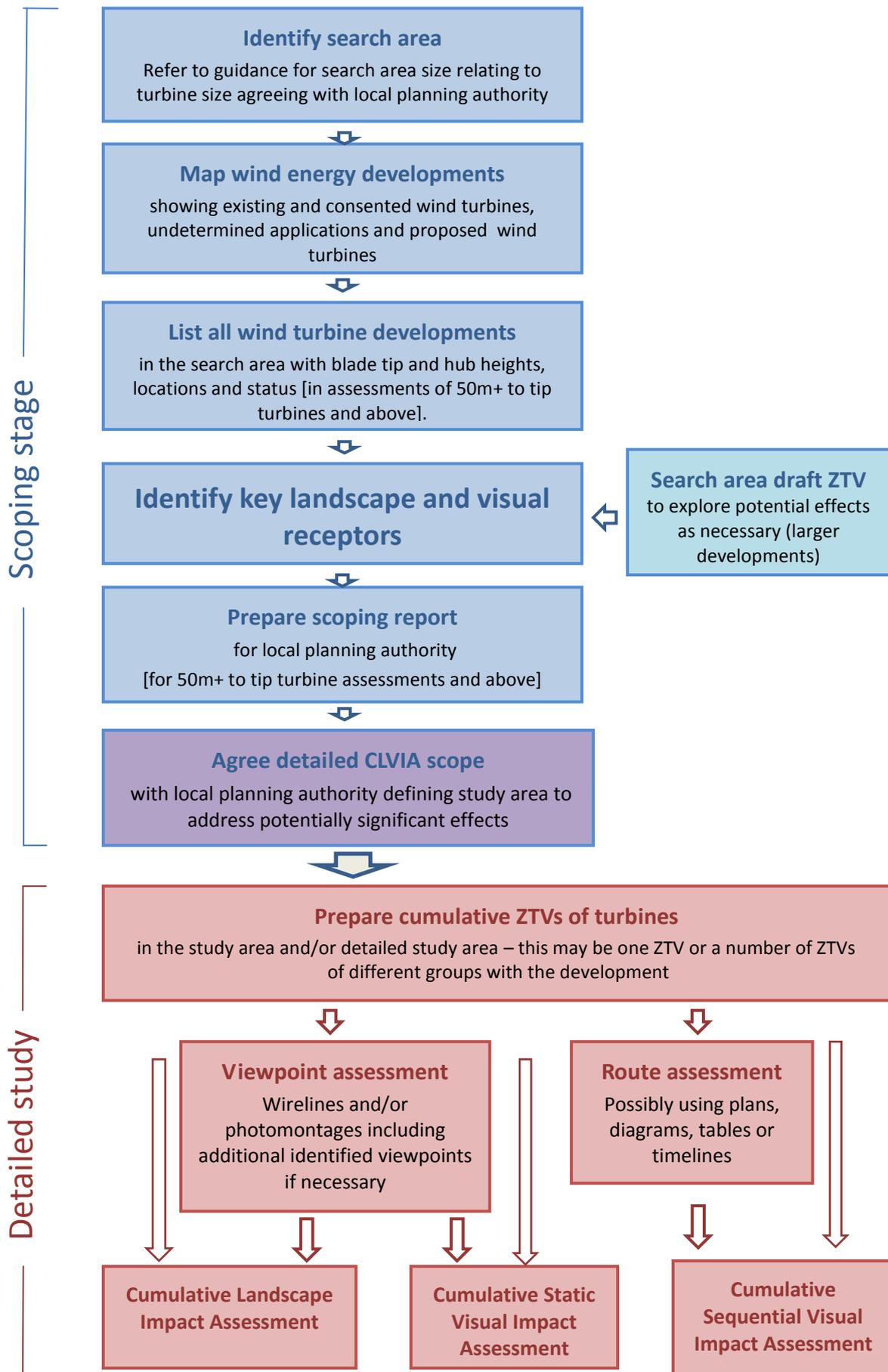
# **B**

## **STEP BY STEP GUIDE TOOLS CHECKLIST**

## 6. Step by step guide

- 6.1. A two stage process is recommended for carrying out a CLVIA for small and medium sized developments. The rationale for this is to understand what is important, to take this into account, to focus on determining potentially significant cumulative effects and demonstrate that this process has been followed. It is understood that some developments may not justify time consuming and expensive cumulative assessments techniques. The scoping stage will be a simple method of demonstrating to the Local Planning Authority what level of detail is needed before further detailed work.
- 6.2. Larger developments will require a full CLVIA using Zones of Theoretical Visibility (ZTVs), wirelines and possibly photomontages and the scoping stage would be expected as part of this process.
- 6.3. **Figure 5** sets out the process.

**Figure 5 Flow chart of process**



## 7. Tools

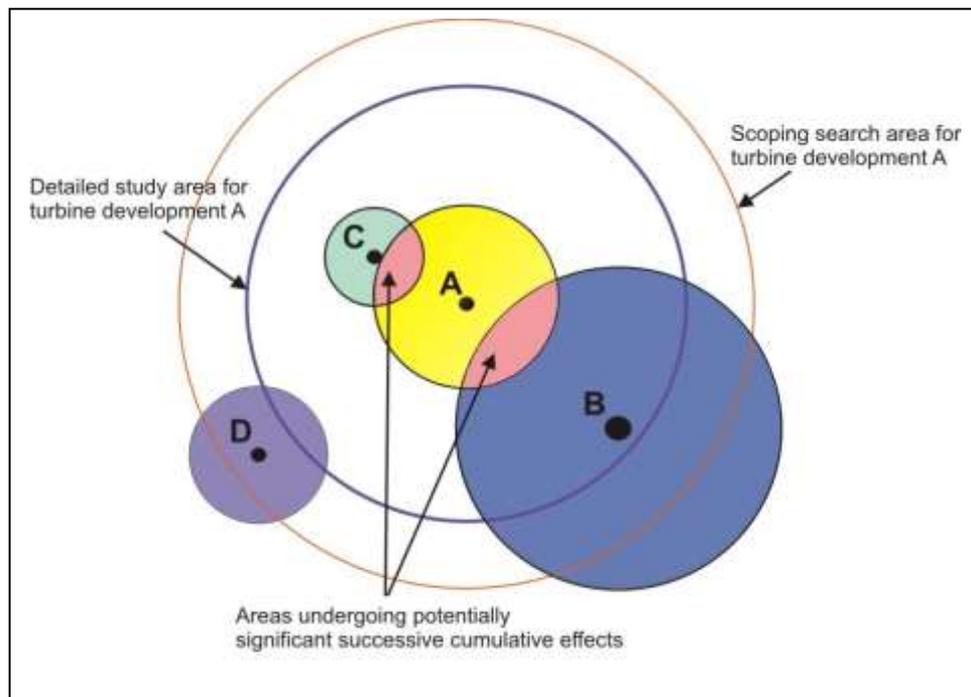
### Overview

- 7.1. The key guidance on wind turbine development LVIAs and CLVIAs is set out in **Appendix B**. This includes the GLVIA and Scottish Natural Heritage guidance on cumulative effects and Visual Representation of Windfarms, [Version 2.2 \(2017\)](#). This guidance is taken as read in the context of this SPG which is intended to refine, expand and be more specific on key cumulative impact issues.

### Two stage process- Scoping and Detailed cumulative impact assessment

- 7.2. The two stage process is recommended to ensure that all relevant turbine developments and key receptors are taken into account in a broad search area before focusing on a detailed study area where significant cumulative effects may occur. The rationale for the scoping areas is set out in **Figure 6**. The relevant scoping study areas are set out in **Table 3**.

**Figure 6 Diagrammatic Scoping and Study areas**



- 7.3. **Figure 6** illustrates a highly simplified scoping and defined study areas for turbine development A which is surrounded by turbine developments B to D. The scoping process finds that there are potentially significant effects between developments A, B and C but not between A and D.

**Table 3: Recommended areas for cumulative assessment search and study**

Proposed Turbine/s height to blade tip (m) unless otherwise stated	Scoping search area/ broad study area (km radius)	Detailed study area (km radius)
>15m to hub-35m	10km	5km
>35-50m	15km	7.5km
>50-80m	20km	10km
>80-109m	25km	10-15km
higher than 109m	30-60km	10-15km

- 7.4. As demonstrated above, there could be a significant difference between the scoping study areas and the detailed study areas, especially for smaller developments. The reason is that if there are no larger turbine developments or sensitive receptors within a given development’s scoping search area then cumulative impacts are likely to be more limited in extent. It should be noted that effects on landscape character are likely to cover a smaller geographic area than visual effects.
- 7.5. It may also be that a study area will be effectively asymmetric in order to take in particularly sensitive receptors at longer distances in particular directions. Practically, it is accepted that study areas are circular and the effects on these types of receptors will be assessed while others of limited sensitivity at a similar distance in other directions will not.
- 7.6. Turbines of the same height to blade tip with different size blades and sweep paths have potentially different effects. The above search areas cover the likely worst case effects. A rationale for the above search areas is provided in Appendix B.

**Turbine development information available**

- 7.7. Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Carmarthenshire County Council have data of relevant wind turbine developments in their areas including existing and consented wind turbines and those ‘in planning’ i.e. as planning applications. Each has data on the planning application number, status, applicant, turbine type, height to hub and blade tip and OS coordinates. These excel tables can be used to create GIS maps showing all developments, and subsequent use in ZTVs, wirelines and photomontages. It is worth checking with Local Planning Authorities if any recent applications have been received at the end of the scoping process to ensure an up-to-date assessment is carried out. If the detailed cumulative assessment process is prolonged further checks with the LOCAL PLANNING AUTHORITY may be desirable, and a ‘cut off point’ agreed.

**Cumulative Zones of Theoretical Visibility**

- 7.8. Good practice guidance notably *Visual Representation of Windfarms: Good Practice Guidance, Version 2.2, 2017*, Scottish Natural Heritage set out in detail the techniques that should be used. Primarily, it shall be the individual consultant’s responsibility to ensure that the cumulative ZTVs clearly illustrate and inform the assessment.
- 7.9. The ZTV radii will depend on the number and size of wind turbine

development around the proposal as discussed above. Ideally, the resolution of the Digital Terrain Model (DTM) will be as fine as possible to reflect any complexities of landform around the development, e.g. Profile data (10m grid) rather than Panorama data (50m grid), although a coarser grain may be acceptable beyond 5km from the proposal.

- 7.10. Ideally ZTVs should show at least visibility to blade tip height. The number and range of ZTVs will depend on the number and pattern of developments. For much of the study area the traditional style of assessing one windfarm's intervisibility with other windfarms through a series of ZTV scenarios may not be appropriate, although this should certainly be carried out for large-scale developments. In most cases the basic ZTV will indicate where the proposed development's ZTV overlaps with all the other developments. This can be refined by dividing the other developments into groups either geographically or by category such as existing/consented and those in planning. An additional ZTV could illustrate the number of turbines that are visible across the study area e.g. 1-3, 3-6, 7-9 or 1-5, 6-10, 11-15 etc. This ZTV is helpful in areas where development is small and dispersed. It would also be helpful as an overlay on landscape character areas to inform judgement of effects.
- 7.11. For linear receptors such as the Coast Path an analysis of the lengths of intervisibility between the development and receptors based on the ZTV should be undertaken. The complexity and sophistication of this will depend on the size of development.
- 7.12. It is accepted that ZTVs show the worst case scenarios of bare ground visibility. The actual visibility may be less due to the screening effect of hedgebanks, trees and buildings in the landscape.

#### **Cumulative wirelines**

- 7.13. Cumulative wirelines are useful to illustrate the relationship between the proposed development and other wind turbines. They should be located at worst case, sensitive and/or representative viewpoints agreed with the Local Planning Authority. The number required will depend on the scale of development and the likelihood of cumulative effects. For the smallest developments one or two may be acceptable, rising to four or five for intermediate developments and a significant number of all the viewpoints selected for assessment of large-scale developments. 360 degree wirelines can be helpful with viewing distances<sup>8</sup> as large as possible within practicalities.

#### **Cumulative photomontages**

- 7.14. For larger developments and/or from sensitive viewpoints, cumulative photomontages can be helpful. Generally a minimum of 300mm viewing distance is acceptable although larger viewing distances are preferable.

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<sup>8</sup> Viewing distance is the distance between the eye and an image/visualisation of a development

## **8. Cumulative Landscape and Visual Impact Assessment Checklist**

- 8.1. A matrix summarising the information and level of detail likely to be required for each scale of development is set out in the following pages. It should be read in conjunction with the rest of the guidance including the objectives.

**Table 4 Cumulative impact assessment information requirements for turbine size ranges**

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	Typical detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
Micro/ domestic	15m and less hub height	-	-	1km approximately	<ul style="list-style-type: none"> <li>In the information supporting the planning application, (e.g. Design and Access Statement), map and describe other turbines which can be seen in conjunction with the proposal and identify potential cumulative effects in a proportionate level of detail depending on potential effects.</li> </ul>
Small	above 15m hub height- 35m	10	<p>Agree with LPA:</p> <ul style="list-style-type: none"> <li>Map all wind energy development within the scoping search area radius [a 1:250,000 OS base would be sufficient]. Development will include all wind turbines that are operational, under construction, consented and ‘in planning’ i.e. undetermined planning applications. This information will be available from the LPA.</li> <li>Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area.</li> <li>Define detailed study area focusing on where significant cumulative effects may be possible.</li> <li>Define if ZTV is necessary</li> <li>Define a limited number of viewpoints for assessment and if wirelines are necessary- say 2 unless in sensitive area</li> </ul>	5	<ul style="list-style-type: none"> <li>Prepare a cumulative ZTV of all turbines in study area if necessary.</li> <li>Prepare wirelines from key viewpoints if necessary.</li> <li>Provide a brief assessment of combined and additional cumulative <b>landscape</b> effects (see Section 3.0) concentrating mainly on interaction with closest turbines e.g. do the turbines combined change the landscape character of an area and meet the objectives for the area (2.14) and what is the contribution of the proposed turbine to this?</li> <li>Provide a brief assessment of combined and additional cumulative <b>visual</b> effects (see Section 4.0) concentrating mainly on interaction with closest turbines .eg. is the proposed turbine intervisible with other turbines from key viewpoints, what is the</li> </ul>

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	Typical detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
					<p>effect and does the proposed turbine with others meet the objectives for the area (2.14)?</p> <ul style="list-style-type: none"> <li>Assess effects with other forms of development if necessary (see Section 6.0).</li> </ul>
Small/ medium	>35-50m	15	<p>Agree with LPA:</p> <ul style="list-style-type: none"> <li>Map all wind energy development within the scoping search area radius [a 1:250,000 OS base would be sufficient]. Development will include all wind turbines that are operational, under construction, consented and ‘in planning’ i.e. undetermined planning applications. This information will be available from the LPA.</li> <li>Differentiate graphically between those in planning and others and also between sizes, preferably in size categories defined in this guidance if possible.</li> <li>Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area.</li> <li>Define detailed study area focusing on where significant cumulative effects may be possible.</li> <li>Define if ZTV is necessary</li> <li>Define a limited number of viewpoints for assessment and if wirelines and/or photomontages are necessary- say 2-5 unless in sensitive area</li> </ul>	7.5	<ul style="list-style-type: none"> <li>Prepare a cumulative ZTV of all turbines in study area if necessary. This may include a ZTV showing the overlap of visibility with other turbines and/or the number of turbines visible.</li> <li>Prepare wirelines from key viewpoints if necessary.</li> <li>Provide an assessment of combined and additional cumulative <b>landscape</b> effects (see Section 3.0) concentrating mainly on interaction with closest turbines e.g. do the turbines combined change the landscape character of an area and meet the objectives for the area (2.14) and what is the contribution of the proposed turbine to this?</li> <li>Provide an assessment of combined and additional cumulative <b>visual</b> effects (see Section 4.0) concentrating mainly on interaction with closest turbines e.g. is the proposed turbine intervisible with other turbines from key viewpoints, what is the effect and does the proposed turbine with others meet the objectives for the area</li> </ul>

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	Typical detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
					(2.14)? <ul style="list-style-type: none"> <li>Assess effects with other forms of development if necessary (see Section 6.0).</li> </ul>
Medium	>50-80m	20	<p>Agree with LPA:</p> <ul style="list-style-type: none"> <li>Map all wind energy development within the scoping search area radius [a 1:50,000 OS base would be sufficient]. Development will include all wind turbines that are operational, under construction, consented and ‘in planning’ i.e. undetermined planning applications. This information will be available from the LPA but should be updated if necessary.</li> <li>Differentiate graphically between those in planning and others and also between sizes, preferably in size categories defined in this guidance if possible.</li> <li>List turbine developments taken into consideration.</li> <li>Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area.</li> <li>Define detailed study area for ZTV focusing on where significant cumulative effects may be possible.</li> <li>Define a limited number of viewpoints for assessment and if wirelines and/or photomontages are necessary- say 3-5 unless in sensitive area</li> </ul>	10	<ul style="list-style-type: none"> <li>Prepare a cumulative ZTV of all turbines in study area if necessary. This may include a ZTV showing the overlap of visibility with other turbines and/or the number of turbines visible. Scenarios differentiating between existing/consented and ‘in planning’ may be helpful.</li> <li>Prepare wirelines from key viewpoints if necessary.</li> <li>Provide an assessment of combined and additional cumulative <b>landscape</b> effects (see Section 3.0) using standard CLVIA methods (e.g. tables of effects) also addressing if the developments meet the objectives for the area (2.14) and what the contribution of the proposed turbine is to this.</li> <li>Provide an assessment of combined and additional cumulative <b>visual</b> effects (see Section 4.0) using standard CLVIA methods (e.g. tables of effects) also addressing if the developments meet the objectives for the area (2.14) and what the contribution of the proposed turbine is to this.</li> <li>Assess effects with other forms of development if necessary (see Section 6.0).</li> </ul>

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	Typical detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
Medium /large	>80-109m	25	<p>Agree with LPA:</p> <ul style="list-style-type: none"> <li>Map all wind energy development within the scoping search area radius [a 1:50,000 OS base would be sufficient]. Development will include all wind turbines that are operational, under construction, consented and ‘in planning’ i.e. undetermined planning applications. This information will be available from the LPA but should be updated if necessary.</li> <li>Differentiate graphically between those in planning and others and also between sizes, preferably in size categories defined in this guidance.</li> <li>List turbine developments taken into consideration.</li> <li>Carry out scoping ZTV to establish potential for significant effects.</li> <li>Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area.</li> <li>Define detailed study area focusing on where significant cumulative effects may be possible.</li> <li>Define a number of viewpoints for assessment and where wirelines and/or photomontages are necessary. These may range from 5 to many of the viewpoints selected for the individual impact assessment for larger projects.</li> </ul>	10-15	<ul style="list-style-type: none"> <li>Prepare a cumulative ZTV of all turbines in study area. This may include a ZTV showing the overlap of visibility with other turbines and/or the number of turbines visible. Scenarios differentiating between existing/consented and ‘in planning’ would be helpful.</li> <li>Prepare wirelines and/or photomontages from key viewpoints if necessary.</li> <li>Prepare wirelines from key viewpoints.</li> <li>Provide an assessment of combined and additional cumulative <b>landscape</b> effects (see Section 3.0) using standard CLVIA methods (e.g. tables of effects) also addressing if the developments meet the objectives for the area (2.14) and what the contribution of the proposed turbine is to this.</li> <li>Provide an assessment of combined and additional cumulative <b>visual</b> effects (see Section 4.0) using standard CLVIA methods (e.g. tables of effects) also addressing if the developments meet the objectives for the area (2.14) and what the contribution of the proposed turbine is to this.</li> <li>Assess effects with other forms of development if necessary (see Section 6.0).</li> </ul>

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	Typical detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
					This is a transitional category where the approach taken for larger turbines or developments is likely to follow that for the large turbine category below.
Large	higher than 109m	30-60	<p>Agree with LPA:</p> <ul style="list-style-type: none"> <li>• Map all wind energy development within the scoping search area radius [a 1:50,000 OS base would be sufficient]. Development will include all wind turbines that are operational, under construction, consented and ‘in planning’ i.e. undetermined planning applications. This information will be available from the LPA but should be updated if necessary.</li> <li>• Differentiate graphically between those in planning and others and also between sizes, preferably in size categories defined in this guidance.</li> <li>• List turbine developments taken into consideration.</li> <li>• Carry out scoping ZTV to establish potential for significant effects.</li> <li>• Define key landscape and visual receptors that may undergo significant cumulative effects in the scoping area.</li> <li>• Define detailed study area focusing on where significant cumulative effects may be possible.</li> <li>• Define a number of viewpoints for assessment and where wirelines and/or photomontages are necessary. These may range from around 10 to many of the viewpoints selected for the individual impact assessment.</li> </ul>	10-15	<p>Full CLVIA requirements including:</p> <ul style="list-style-type: none"> <li>• Prepare cumulative ZTVs of scenarios/groups of all windfarms i.e. 3 or more clusters of turbines and those over 50m tall to blade tip for <i>broad</i> study area.</li> <li>• Prepare a ZTV showing the overlap of visibility with all other turbines and/or the number of turbines visible in <i>detailed</i> study area. Scenarios differentiating between existing/consented and ‘in planning’ would be helpful.</li> <li>• Prepare wirelines and photomontages from all viewpoints where cumulative effects are possible.</li> <li>• Provide detailed assessment using standard CLVIA methods (e.g. tables of effects) and commentary on combined and additional cumulative landscape and visual effects with larger developments.</li> <li>• Provide a commentary on the interaction of the development with smaller scale wind turbine development [in less than clusters of 3 and less than 50m to blade tip] in the detailed study area.</li> <li>• Provide a commentary on whether the</li> </ul>

Turbine size	Height range to blade tip [m]** unless otherwise stated	Scoping/ search area/ broad study area radius [km]	Cumulative effects scoping/search area	<i>Typical</i> detailed study area radius [km]*	Cumulative Landscape and Visual Effects in study area/ detailed study area
					<p>proposals with other developments meet the objectives for the area (2.14)</p> <ul style="list-style-type: none"> <li>Assess effects with other forms of development if necessary (see Section 6.0).</li> </ul>

\*Note that typical study areas distances stated may be insufficient to include all relevant sensitive receptors who may undergo significant effects so this is for general guidance only.

\*\*Unless otherwise stated

# **APPENDICES**

# **APPENDIX A**

## **Planning Context and Background**

## 9. Planning context and background

- 9.1. This guidance provides information to support planning policy. The current planning policies and guidance of particular relevance to wind energy are set out below.

### National legislation and guidance

- 9.2. Planning applications for onshore generating projects in Wales which have an installed generation capacity of over 10MW are made directly to the Welsh Ministers under the Developments of National Significance (DNS) process. Under the Planning Act 2008, the National Policy Statements EN-1 and EN-3 for Renewable Energy Infrastructure July 2011 applies to nationally significant offshore wind turbine developments in Wales i.e. above 350MW output. This forms the primary basis for decisions by the the Planning Inspectorate. Planning authorities are only statutory consultees in relation to these developments.
- 9.3. The only location for such developments in the current planning framework in Wales are the Strategic Search Areas (SSAs) defined by TAN8
- 9.4. **Planning Policy Wales Edition 10** December 2018 (PPW) sets out the land use planning policies of the Welsh Government.
- 9.5. *-grid connection issues where renewable (electricity) energy developments are proposed.....'* (12.10)**Technical Advice Note (TAN) 8: Planning Policy for Renewable Energy**, provides technical advice to supplement the policy set out in PPW. It sets out a spatial strategy and objectives for onshore wind turbine development concentrating large windfarms into strategic search areas. In relation to the effects on landscape it states:

*'the implicit objective ... is to maintain the integrity and quality of the landscape within National Parks/Areas Of Outstanding Natural Beauty in Wales i.e. no change in landscape character from wind turbine development. In the rest of Wales outside the Strategic Search Areas the implicit objective is to maintain the landscape character ie no significant change in landscape character from wind turbine development. Within (and immediately adjacent to) the Strategic Search Areas, the implicit objective is to accept landscape change i.e. significant change in the landscape character from wind turbine development.'* (Annex D 8.4).

### Pembrokeshire Coast National Park Policies

- 9.6. Pembrokeshire Coast National Park is the only UK national park predominantly designated for its coast. The splendour of its coastline and islands off the coast, the influence of the seascape, its spectacular scenery, and rugged, unspoilt beauty combine to produce strong scenic quality. A sense of tranquillity and remoteness is also highly valued amongst visitors to the area.
- 9.7. The **Pembrokeshire Coast National Park Local Development Plan 2** was adopted in September 2020. It includes a number of policies relevant to wind turbines.
- 9.8. The special qualities of the Park are listed such as coastal splendour,

islands, remoteness, tranquillity and wildness and diversity of landscape. Policy 8 Special Qualities (Strategy Policy) states that the special qualities of the Pembrokeshire Coast National Park will be protected and enhanced. The priorities will be to ensure that:

*'a) The sense of remoteness and tranquillity is not lost and is wherever possible enhanced...*

*c) The pattern and diversity of the landscape is protected and where possible enhanced...*

*d) The historic environment is protected and where possible enhanced...*

*i) Development of the undeveloped coast is avoided and sites within stretches*

*of the developed coast are protected for uses that need a coastal location.'*

9.9. Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park, states that: Development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

*'a) causing significant visual intrusion; and/or,*

*b) introducing or intensifying a use which is incompatible with its location; and/or*

*c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or*

*d) losing or failing to incorporate important traditional features.'*

9.10. Pembrokeshire Coast National Park Local Development Plan Policy 33: Renewable and Low Carbon Energy, states that:

*'for renewable and low carbon energy development including those relating to wind, solar and hydro power, anaerobic digestion and biomass will be permitted subject to the following criteria:*

*a) Small and medium scale renewable energy schemes would not individually or cumulatively have an unacceptable impact on the visual amenities, landscape character and/or nature conservation value of the local area.*

*b) Large scale renewable energy and low carbon energy schemes would not individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park'.*

9.11. It goes on to clarify what is meant by these scales of energy and the potential for them in the Park in Table 6

9.12. A **Landscape Character Assessment SPG** for Pembrokeshire Coast National Park was completed in 2006 and updated in 2011 and 2020. The Assessment identified 28 distinct Landscape Character Areas lying within, or partly within, the National Park. A data sheet for each Landscape Character Area identifies the particular attributes of these areas and the threats they face, and sets out management guidance for them.

- 9.13. “A local seascape character assessment was carried out for Pembrokeshire, among other areas, in 2013. This assessment is set within the framework of the regional Welsh Seascapes study completed by the former Countryside Council for Wales in 2009 (updated in 2015), referred to in paragraph 4.3. The National Park Authority’s **Seascape Character Assessment SPG** is based on the Pembrokeshire Seascape Character Assessment. The report explains the method, gives an overview of the seascape, sets out the cultural benefits and services, the forces for change and the key sensitivities.”
- 9.14. The Pembrokeshire Coast National Park Authority **Renewable Energy SPG 2011** supports the positive implementation of Policy 33. This guidance has been rolled over to be effective for development management purposes for LDP 2 from the date of Plan adoption. Turbines are classified in four sizes to blade tip ‘to reflect the landscape sensitivities’ of Pembrokeshire Coast National Park- Large- greater than 65m; Medium- 25-65m; Small- less than 25m; and Micro- Building or mast orientated. The landscape sensitivity to the above scales of development of each of the 28 landscape character areas are set out based on a study carried out in 2008 and updated in 2020. These should be taken into consideration in any CLVIA where the landscape impact assessment study area includes the National Park.
- 9.15. Key landscape sensitivities for the Pembrokeshire Coast National Park are set out including:
- Locate any development back from the coastal edge
  - Locate any development away from the most prominent rural skylines
  - Consider views along the coast including along the Coast Path
  - Avoid siting turbines in the most tranquil areas
  - Only site turbines where they can relate well to existing buildings or built structures in the landscape
  - Wind turbine development within the protected landscape should not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the Park.

## **APPENDIX B**

### **Rationale for recommended areas for cumulative assessment search and study**

## 11: Rationale for recommended areas for cumulative assessment search and study

11.1 The report recommends the following scoping and detailed study areas in Table 3:

Proposed Turbine/s height to blade tip (m) unless otherwise stated	Scoping search area/ broad study area (km radius)	Detailed study area (km radius)
>15m to hub-35m	10km	5km
>35-50m	15km	7.5km
>50-80m	20km	10km
>80-109m	25km	10-15km
higher than 109m	30-60km	10-15km

11.2 The rationale for the distances is that the document is focussed on understanding the likely significant cumulative effects for onshore wind turbine development assessments rather than all effects. Many CLVIAs provide *only* large study areas/ZTVs which cover many viewpoints at larger distances which can obscure consideration of the more significant effects which tend to occur closer to any given development. Broad scoping areas are helpful in determining which developments should be included, and where there are sensitive landscapes, receptors or large development within them these should be assessed to the appropriate level of detail. However, the detailed study areas are most likely to encompass receptors undergoing significant effects.

11.3 The SNH guidance Visual Representation of Windfarms: Good Practice Guidance, [Version 2.2 \(2017\)](#) puts forward recommended ZTV distances as follows [p12]:

Height of turbines including rotors (m)	Recommended initial ZTV distance from nearest turbine or outer circle of wind farm (km)
Up to 50	15
51-70	20
71-85	25
86-100	30
101-130	35
<a href="#">131-150</a>	<a href="#">40</a>
<a href="#">150 +</a>	<a href="#">45</a>

11.4 The above figures are reflected in the recommended scoping search area radii put forward in SNH guidance 'Assessing the Cumulative Impact of Onshore Wind Energy Developments' ie 35km- 60km [60, 63, p14]. The

latter figure of 60km is an approximate doubling to allow for the effects of other large scale developments with similar effects.

11.5 This scale of scoping ZTV and study area is particularly pertinent in large scale, wild, tranquil or remote landscapes and seascapes, possibly with uninterrupted views. However, in more complex landscapes including lowland landscapes and for smaller scale onshore developments, a more focussed area is more relevant to addressing potentially significant effects.

11.6 No other guidance on distances for scoping or detailed study areas was found in the desk study. Therefore, the distances have been arrived at through experience of Carmarthenshire Council and White Consultants in reviewing the LVIAs and assessing the effects of many wind farm developments for development control purposes. The rules of thumb developed by White Consultants are as follows:

Height of turbines	Typical upper distance for where a wind energy development may be an apparent* feature (km)	Doubling for minimum cumulative scoping/broad study area (km)	Typical upper distance where a wind energy development may be a noticeable* or conspicuous* feature (km)	Doubling (generally) for cumulative detailed study area (km)
>15m to hub-35m	5	10	2.5	5
>35-50m	7.5	15	4	7.5
>50-80m	10	20	6	10
>80-109m	12.5	25	8	10-15
higher than 109m	15	30	10	10-15

**Notes:**

\*derived from terminology used in ‘Visual Assessment of Windfarms: Best Practice’, Scottish Natural Heritage, 2002, Table 18, p64.

1 If two wind energy developments are apparent to a receptor on two sides this may lead to significant effects, especially on sensitive receptors. If they are noticeable or conspicuous on two sides then the effect is more likely to be significant.

2 Individual developments should be considered on their own merits as different distances may be appropriate for some situations (eg depending on character and sensitivity) and developments (eg depending on extent). The detailed study area distances may also need to be adjusted if existing or consented developments of different sizes are located in the broad study area.

3 The detailed study areas do not necessarily equate with the extent of potential significant effects and may need to be adjusted. For larger developments it should be used in conjunction with the broader study area.

## **APPENDIX C**

### **Useful References**

## **Appendix C: Useful References**

### **Landscape and visual impact assessment and cumulative landscape and visual impact assessment**

Guidelines for Landscape and Visual Impact Assessment (GLVIA), Third Edition, Landscape Institute and IEMA, April 2013.

'Visual Assessment of Windfarms: Best Practice', Scottish Natural Heritage, 2002.

Landscape Character Assessment, Guidance for England and Scotland, Swanwick, Carys and LUC, Scottish Natural Heritage with the Countryside Agency, 2002.

Visual Representation of Windfarms: Good Practice Guidance, [Version 2.2, 2017](#), Scottish Natural Heritage.

'Review of Guidance on the Assessment of Cumulative Impacts of Onshore Windfarms', Entec, DBERR, 2008

Siting and designing windfarms in the landscape, Version 1, 2009, Scottish Natural Heritage

Landscape Capacity Studies in Scotland - a review and guide to good practice', Scottish Natural Heritage 2009

LANDMAP information Guidance Note 3: Using LANDMAP for landscape and visual impact assessment of onshore wind turbines, Natural Resources Wales

Photography and photomontage in landscape and visual impact assessment, Advice Note 01/11, Landscape Institute, 2011.

'Assessing the impact of small-scale wind energy proposals on the natural heritage ', Scottish Natural Heritage February 2011

Assessing the cumulative impact of onshore wind energy developments, March 2012, Scottish Natural Heritage

Siting and design for small scale wind turbines between 15 and 50 metres in height, 2012, Scottish Natural Heritage

### **Seascape**

Guide to best practice in seascape assessment, Countryside Council for Wales, Brady Shipman and Martin, University College Dublin, 2001.

Guidance on the assessment of the impact of offshore wind farms: seascape and visual impact, DTI, 2005

Welsh seascapes and their sensitivity to offshore developments, Briggs, J.H.W. & White, S, Countryside Council for Wales Policy Research Report No. 08/5, January 2009.

An approach to Seascape Character Assessment, (NECR105), Natural England, Scottish Natural Heritage and Countryside Council for Wales, 2012.

[National Seascape Assessment for Wales, Natural Resources Wales Evidence Report No 80, November 2015](#)

### **Other guidance referred to in preparation of report**

Cumbria Wind Energy Supplementary Planning Document, Cumbria County Council, 2007

Wind Turbine Development Policy Guidance, Fenland District Council, 2009

Wind Energy Supplementary Planning Guidance, Fife Council, 2011

Onshore Wind Energy Strategy for Fife, Cumulative Impact Assessment', Fife Council, December 2012

Argyll and Bute Landscape Wind Energy Capacity Study, Argyll and Bute Council, March 2012

# **APPENDIX D**

## **Glossary**

## Appendix D: Glossary of landscape, seascape and visual terms

<b>Term</b>	<b>Definition</b>
<b>Amenity Planting</b>	planting to provide environmental benefit such as decorative or screen planting.
<b>Analysis</b>	the process of dividing up the seascape/landscape into its component parts to gain a better understanding of it.
<b>Ancient Woodland</b>	land continuously wooded since AD 1600. It is an extremely valuable ecological resource, usually with a high diversity of flora and fauna.
<b>Apparent</b>	object visible in the seascape/landscape.
<b>Approach</b>	the step-by-step process by which seascape/landscape assessment is undertaken.
<b>Arable</b>	land used for growing crops other than grass or woody species.
<b>Aspect</b>	in Wales, an aspect is a component of the LANDMAP information recorded, organised and evaluated into a nationally consistent spatial data set. The landscape information is divided into five aspects- geological landscape, landscape habitats, visual and sensory, historic landscape and cultural landscape.
<b>Aspect area</b>	areas defined in each of the LANDMAP aspect assessments which are mutually exclusive
<b>Assessment</b>	term to describe all the various ways of looking at, analysing, evaluating and describing the seascape/landscape or assessing impacts on seascape/landscape and visual receptors.
<b>Biodiversity</b>	the variety of life including all the different habitats and species in the world.
<b>Character</b>	see landscape/seascape character.
<b>Characteristics</b>	elements, features and qualities which make a particular contribution to distinctive character. *
<b>Characterisation</b>	the process of identifying areas of similar character, classifying and mapping them and describing their character. *
<b>Classification</b>	concerned with dividing the seascape into areas of distinct, recognisable and consistent common character in grouping areas of similar character together. It requires the identification of patterns in the seascape, created by the way the natural and human influences interact and are perceived and experienced to create character in the seascape.*
<b>CLVIA Scoping assessment</b>	the scoping process as set out in this document. This should preferably be carried out at the initial scoping stage of the EIA process but can follow at a later date in some situations, but before submission of the LVIA/CLVIA.
<b>Compensation</b>	the measures taken to offset or compensate for adverse effects that cannot be mitigated, or for which mitigation cannot entirely eliminate adverse effects.
<b>Combined visibility and effects</b>	the observer is able to see two or more developments from one viewpoint. This divided into ' <i>in combination</i> '- several wind turbine developments are within the observer's arc of vision at

	the same time OR ' <i>in succession</i> ', where the observer has to turn to see various wind turbine developments.
<b>Complexity</b>	(in the context of describing a skyline) how varied or complicated the skyline is from dead flat with even vegetation at one end of the scale to mountainous with varied vegetation at the other.
<b>Term</b>	<b>Definition</b>
<b>Conservation</b>	the protection and careful management of natural and built resources and the environment.
<b>Consistent</b>	relatively unchanging element or pattern across a given area of seascape/landscape.
<b>Cumulative Impacts</b>	the changes caused by a proposed development in <i>addition</i> to other similar developments or as the <i>combined</i> effect of a set of developments, taken together. This may be an on-going process as new applications are made. The assessment of these impacts (a CLVIA) is normally carried out as part of an environmental impact assessment.
<b>Cumulative landscape effects</b>	cumulative effects as defined above on landscape can impact on either the physical fabric, or character of the landscape.
<b>Cumulative visual effects</b>	cumulative effects as defined above on people who have differing sensitivity depending on what they are doing and where they are located.
<b>Description</b>	capturing the overall essence of the character of the landscape with reference to geology, landform, landscape pattern, vegetation, settlement, historical and cultural associations etc, drawing out the ways in which these factors interact together and are perceived and experienced and are associated with events and people.
<b>Distinctiveness</b>	see sense of place
<b>Diversity</b>	(in terms of the function of an area) the variety of different functions of an area.
<b>Dominant</b>	main defining feature or pattern.
<b>Effects, direct</b>	where development lies within a seascape/landscape and physically removes or affects an element or feature e.g. rocks, cliff, coastal vegetation, watercourses, drainage
<b>Effects, indirect</b>	non-physical effects such as perceived change of character or from associated development such as transport infrastructure
<b>Elements</b>	individual component parts of the landscape such as hedges, walls, trees, fields.
<b>Environmental Impact Assessment</b>	the process used for describing, analysing and evaluating the range of environmental effects that are caused by a wind energy proposal.
<b>Environmental Statement</b>	the document supporting a planning application that sets out the findings of the environmental impact assessment
<b>Features</b>	particularly prominent or eye-catching elements such as churches, castles, rock outcrops.
<b>Field Boundary</b>	the defined edge of a field eg fence, hedge, bank, ditch or wall.

<b>Field Size</b>	Large 2 Ha Above, Medium Around 1.5 Ha, Small Less Than 1 Ha.
<b>Geology</b>	the study of the origin, structure, composition and history of the Earth together with the processes that have led to its present state.
<b>Term</b>	<b>Definition</b>
<b>Impact</b>	used as part of overall term, as in EIA or LVIA, to help describe the process of assessing potentially significant effects. See effects.
<b>Improved (in relation to soils or pasture)</b>	addition of fertiliser and, in the case of pasture, reseeded with more productive grass species.
<b>Inherent</b>	dictionary definition- 'existing as an inseparable part'. In the context of sensitivity means the sensitivity of the seascape/landscape zone itself with all its component elements and features rather than its relationship with adjacent zones.
<b>Integrity</b>	unspoilt by large-scale, visually intrusive or other inharmonious development
<b>Key characteristics</b>	those combination of elements which help give an area its distinct sense of place.
<b>Landcover</b>	combinations of natural and man-made elements including vegetation that cover the land surface.
<b>Landform</b>	combinations of slope and elevation which combine to give shape and form to the land.
<b>LANDMAP</b>	<i>LANDMAP</i> is the national Geographical Information System (GIS) based information system for Wales, devised by the Countryside Council for Wales, for taking landscape into account in decision-making. It is a nationally consistent dataset divided into 5 aspects- geological landscapes, landscape habitats, visual and sensory, historical landscapes and cultural landscapes.
<b>Perception</b>	perception combines the sensory (that which we receive through our senses) with the cognitive (knowledge and understanding gained from many sources and experiences).
<b>Landscape</b>	an area of land, as perceived by people, whose character results from the actions and interactions of land with natural and/or human factors.
<b>Landscape Capacity</b>	the degree to which a particular landscape character type or area is able to accommodate change of a particular <i>type</i> , <i>scale</i> and <i>amount</i> without unacceptable adverse effects on its character.
<b>Landscape Capacity Assessment/study</b>	the process of describing, analysing and evaluating the landscape capacity of an area. This is normally carried out as a strategic baseline study for a local authority area.
<b>Landscape character</b>	landscape character is a distinct and recognisable pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
<b>Landscape character</b>	LCA is the process of identifying and describing variation in the character of the landscape, and using this information to assist

<b>assessment (LCA)</b>	in managing change in the landscape. It seeks to identify and explain the unique combination of elements and features that make seascape distinctive. *
<b>Term</b>	<b>Definition</b>
<b>Landscape character areas</b>	these are single unique areas which are discrete geographical areas of a particular landscape character. Each has its own individual character and identity.
<b>Landscape character types</b>	these are distinct types of landscape that are relatively homogenous in character. They are generic in nature in that they may occur in different locations but wherever they occur they share broadly similar combinations of geology, topography and landcover characteristics.
<b>Landscape guidelines</b>	actions required to ensure that distinctive landscape character is maintained, enhanced or if appropriate, changed through the creation of new character.
<b>Landscape quality</b>	the physical state of the landscape. It includes the extent to which typical character is represented in individual areas, sometimes referred to as strength of character, the intactness of the landscape from visual, functional and ecological perspectives and the condition or state of repair of individual elements of the landscape.
<b>Landscape Resource</b>	the overall stock of the landscape and its component parts. (the landscape considered as a measurable finite resource like any other e.g. minerals, land, water).
<b>Landscape sensitivity</b>	the ability of the landscape to respond to and accommodate change. It reflects character, the nature of change and the way both are perceived and experienced by people.
<b>Landscape Sensitivity Assessment/study</b>	the process of describing, analysing and evaluating the landscape sensitivity of an area. This is normally carried out as a strategic baseline study for a local authority area.
<b>Landscape value</b>	the relative value that is attached to different landscapes and LANDMAP aspects. A landscape may be valued by different communities of interest for many different reasons. These can include scenic beauty, tranquillity, wildness, special cultural associations, the presence of conservation interests, rarity or the existence of a consensus about importance, either nationally or locally. Some areas will be designated to express their value. Value is also attributed to each LANDMAP aspect using a variety of criteria. An indication of how an area is valued may also be gained from observation of how it is used- e.g. a popular path to a hilltop viewpoint.
<b>Landscape and Visual Impact Assessment (LVIA)</b>	is an established methodology which is used to assess the impact of the development or other use change on seascape, landscape and visual amenity. It includes analysis of the effects during the construction, operation and decommissioning phases of the development, including any restoration or after uses.
<b>Magnitude of effect</b>	degree of change
<b>Micro-generation</b>	very small scale power generation schemes, typically providing

	energy to a single dwelling
<b>Mitigation</b>	measures including any process, activity or design to avoid, reduce or remedy adverse effects of a development proposal. It does not include compensation.
<b>Term</b>	<b>Definition</b>
<b>Mixed Farmland</b>	a combination of arable and pastoral farmland
<b>Mosaic</b>	mix of different landcovers at a fine grain such as woodland, pasture and heath.
<b>Objective</b>	method of assessment in which personal feelings and opinions do not influence characterisation or judgements.
<b>Perceived effects</b>	the perceptions of the impact on the landscape by people who <i>know</i> of other developments even when they cannot <i>see</i> them.
<b>Physiography</b>	expression of the shape and structure of the land surface as influenced both by the nature of the underlying geology and the effect of geomorphological processes.
<b>Polygon</b>	discrete digitised area in a geographic information system(GIS).
<b>Prominent</b>	noticeable feature or pattern in the landscape.
<b>Protect</b>	to keep from harm.
<b>Qualities</b>	aesthetic (objective visible patterns)or perceptual ( subjective responses by the seascape/landscape assessor) attributes of the seascape/landscape such as those relating to scale or tranquillity respectively.
<b>Receptor, visual</b>	people in different situations who can experience views within an area and who may be affected by change or development.
<b>Receptor, seascape/landscape</b>	seascape/landscape character areas, designations, elements or features which may be affected by development.
<b>Remoteness</b>	physical isolation, removal from the presence of people, infrastructure (roads and railways, ferry and shipping routes) and settlement and noise.
<b>Renewable Energy</b>	collective term for energy flows that occur naturally and repeatedly in the environment without significant depletion of resources. It includes energy derived by the sun, such as wind, solar hot water, solar electric (photo-voltaics), hydro power, wave, tidal, biomass, biofuels, and from geothermal sources, such as ground source heat pumps.
<b>Resource</b>	see landscape resource.
<b>Scenic quality</b>	seascape/landscape with scenes of a picturesque quality with aesthetically pleasing elements in composition ( <i>derived from LANDMAP visual and sensory aspect</i> ).
<b>Scoping assessment</b>	the process of identifying the issues to be addressed by an EIA. It is a method of ensuring that an EIA focusses on the important issues and avoids those that are considered to be less significant. (source: GLVIA3). See also CLVIA scoping assessment.
<b>Semi-natural vegetation</b>	theoretically any type of vegetation that has been influenced by human activities, either directly or indirectly. The term is

	usually applied to uncultivated areas managed at a low intensity such as heathland, herb and fern, rough grassland, wetland/mire, scrub and woodland.
<b>Term</b>	<b>Definition</b>
<b>Sensitive receptor</b>	<p>in terms of a visual receptor, a person who can experience views of a development and who may be particularly affected by the change because of the activity in which they are engaged. Sensitive receptors can include people in and around their own homes and those setting out to enjoy the landscape or seascape such as users of public rights of way, open access land, and tourists.</p> <p>In terms of landscape, sensitive receptors may include designated and highly valued areas and certain landscape patterns and features such as prominent or complex skylines and settings of historic features.</p>
<b>Sensory</b>	that which is received through the senses i.e. sight, hearing, smell, touch.
<b>Sense Of Place</b>	the character of a place that makes it locally identifiable or distinctive i.e. different from other places. Some features or elements can evoke a strong sense of place eg islands, forts, vernacular architecture
<b>Sequential cumulative visual effects</b>	where the observer has to move to a series of viewpoints to see different developments. This can be <i>frequently sequential</i> where features appear with short time lapses in between to <i>occasionally sequential</i> where there are long time lapses between locations where wind turbines are visible.
<b>Setting, of a heritage asset</b>	the surroundings in which the asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or a negative contribution to an asset, may affect the ability to appreciate that significance or may be neutral.
<b>Significance/ significant effect</b>	in environmental impact assessment- the importance of an effect. A significant effect needs to be taken into account in decision-making.
<b>Subjective</b>	method of assessment in which personal views and reaction are used in the characterisation process.
<b>Topography</b>	term used to describe the geological features of the Earth's surface e.g. mountains, hills, valleys, plains.
<b>Unity</b>	consistency of pattern over a wide area i.e. the repetition of similar elements, balance and proportion, scale and enclosure.
<b>Value</b>	see landscape value
<b>Viewing distance</b>	the distance between the eye and an image/visualisation of a development.
<b>Visibility in succession</b>	where the observer at a static viewpoint has to turn to see various wind turbine developments.
<b>Visual Effects</b>	the likely visual effects undergone by people that would result

	from a development proposal or change in land management.
<b>Wind Energy Development</b>	development consisting of one or more wind turbines, access tracks, ancillary buildings, substation, anemometer masts and supporting infrastructure.
<b>ZTV</b>	ZTV or ZVI (Zone of Visual Influence) analysis is the process of determining the visibility of an object in the surrounding landscape. The process is objective in which areas of visibility or non-visibility are determined by computer software using a digital elevation dataset. The output from the analysis is used to create a map of visibility.

\*Natural England, Scottish Natural Heritage and the Countryside Council for Wales (2011), Landscape Character Assessment Guidance (consultation draft).